FILED
TARRANT COUNTY
9/3/2019 12:00 AM
THOMAS A. WILDER
DISTRICT CLERK

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	§	IN THE DISTRICT COURT
v.	§	141st JUDICIAL DISTRICT
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, AND RONALD TOYE, Defendants	§	TARRANT COUNTY, TEXAS

PLAINTIFF'S SECOND AMENDED PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Victor Mignogna ("Plaintiff" or "Vic") complains of Defendants Funimation Productions, LLC, Jamie Marchi, Monica Rial, and Ronald Toye, and for such purposes would show:

I. DISCOVERY CONTROL PLAN

(1) Discovery is intended to be conducted pursuant to Texas Rule of Civil Procedure 190.3 (Level 2 discovery control plan).

II. PARTIES

(2) Vic is an individual residing in Tarrant County, Texas who may be served in this matter through his attorney of record, Ty Beard, Esq., BEARD HARRIS BULLOCK HUGHES, 100 Independence Place, Suite 300, Tyler, Texas 75703.

(3) Defendant Funimation Productions, LLC ("Funimation") is a Delaware limited liability company which may be served in this matter through its attorney of record, John Volney, Esq., LYNN PINKER COX & HURST, LLP, 2100 Ross Avenue, Suite 2700, Dallas, Texas 75201.

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(4) Defendant Jamie Marchi ("Jamie") is an individual residing in Dallas County, Texas who may be served in this matter through her attorney of record, Samuel H. Johnson, Esq., JOHNSON & SPARKS PLLC, 7161 Bishop Road, Suite 220, Plano, Texas 75204.

(5) Defendant Monica Rial ("Monica") is an individual residing in Dallas County, Texas who may be served in this matter through her attorneys of record Casey S. Erick, Esq., COWLES & THOMPSON PC, 901 Main Street, Suite 3900, Dallas, Texas 75202, Andrea Perez, Esq., KESSLER COLLINS, PC, 2100 Ross Avenue, Suite 750, Dallas, Texas 75201, and J. Sean Lemoine, Esq., WICK PHILLIPS GOULD & MARTIN, LLP, 3131 McKinney Avenue, Suite 100, Dallas, Texas 75204.

(6) Defendant Ronald Toye ("Ronald") is an individual residing in Dallas County, Texas who may be served in this matter through his attorneys of record Casey S. Erick, Esq., COWLES & THOMPSON PC, 901 Main Street, Suite 3900, Dallas, Texas 75202, Andrea Perez, Esq., KESSLER COLLINS, PC, 2100 Ross Avenue, Suite 750, Dallas, Texas 75201, and J. Sean Lemoine, Esq., WICK PHILLIPS GOULD & MARTIN, LLP, 3131 McKinney Avenue, Suite 100, Dallas, Texas 75204.

III. JURISDICTION & VENUE

(7) The subject matter in controversy is within the jurisdictional limits of this Court. Plaintiff seeks monetary relief over $1,000,000.00 but not exceeding $5,000,000.00.

(8) This Court has jurisdiction over (a) Jamie, Monica and Ronald because they are residents of Texas and (b) Funimation because it has conducted business in Texas.

(9) Venue is proper in this Court under Texas Civil Practice and Remedies Code §15.017, because Vic lived in Tarrant County at the time his causes of action accrued.

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IV. FACTS

General Background

(10) Vic is a voice actor who has performed the voices of animated characters for over 22 years, mainly in "anime" productions.[1] Vic does not physically appear in these productions; only his voice is used for the English dubbing (or "revoicing" of the Japanese voice actors).

(11) Monica and Jamie also are voice actors; both have worked for Funimation. Ronald is Monica's fiancé.

(12) Funimation primarily dubs Japanese anime properties into English for distribution within the United States and provides streaming access subscription services to those properties via their website. In June 2017, Funimation contracted with Vic to provide the voice for dubbed anime properties it was distributing within the U.S.[2]

(13) For example, in 2018, Vic was cast as the English voice for "Broly," the lead character in the fantasy martial arts anime film *Dragon Ball Super: Broly*. The cast also included Monica. *Dragon Ball Super: Broly* was released in the U.S. on January 16, 2019 and was an instant financial success for Funimation, earning $7 million on its first day and $24 million within the first five days of its premiere.

(14) In addition to his voice work, Vic attends fan conventions, approximately 35-40 per year. He earns a sizeable income from appearance fees guaranteed by contract with the convention producers and from signing autographs, taking photos with fans, and

[1] Anime is a style of Japanese film and television animation often dubbed for U.S. audiences.

[2] Shortly thereafter, Sony Pictures Television, Inc., a Delaware corporation ("Sony"), acquired a 95% ownership interest in Funimation for $143 million (Funimation was valued at $150 million).

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appearing on guest panels. By January 16, 2019, he already had accepted invitations with dozens of conventions for appearances in 2019.

(15) On January 16, 2019, the day *Dragon Ball Super: Broly* released in the U.S., Monica "liked" and "retweeted" the Tweet of someone with the Twitter handle "hanleia" that accused Vic of being "a homophobic rude asshole who has been creepy to underage female fans for over ten years…."[3]

(16) The next day, Monica liked and retweeted two Tweets by Kaylyn Saucedo (who posts under the user name "Marzgurl") that accused Vic of "great volumes of sexual misconduct," urged Funimation to "reconsider hiring Vic Mignogna as a voice actor in the future," and initiated the hashtag "#KickVic."[4]

(17) The repeated attention that Monica, Jamie, and even Funimation's agents, employees or business partners, gave hanleia's and Marzgurl's accusations caused their Tweets to "go viral."[5] About the same time, one or more Defendants began actively defaming Vic directly to anime conventions, speaking of investigations and Vic being fired.

(18) Barely a week later, Tammi Denbow ("Denbow"), a Sony executive, informed Vic she was investigating three allegations of "sexual harassment" against him. One, Monica alleged to have occurred six years prior at a convention (not at any Funimation or Sony facility or event) when, after she wrote her name on a jelly bean and gave it to him, Vic ate

[3] Posts on the social media platform Twitter.com are called "Tweets"; persons "follow" Twitter users to track the content posted on the user's account. The terms "Tweet," "retweet" and variations thereof refer to the act of posting content on one's Twitter account. A user that "retweets" content shares another's Tweet to her or his followers; it is commonly understood that a retweet implies approval or support for the original Tweet. Additionally, Tweets can be "liked" which indicates the person "liking" the Tweet appreciates its content. Unless a Twitter account is private, all Tweets and "retweets" are visible to anyone on the internet.

[4] A hashtag is a word or phrase immediately preceded by the # symbol which is used to link Tweets containing the hashtag.

[5] To "go viral" means that a video, image, or story spreads quickly and widely on the Internet through social media, e-mail, or mobile phones.

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the jelly bean and joked that he "ate Monica"; Vic denied any sexual suggestion (he was joking in response to a fan's asking if he could be poisoned by the ink). Monica also alleged inappropriate conduct between Vic and two fans (not Funimation or Sony employees) at a convention three years prior (again not at any Funimation or Sony facility or event); Vic emphatically denied any inappropriate conduct. The third allegation involved a single, consensual kiss between Vic and a Funimation employee who was Vic's friend.

(19) Denbow's telling Vic that her investigation was "a confidential matter" did not stop Jamie, Monica, Ronald or other Funimation employees or business partners from urging anime conventions and other studios to terminate their contracts with Vic—telling some that Funimation was conducting an "investigation" into allegations that Vic was a "sexual predator" or that charges were being filed against Vic and he would soon be arrested—or tweeting details about the "investigation"; for example, Ronald would Tweet on February 2, 2019 that Vic "is a predator" based on his (Ronald's) "[i]nsider knowledge" about Sony's investigation.

(20) The fallout from the Defendants' actions was swift. On January 18, 2019, the Phoenix Fan Fusion convention cancelled Vic's appearance. A few days later, on January 26, 2019, Ronald tweeted that Vic was "a predator" (a charge Ronald would repeat in at least 15 more Tweets); shortly after, the Rangerstop Convention cancelled Vic's appearance.

(21) On January 29, 2019, Denbow and another Sony executive informed Vic that his employment with Funimation was terminated following Denbow's "investigation."

(22) On January 30, 2019, both the Anime NYC and the Anime Milwaukee conventions canceled Vic's appearances.

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(23) In January 31, 2019 Tweets, Ronald claimed to know of "at least 4 assaults" by Vic and crowed "I am glad to see conventions cancelled"; that day, Kawaiicon cancelled Vic's appearance.

(24) On February 1, 2019, Ronald tweeted he personally knew that Vic was "guilty of at least 4 accounts"; that day, the Kamehacon Dallas convention cancelled Vic's appearance (however, on March 24, 2019, Vic was re-invited to the Kamehacon Dallas convention).

(25) On February 2, 2019, Ronald tweeted that Vic needed to prove himself "not to be a predator." The next day, Ancient City Con cancelled Vic's appearance.

(26) On February 4, 2019, Ronald tweeted multiple times that Vic was "a predator," called Vic a "perp," and asserted there are "over 100 accounts and still more to come...." (*Figure 1*); that day, Denver Comicon cancelled Vic's appearance.

Figure 1

(27) On February 5, 2019, Funimation informed Anime News Network that Vic's employment had been terminated, and Ronald again tweeted his accusation that Vic is a "predator." Over the next 24 hours, Florida Supercon, Raleigh Supercon, Kamicon, and Hudson Valley Comicon all canceled Vic's appearances.

(28) On February 6, 2019, Ronald tweeted that over 100 women had made accusations "of assault," that the allegations against Vic were "corroborated," that "[there

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were] mountains of testimony," and that Funimation "have proof. That's why they fired him." Monica (Ronald's fiancé) also tweeted on February 6 that "IT HAPPENED TO ME!" and that "I'm only one voice on a sea of many … He's hurt enough people. He's a sick man and he needs help…." Later that day, Jamie attempted to rebuff those questioning the veracity of Monica's post on Twitter. (*Figure 2*).

Figure 2

(29) Two days later, Jamie tweeted that Vic had assaulted her several years prior by grabbing her hair and whispering in her ear (what he whispered she couldn't remember), that "[i]n the last week or so, I've heard accounts of him doing this exact thing to half a dozen other women that I personally know," and that Vic is a "predator."

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(30) On February 11, 2019, Funimation made its "investigation" public via Twitter, declaring it determined Vic had engaged in "harassment or threatening behavior"; Monica responded there were "multiple investigations with testimony, proof, evidence." (*Figure 3*).

Figure 3

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(31) Later that day, Monica declared that Vic is "the legal definition of harassment." (*Figure 4*).

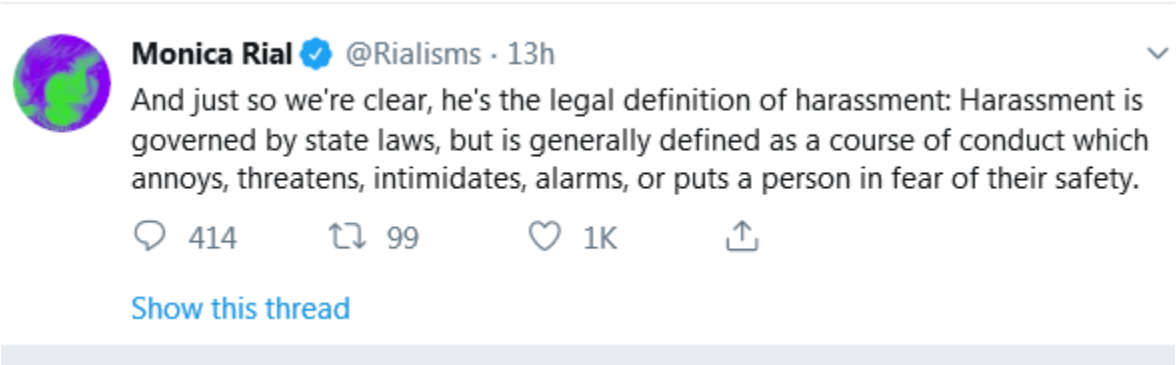

Figure 4

(32) Over the next week or so, Ronald tweeted "Evidence: He has been fired, there was an investigation … these actions have corroborated testimony," (February 13, 2019), "Their [Funimation's] decision was on things that happened to funimation employees," (February 18, 2019), and "let's see who walks away a registered sex offender" (February 16, 2019).

(33) On February 19, 2019, Monica tweeted a lengthy post in which she accused Vic of "sexual harassment," kissing her without her consent and treating others similarly at conventions; she claimed to have spoken with "investigators" to "corroborate" the "testimony" of others telling stories similar to hers and spoke of Funimation's "investigations" (*Figure 5*); she closed by referring to Vic as a "predator."

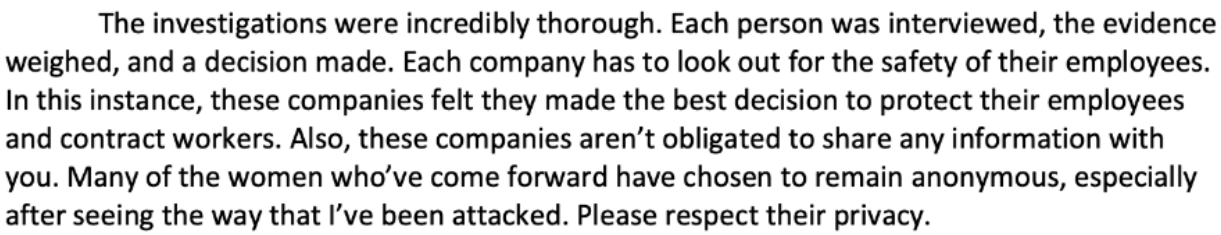

Figure 5

(34) Ronald continued carpet-bombing Vic on Twitter accusing him of "assaulting" Monica (February 21, 2019), of "cheat[ing] on his fiancé, assault[ing] ladies, [and] rob[bing]

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fans" and assaulting "way more people" than Monica (February 23, 2019), and of "forc[ing] himself on people in a sexual manner without consent and that resulted in assault" (April 7, 2019).

(35) In fact, Ronald has tweeted more than 80 times that Vic sexually assaulted or assaulted Monica, more than 10 times that Vic sexually assaulted or assaulted three of his "very close friends," more than 10 times that Vic has been accused of hundreds and possibly thousands of assaults, and at least 17 times that Vic is a "predator."

As the case entered the Motion to Dismiss phase, additional facts become clear.

(36) Apparently, the work environment at Funimation Productions, LLC was amorous and sexually-charged for years.[6] Its programming is still salacious or sexual, such as: "Panty & Stocking with Garterbelt" starring Jamie Marchi (also a writer) as "Panty" and Monica Rial as "Stocking," a show all about "sex and eating candy" and two fallen angels dressed as schoolgirls who use their lingerie as weapons to fight bad guys;[7] and "Prison School" where "[t]he school is ruled by a secret council of sadistic female students [and] boys are in for a world of hurt" (a "super raunchy anime series" and "Most Perverted Anime" show").[8]

[6] Exhibit I, Deposition of Monica Rial ("Monica's Deposition"), pp. 24:17 to 25:2; Exhibit K, Deposition of Vic Mignogna ("Vic's Deposition"), pp. 215:2-15; Unsworn Declaration of Chuck Huber ("Huber Declaration"), ¶¶38-42.

[7] www.funimation.com/shows/panty-stocking-with-garterbelt & www.ttdila.com/2012/07/anime-expo-2012-panty-and-stocking.html (both last checked 8/30, 2019).

[8] https://www.funimation.com/shows/prison-school/?qid=8dfcb17fa205984, https://www.ranker.com/list/dirty-anime-that-is-really-raunchy/leo-reyna, & https://www.thetoptens.com/perverted-anime-shows/ (all last checked 8/30/2019).

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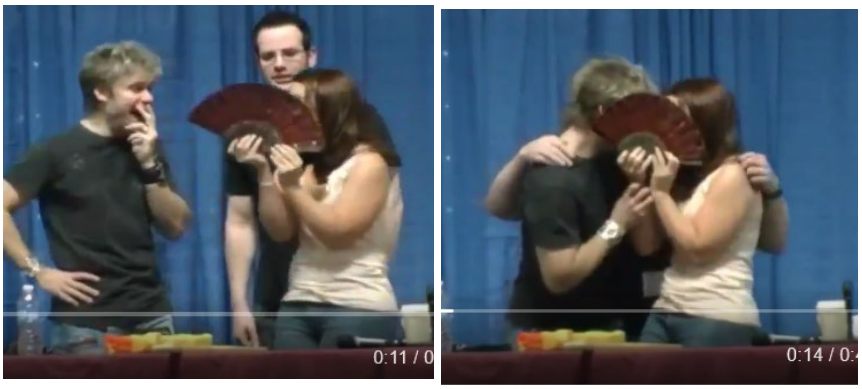
(37) At times, Funimation uses provocative imagery to promote its shows, such as Jamie and Monica in this promotion [*Figure 1*] for their show "Panty & Stocking with Garterbelt": [9]

Figure 1

(38) In fact, this raunchy environment at times rears its head at conventions attended by its voice actors, for example, Jamie "making out" with Vic [*Figures 2-3*] at the 2010 Con-Nichiwa convention in Tucson, Arizona,[10] or Monica being spanked at the 2011 Anime Detour convention in Minneapolis, Minnesota [*Figure 4*].[11]



Figures 2-3

Figure 4

(39) Despite @hanleia's January 16, 2019 tweet, rumors of Vic "being an asshole," "using fans," and "being a pedophile" were begun by Funimation's "de facto manager" Chris

[9] www.ttdila.com/2012/07/anime-expo-2012-panty-and-stocking.html (last checked 8/30, 2019); *see also* https://youtu.be/M3-EC3UdVps (video of Funimation's 2012 promotion of "Panty & Stocking"; *see also* Funimation's use of Jamie and a stripper pole to promote the show (https://www.facebook.com/funimation/photos/a.10150933484593481/10150935190178481/?type=3&theater).

[10] https://twitter.com/GameWizard02/status/1158106416252641280 (last checked 8/30/19).

[11] https://youtu.be/Q-HJ-1aQolk (last checked on 8/28/2019).

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Sabat, Monica and Jamie in the early 2000's, long before any posts or tweets cited by Defendants were made.[12] Funimation nevertheless claims the January 16, 2019 tweet from @hanleia[13] tagging it with the question "Hey @Funimation why do you employ a known pedophile" and linking to a post on "Pretty Ugly Little Liar" as initiated allegations against Vic and triggered its "investigation."[14] But @hanleia did not state that Vic is a "known pedophile"; and Vic has never been charged as such.[15] Indeed, on January 18, 2019, @MarzGurl posted "Hey, I just wanted to be certain, is it possible you were remembering voice actor Illich Guardiola?"—referring to a different former Funimation voice actor—**not Vic**—had been the one charged with sexually assaulting a minor.[16]

(40) On January 20, Vic tweeted unequivocal denials of @hanleia's charges and "sincerely apologize[d]" to anyone who felt he had been "less than kind and grateful" or whom he had made feel badly or uncomfortable; he finished with as clear a statement as possible:

> "Finally, any allegations of sexual harassment, sexual assault, or most disturbingly, pedophilia are COMPLETELY AND UTTERLY FALSE. My heart weeps for anyone who endures a violation of this kind, so to be accused of harming others in this way….I have no words."[17]

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[12] Huber Declaration, ¶¶11-13, 16-18, 22 and 48-50.

[13] The anonymous Twitter handle for "caitlin @ leon i have feelings 4 u." *See* https://twitter.com/hanleia (last checked 8/30/2019).

[14] "Pretty Ugly Little Liar" is a self-proclaimed "censorship-free forum." *See* https://prettyuglylittleliar.net.

[15] Vic's Deposition pp. 206: 5-6.

[16] https://prettyuglylittleliar.net/topic/3255-vic-mignogna/?page=13; Benton, M., "Police: Drama teacher who married 16-year-old girl faces charges," *Click2Houston.com* (2014), http://click2houston.com/news/texas/police-drama-teacher-who-married-16-year-old-girl-faces-charges; McCormack, S., "Sex Charges Dropped Against Drama Teacher Ilich Guardiola After He Married Teen," *Huffpost* (2014), https://www.huffpost.com/entry/ilich-guardiola_n_5799910; Loveridge, L., "Sexual Assault Charges Dropped Against Voice Actor Illich Guardiola," *Anime News Network* (2014), http://4NN.cx/.79624.

[17] *Defendant Funimation Productions, LLC's Motion to Dismiss Under the TCPA* ("Funimation's Motion"), p. 3. A 20-year veteran of the anime voice actor industry, Chuck Huber, also was not aware of any accusations or rumors

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(41) A few days later, on January 22, Ronald began telephoning and tweeting Christopher Slatosch, host of the Kameha Con convention; Ronald accused Vic of assaulting four people (Monica, "the two twins who lived with me," and "another voice actors [*sic*] girlfriend"), told Slatosch that Sony was conducting an investigation and that criminal charges would soon be filed against Vic.[18] Monica also telephoned Slatosch and called Vic a "sexual predator" and repeatedly asserted that criminal charges would soon be filed against him.[19]

(42) During these telephone conversations, Monica and Ronald both urged Slatosch to breach his contract with Vic—despite his explanation that doing so would breach his written contract with Vic—and to refuse continuing to do business with Vic in the future.[20] Ronald threated that Monica would cancel her appearance at Kameha Con and that his company would withdraw its financial sponsorship of the convention—Monica likewise threatened to convince other voice actors to cancel their appearances at Kameha Con—if Slatosch did not breach his written contract with Vic. [21]

(43) Due to Ronald's disclosure of Sony's investigation and his and Monica's pressure, Slatosch cancelled Vic's appearance at Kameha Con in breach of his written

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that Vic had sexually assaulted or harassed anyone prior to Defendants' claims. Huber Declaration at ¶¶52-57, 61-62 and 81.

[18] Unsworn Declaration of Christopher Slatosch ("Slatosch Declaration") at ¶¶6-7.

[19] *Id.*, at ¶9. Jamie and Monica both told Chuck Huber that criminal charges were being filed against Vic. Huber Declaration at ¶79.

[20] Slatosch Declaration at ¶¶7, 9, 12 and 16.

[21] *Id.*, at ¶¶9-11, 13, and Exhibit B attached thereto.

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agreement.[22] Slatosch eventually reinvited Vic to attend Kameha Con, but only after considerable expense by both sides and requiring Vic to pay for additional security (something not required of other guests).[23] Monica made good on her threat.[24]

(44) On January 23, Monica and Tammi Denbow, a Sony employee, exchanged email in which Monica thanks her for "making me feel at ease…and helping me realize it wasn't anything I did wrong," and Denbow is "glad it helped to talk it through."[25] On January 24, Ronald Toye tweeted that "I know with 100% certainty that [Vic] assaulted 4 people I love."[26]

(45) On January 25, Denbow contacted Vic; Funimation was conducting a "confidential" "investigation" into: Vic's writing Monica's name on a jellybean she threw to him at a convention (not at Funimation's offices) and then eating it;[27] his flirting with two adult women at a convention (not at Funimation's offices) who had been flirting with him for more than a year;[28] and a single, consensual kiss between Vic and a co-worker more than 3 years ago at Funimation's office (for which no complaint was ever made);[29] there was no

[22] *Id.*, at ¶¶3-4. Kameha Con was not the only convention to cancel due to Defendants' pressure; in fact, until Defendants' began defaming him, Vic had never had a convention cancel his appearance. Exhibit E, Unsworn Declaration of Victor Mignogna ("Vic's Declaration") ¶36.

[23] *Id.*, at ¶14.

[24] *Id.*, at ¶11, 15.

[25] Exhibit A, RIAL000014.

[26] Exhibit J, Deposition of Ronald Toye ("Ronald's Deposition"), pp. 36:5–38:20; Ronald's Deposition, Exhibit 38 at 3.

[27] Monica testified that this jellybean incident took place "like 15 years ago." Monica's Deposition, pp. 33:6-13.

[28] Vic testified this occurred "several years ago." Vic's Deposition, pp. 126:15-17.

[29] Vic testified this occurred in "2015 or 2016." *Id.*, pp. 120:15-18.

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allegation of abuse, assault or harassment.[30] That day, Ronald tweeted "[Vic] assaulted [4 people very close to me]."[31]

(46) On January 26, Ronald declared that Vic "is guilty" of "sexual assault" and that Vic is a "predator."[32] Two days later (January 28), Ronald publicly stated that Vic is "a man with a clear history of [sexual] deviancy."[33] The next day (January 29), Funimation informed Vic that his contract with Funimation was terminated but gave him no reason for the termination.[34] On January 30, Monica emailed Denbow thanking her for a January 29th voice mail "update" and "for being so kind"; Monica also exchanged six emails with Lisa Gibson that day during which Monica asked Gibson what she could say publicly, broached when Funimation would "make a statement," and thanked Gibson for her "update," and Gibson encouraged Monica to "hang in there."[35] On January 31, Monica had a telephone call with Gibson and Sony's Scott Barretto; and Ronald tweeted "I know of at least 4 assaults … I am glad to see conventions cancelled and the truth coming to light."[36]

(47) Three days after her telephone calls with Funimation executives Gibson and Barretto (February 3), Monica mirrored Ronald's language when she tweeted "[t]he truth

[30] Vic's Declaration at ¶10; Affidavit of Tammi Denbow attached to Funimation's Motion, at ¶¶1-4. Chuck Huber also was told that Funimation's investigation was "confidential." Huber Declaration at ¶82.

[31] Ronald's Deposition, Exhibit 38 at 5-6.

[32] Ronald's Deposition, Exhibit 38 at 7, 13.

[33] Ronald's Deposition, Exhibit 38 at 15.

[34] Funimation's Motion, p. 4; Affidavit of Tammi Denbow attached to Funimation's Motion, at ¶8; Vic's Deposition, pp. 133:14–23, 134:7–135:2.

[35] Exhibit A, RIAL000038-39, RIAL000059.

[36] Exhibit A, RIAL000038; Ronald's Deposition, Exhibit 38 at 16.

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will come out."[37] That day, Vic publicly denied his detractors' allegations.[38] Wasting no time, on February 4, Ronald mocked Vic's apology and publicly claimed "I know without a question he hurt people very close to me. Those tears are fake."[39] He then declared there were "over 100 ladies and counting coming forward" with accusations against Vic.[40]

(48) The next day (February 5), Ronald publicly called on Funimation to make a public statement about Vic and for Vic to "be banned indefinitely,"[41] again publicly calling Vic "a predator."[42] On February 6, Ronald again publicly accused Vic of "assault[ing] my fiancée,"[43] declared there are "over 100 accounts of assault" and called Vic a "rapist,"[44] made it clear that the objective was Vic "being blacklisted and out of work,"[45] and predicted that the proof of allegations against Vic "will be him getting fired from everything."[46]

(49) The next day (February 7), in an email to Funimation's Trina Simon, Monica accused Vic of sexually assaulting her in 2007;[47] as if synchronized, Jamie tweeted the same day that Vic is "a monster…there are dozens upon dozens of reports,"[48] and Ronald again

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[37] Exhibit L [Monica's Feb. 3 tweet to @MorphBox, @DBZUk_kamehouse].

[38] https://youtu.be/SsTylbn74aQ (last checked 8/28/19). Chuck Huber, likewise, notes that voice actors often hug fans at conventions regardless of age and that he always saw Vic stopped if someone "acted like they did not want to be hugged or kissed." Huber Declaration at ¶¶65 and 79.

[39] Ronald's Deposition, Exhibit 28 at 30.

[40] Ronald's Deposition, Exhibit 28 at 35.

[41] Ronald's Deposition, Exhibit 28 at 37, 39 and 44.

[42] Ronald's Deposition, Exhibit 28 at 38.

[43] Ronald's Deposition, Exhibit 28 at 47. Monica is Ronald's fiancée. Monica's Deposition, pp. 22:10-20.

[44] Ronald's Deposition, Exhibit 28 at 50 and 79.

[45] Ronald's Deposition, Exhibit 28 at 57 and 68.

[46] Ronald's Deposition, Exhibit 28 at 75.

[47] Exhibit A at RIAL000002-000003.

[48] Exhibit M attached hereto.

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publicly called on Funimation to make a statement.[49] Jamie then revealed their plan: use "name and shame" to destroy Vic's reputation.[50]

(50) On February 8, Vic tweeted that he did not want anyone claiming to support him making threats: LET ME BE PERFECTLY CLEAR that I would NEVER condone anything approaching this whatsoever, and I call upon anyone doing it to STOP THIS IMMEDIATELY."[51] That same day, Monica and Funimation's Coleen Carroll mocked Vic for his private email to Monica explaining that he has always considered her a "dear friend" and asking her to tell him what he had done to make her so angry.[52]

(51) The next day (February 9), Jamie tweeted that Vic assaulted her—she could not remember when—by grabbing her hair and whispering something in her ear that she could not remember then stating that Vic had done "this exact thing to half a dozen other women that I personally know" and that he's a "predator."[53]

(52) Two days later (February 11), Funimation tweeted that "[f]ollowing an investigation…Funimation will not be engaging Mignogna in future productions…We do not condone any kind of harassment or threatening behavior being directed at anyone"; Monica added to Funimation's tweet that "[t]here were multiple investigations with testimony, proof,

[49] Ronald's Deposition, Exhibit 28 at 84.

[50] Exhibit G attached hereto at 1.

[51] Funimation's Motion at p. 5.

[52] Exhibit A at RIAL000001.

[53] Exhibit Q attached hereto. However, in her recent affidavit, she suddenly remembers that this event allegedly occurred in "approximately 2011" but still does not remember what Vic allegedly whispered in her ear. *Defendant Jamie Marchi's Motion to Dismiss Pursuant to the Texas Citizens Participation Act*, Affidavit of Jamie Marchi at ¶2.

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evidence…I am one of dozens of men and women who participated."[54] Later that day, Monica tweeted, "[a]nd just so we're clear, he's the legal definition of harassment."[55]

(53) Funimation's Twitter followers knew exactly what Funimation was saying: the result of its investigation was that Vic had engaged in "harassment or threatening behavior"—particularly since Monica had reinforced it with her description of "multiple investigations with testimony, proof, evidence…I am one of dozens of men and women who participated."[56] Oddly, Funimation has never contradicted or corrected Monica's "signal boosting."[57]

(54) Two days later (February 13), Vic tweeted that he "had no idea that any animosity" towards him had existed until "these last few weeks" and apologized if he had made anyone feel uncomfortable and begged for people to "please be kind to one another. The very last thing I want is for ANYONE to be hatefully targeted—especially not on my behalf."[58]

(55) On February 16, Ronald tweeted that Vic would be "a registered sex offender."[59] Two days later (February 18), he confirmed that Monica was a Funimation employee.[60] The next day, Monica tweeted that Vic had been accused of sexual harassment, alleged Vic had grabbed her hair and whispered in her ear (without recalling what was said)

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[54] Funimation's Motion, Exhibit L; Monica's Deposition, Exhibit 31.

[55] Monica's Deposition, Exhibit 31.

[56] Huber Declaration at ¶82; Exhibit N attached hereto.

[57] Signal boosting means "[p]osting to a community forum (mailing list, social networking site, discussion board) in hopes of getting more attention for an event or cause. This is not the primary or first announcement, but rather one of many auxiliary posts or cross-posts to communities with individuals who are likely to take interest." *See* https://www.urbandictionary.com/define.php?term=signal%20boost (definition of "signal boosting").

[58] Funimation's Motion at p. 7.

[59] Ronald's Deposition, Exhibit 28 at 209.

[60] Ronald's Deposition, Exhibit at 247.

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and claimed she "witnessed" him do it "to so many people," she claimed he had forced a kiss on her in "[i]n the mid-2000s," and called him a "predator."[61] Later, in her deposition and her motion to dismiss, Monica expanded on her forced kiss story claiming Vic invited her to his hotel room, threw her on his bed and forcibly kissed her, and that Stan Dahlin witnessed her leaving Vic's hotel room.[62] Both Vic and Mr. Dahlin expressly deny Monica's allegations.[63]

(56) On February 19, Ronald suddenly switched from calling Vic a predator, registered sex offender and accusing him of assault and harassment to towing the line that Funimation would henceforth use: Vic had been terminated by Funimation for "inappropriate conduct."[64]

V. CONDITIONS PRECEDENT

(57) All conditions precedent to Plaintiff's claims and damages have occurred or been performed.

VI. CLAIMS

A. Defamation

(58) The preceding paragraphs are incorporated by reference.

(59) The Defendants have tweeted false, defamatory statements about Vic that were published and read by third parties. Indeed, many of the Defendants' tweets are defamatory *per se*. The Defendants knew these statements were false or made them with negligent

[61] Monica's Deposition, Exhibit 33.

[62] *Monica Rial and Ron Toye's Motion to Dismiss Pursuant to the Texas Citizens Participations Act* at ¶20; Monica's Deposition at 31:1-8.

[63] Vic's Declaration at 2-8; Exhibit E, Affidavit of Stan Dahlin, Exhibit O.

[64] Ronald's Deposition, Exhibit 28 at 275.

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disregard for their truthfulness. Due to the Defendants' defamation, Vic has suffered actual and consequential damages in excess of the minimal jurisdictional amounts of this Court as well as damage to his reputation.

(60) The Defendants' conduct was willful, fraudulent, malicious and in wanton disregard for Vic thereby entitling him to punitive damages in an amount to be determined at trial.

B. Tortious Interference with Existing Contracts

(61) The preceding paragraphs are incorporated by reference.

(62) Vic enjoyed contracts with multiple conventions prior to the Defendants' tortious conduct. Defendants knew of these contracts. However, the Defendants willfully and intentionally interfered with these contracts proximately causing cancellation, termination, even breach, of these contracts by the convention producers thereby causing Vic actual and consequential damages in excess of the minimal jurisdictional amounts of this Court.

(63) The Defendants' conduct was willful, fraudulent, malicious and in wanton disregard for Vic thereby entitling him to punitive damages in an amount to be determined at trial.

C. Tortious Interference with Prospective Business Relations

(64) The preceding paragraphs are incorporated by reference.

(65) There was reasonable probability that Vic would have entered into agreements with other production companies and conventions, as he had in prior years. The Defendants knew of these relationships; however, the Defendants' unlawful and independently tortious actions prevented these agreements from occurring. The Defendants' actions were not merely

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an incidental result but were unlawful and taken without justification or cause; indeed, the Defendants were motivated by malice. The Defendants' tortious interference proximately caused Vic actual and consequential damages, including lost profits, in excess of the minimal jurisdictional amounts of this Court.

(66) The Defendants' conduct was willful, fraudulent, malicious and in wanton disregard for Vic thereby entitling him to punitive damages in an amount to be determined at trial.

D. Civil Conspiracy

(67) The preceding paragraphs are incorporated by reference.

(68) The Defendants conspired and acted in concert to defame Vic, unlawfully (or, alternatively, lawfully by unlawful means) interfere with his existing contracts, and unlawfully (or, alternatively, lawfully by unlawful means) interfere with his prospective business relations, and each knowingly assisted and participated in the other's actions. The Defendants' civil conspiracy proximately caused Vic actual and consequential damages (according to the claims alleged above), including lost profits, in excess of the minimal jurisdictional amounts of this Court for which each of the Defendants is jointly and severally liable with the other Defendants.

(69) The Defendants' conduct was willful, fraudulent, malicious and in wanton disregard for Vic thereby entitling him to punitive damages in an amount to be determined at trial for which each of the Defendants is jointly and severally liable with the other Defendants.

E. Vicarious Liability

(70) The preceding paragraphs are incorporated by reference.

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(71) At all times relevant, (i) Jamie or Monica was Funimation's employee and acting in the course and scope of her employment in the conduct alleged above or, alternatively, (ii) Jamie, Monica or Ronald was Funimation's agent with actual or apparent authority to act on behalf of Funimation in the conduct alleged above or Funimation ratified her or his actions alleged above. Accordingly, Funimation is liable for the conduct of Jamie, Monica or Ronald alleged above.

VII. PRIMA FACIE EVIDENCE

(72) Plaintiff has attached to this Second Amended Petition and to other pleadings in this case, prima facie evidence sufficient to prove each element of each claim.

(73) Exhibit A is a timeline and a series of email communications between Monica Rial that shows numerous email communications between Funimation management and Rial both before and after Vic was terminated and Funimation made its defamatory tweets on February 11, 2019. This evidence is sufficient to support a rational inference that Funimation and Rial were colluding and conspiring to commit the torts complained of in Section VI.

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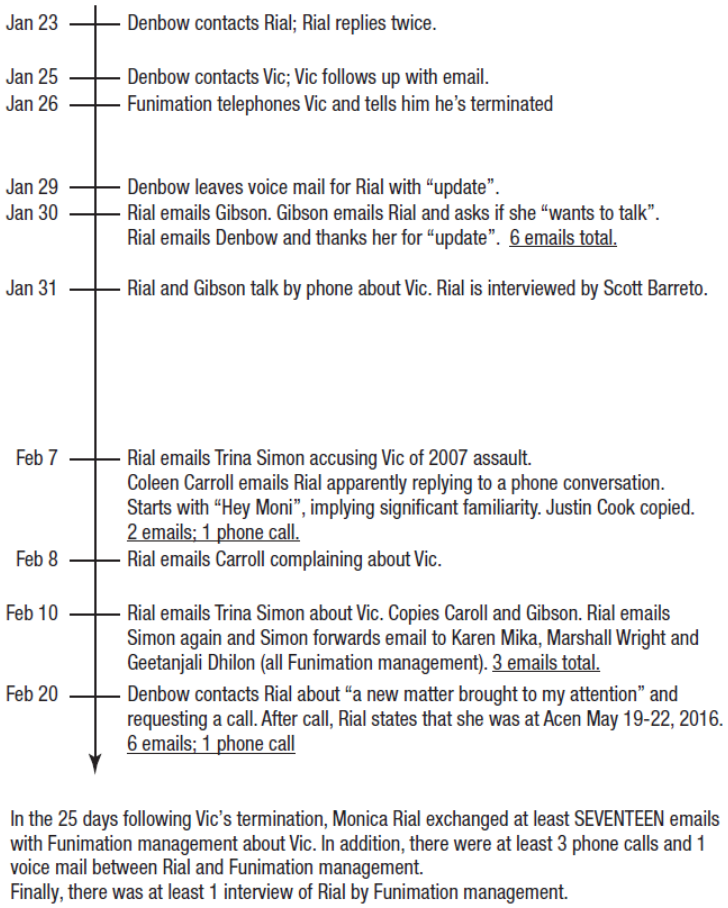

(74) Exhibit B contains multiple tweets made in response to Funimation's February 11, 2019 tweets. These tweets are sufficient to support a rational inference that people of ordinary intelligence understood Funimation's February 11, 2019 tweets to state that Funimation's investigation had determined that Plaintiff committed sexual assault or harassment.

(75) Exhibit C is the unsworn declaration of Christopher Slatosch that includes actual text messages in which Ronald and Monica defame Vic and, knowing of the contract between Vic and Mr. Slatosch's convention (which Mr. Slatosch attaches to his declaration), tortiously interfere with that contract as well as with prospective business relations between Vic and Mr. Slatosch's convention. Mr. Slatosch's declaration also describes Monica and

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Ronald working together to accomplish these objectives (defame Vic, tortiously interfere with an existing contract, and tortiously interfere with prospective business relations) and thus shows their conspiracy. This evidence is sufficient to support a rational inference that Monica and Ronald committed defamation, tortious interference with existing contract, tortious interference with prospective business relations and civil conspiracy to commit those torts.

(76) Exhibit D contains the unsworn declaration of Chuck Huber. Mr. Huber describes how the Defendants (rather than @hanleia) contrived the allegations that Vic was a pedophile and a homophobe and misused his fans. Mr. Huber describes the conspiracy inside Funimation, involving all Defendants, to "get" Vic. Mr. Huber details false statements that Defendants made about Vic (such as criminal charges being made). This evidence is sufficient to support a rational inference that the Defendants committed defamation, tortious interference with existing contract, tortious interference with prospective business relations and civil conspiracy to commit those torts.

(77) Exhibit E contains the unsworn declaration of Plaintiff, in which he (a) denies the allegations made by Defendants in their answers and motions to dismiss; (b) quantifies the economic harm caused by Defendants' actions, and (c) states the non-economic damages that Defendants' actions caused him. Plaintiff's declaration sufficient to support a rational inference that Defendants knew the falsity of their statements when those statements were made and that he has suffered damages due to Defendants' tortious conduct.

(78) Exhibit F contains a series of tweets showing that Jamie was a member of a private discord server devoted to defaming the Plaintiff.[65] The eponymous name of the server

[65] A discord server is a private chat room where members can message one another in real time. The messages are not saved, but Exhibit F shows screenshots of messages. Jamie Marchi is known as "She Devil" in this forum.

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was "KickVicSupportGroup." This evidence is sufficient to support a rational inference that Marchi committed defamation, tortious interference with existing contract, tortious interference with prospective business relations and civil conspiracy to commit those torts.

(79) Exhibit G contains a series of tweets by Jamie calling Plaintiff a liar and accusing him of being a sexual predator as well as stating that "I want his [Plaintiff's] head. I want his balls. I want him to feel an ounce of the pain he's cause [sic] others and then fucking choke on it…." This evidence is sufficient to support a rational inference that Jamie committed defamation, tortious interference with existing contract, tortious interference with prospective business relations and civil conspiracy to commit those torts. It also supports a rational inference that Jamie engaged in her tortious conduct with actual malice toward Vic.

(80) Exhibit H contains a series of private messages sent by Jamie stating, *inter alia*, that Plaintiff has a "15+ history of harassment". This evidence is sufficient to support a rational inference that the Marchi defamed Vic.

(81) Exhibit I contains Monica's deposition in which, *inter alia*, she confirms her intimate involvement in Funimation's "investigation" and decisions following termination of Vic's relationship with Funimation, evidence that is sufficient to support a rational inference that Monica and Funimation were engaged in a civil conspiracy to defame Vic and tortiously interfere with his existing and prospective business relations.

(82) Exhibit J contains Ronald's deposition, and the exhibits attached thereto. Exhibit 28 contains hundreds of Ronald's defamatory tweets as well as tweets that confirm (a) he, Monica and Jamie sought to have Vic banned from future work and future conventions, (b) he had inside knowledge of Funimation's "investigation" into allegations against Vic and the timing of Funimation's defamatory tweets (information he could only

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have received directly or indirectly from Funimation), and (c) he considered Monica a Funimation employee. This evidence is sufficient to support a rational inference that Ronald defamed Vic and engaged in a civil conspiracy with the other Defendants to defame Vic and tortiously interfere with his existing and prospective business relations; it is also sufficient to support a rational inference that Monica either was an employee or agent of Funimation making Funimation vicariously liable for her tortious conduct. Ronald's tweets also support a rational inference that he engaged in his tortious conduct with actual malice toward Vic.

(83) Exhibit K contains the deposition of Plaintiff in which he denies the allegations that Defendants levied against him which is sufficient evidence at this stage to prove the falsity of Defendants' defamatory tweets. Plaintiff's testimony also constitutes evidence that is sufficient to support a rational inference that Funimation and the other Defendants tortiously interfered with his existing and prospective business relations and caused him damage.

(84) Exhibit L contains a tweet by Monica made three days after her telephone calls with Funimation executives Gibson and Barretto whereby she mirrors Ronald's language that "[t]he truth will come out." This evidence is sufficient to support a rational inference that Monica was provided inside information about and participated in Funimation's plans to issue tweets that would defame Vic, hence, sufficient to support a rational inference of civil conspiracy to defame Vic. Further, it's sufficient to support a rational inference that Monica was acting as Funimation's agent, having confidential knowledge of Funimation's plans, when she tweeted the "truth" will come out.

(85) Exhibit M contains Jamie's tweet that appears to be synchronized with similar tweets by Ronald and Monica that Vic is "a monster…there are dozens upon dozens of reports…." This evidence is sufficient to support a rational inference that Jamie defamed Vic

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and conspired with Ronald and Monica to do so. It further shows Jamie's claimed inside knowledge as both Monica and Ronald claimed to have ("dozens upon dozens of reports"), which supports the rational inference that Funimation had shared confidential knowledge with Jamie, which supports the rational inference that Jamie was conspiring with the other Defendants to defame Vic and and tortiously interfere with his existing and prospective business relations. It is also sufficient to support a rational inference that Jamie either was an employee or agent of Funimation making Funimation vicariously liable for her tortious conduct.

(86) Exhibit N contains tweets by Monica following up on Funimation's tweets alleging that the result of its investigation was that Plaintiff had engaged in "harassment or threatening behavior." Monica reinforced that understanding of Funimation's tweets with her description of "multiple investigations with testimony, proof, evidence…I am one of dozens of men and women who participated." This evidence is sufficient to support a rational inference that Monica defamed Vic. This evidence also is sufficient to support a rational inference that Monica was provided inside information about and participated in Funimation's plans to issue tweets that would defame Vic, hence, sufficient to support a rational inference of civil conspiracy to defame Vic. Further, it's sufficient to support a rational inference that Monica was acting as Funimation's agent, particularly since Funimation has never issued a statement contradicting Monica's description of the investigation.

(87) Exhibit O contains an affidavit by Stan Dahlin that completely contradicts Monica's claims that Plaintiff assaulted her at a convention in 2007. This evidence is

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sufficient to support a rational inference that Monica's defamation of Vic was made with actual malice (*i.e.*, she knew that her statements were false).

(88) Exhibit P contains an unsworn declaration by Erica McCord that completely contradicts Faisal Ahmed's affidavit attached to *Monica Rial and Ron Toye's Motion to Dismiss Pursuant to the Texas Citizens Participations Act*. This evidence is sufficient to support a rational inference that Monica's defamatory statements about Vic were made with actual malice (*i.e.*, she knew that her statements were false).

(89) Exhibit Q contains a tweet by Jamie stating that Plaintiff assaulted her—she could not remember when—by grabbing her hair and whispering something in her ear that she could not remember then stating that Vic had done "this exact thing to half a dozen other women that I personally know" and that he's a "predator." Vic has denied any such conduct, and the unsworn declaration of Chuck Hubert undermines Jamie's claim she was too afraid to come forward. This evidence is sufficient to support a rational inference that Jamie defamed Plaintiff with actual malice.

VIII. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that, on final hearing, he have judgment against the Defendants for actual, consequential and punitive damages according to the claims pled above and in amounts to be determined on final hearing, pre- and post-judgment interest at the highest rate permitted by law, and costs of court. Plaintiff prays for such other and further relief to which he may be justly or equitably entitled. Plaintiff prays for general relief.

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Respectfully submitted,
BEARD HARRIS BULLOCK HUGHES

By: */s/ Ty Beard*

Ty Beard
Texas Bar No. 00796181
Carey-Elisa Christie
Texas Bar No. 24103218
Kristina M. Ross
Texas Bar No. 24069173
Jim E. Bullock
Texas Bar No. 00795271
100 Independence Place, Suite 101
Tyler, Texas 75703
(903) 509-4900 [T]
(903) 509-4908 [F]
Ty@beardandharris.com
Carey@beardandharris.com
Kristina@beardandharris.com
Jim@beardandharris.com

Attorneys for Plaintiff

Certificate of Service

The undersigned certifies that the foregoing motion was electronically filed today and served via electronic filing manager on counsel of record.

/s/ Ty Beard
Date: September 2, 2019

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Exhibit A

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Jan 23 — Denbow contacts Rial; Rial replies twice.

Jan 25 — Denbow contacts Vic; Vic follows up with email.

Jan 26 — Funimation telephones Vic and tells him he's terminated

Jan 29 — Denbow leaves voice mail for Rial with "update".

Jan 30 — Rial emails Gibson. Gibson emails Rial and asks if she "wants to talk".
Rial emails Denbow and thanks her for "update". 6 emails total.

Jan 31 — Rial and Gibson talk by phone about Vic. Rial is interviewed by Scott Barreto.

Feb 7 — Rial emails Trina Simon accusing Vic of 2007 assault.
Coleen Carroll emails Rial apparently replying to a phone conversation.
Starts with "Hey Moni", implying significant familiarity. Justin Cook copied.
2 emails; 1 phone call.

Feb 8 — Rial emails Carroll complaining about Vic.

Feb 10 — Rial emails Trina Simon about Vic. Copies Caroll and Gibson. Rial emails Simon again and Simon forwards email to Karen Mika, Marshall Wright and Geetanjali Dhilon (all Funimation management). 3 emails total.

Feb 20 — Denbow contacts Rial about "a new matter brought to my attention" and requesting a call. After call, Rial states that she was at Acen May 19-22, 2016.
6 emails; 1 phone call

In the 25 days following Vic's termination, Monica Rial exchanged at least SEVENTEEN emails with Funimation management about Vic. In addition, there were at least 3 phone calls and 1 voice mail between Rial and Funimation management.
Finally, there was at least 1 interview of Rial by Funimation management.

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From: "Denbow, Tammi" <Tammi_Denbow@spe.sony.com>
Subject: Re: Confidential Discussion
Date: January 24, 2019 at 11:38:10 AM CST
To: Monica Rial <monicarial@yahoo.com>

Thanks, Monica. I'll add this information to my file.

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, January 23, 2019 8:03 PM
To: Denbow, Tammi
Subject: Re: Confidential Discussion

Sorry Tammi,

I remembered one more thing:

My friend who worked at Funimation when she was forcibly kissed on-site, reported it to her supervisors but she wanted assurance that she would remain anonymous. They said they couldn't promise her report would remain anonymous and that's why she's reluctant to say anything now. She no longer works for Funimation.

Thank you,
~ Monica Rial ~

On Jan 23, 2019, at 7:25 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:

> Hi, Monica.
>
> Thanks for the additional info.
>
> I'm glad it helped to talk through it. If you think of anything else, please feel free to reach out.
>
> Thanks, again!
>
> Tammi
>
> ---
>
> **From:** Monica Rial <monicarial@yahoo.com>
> **Sent:** Wednesday, January 23, 2019 5:20 PM
> **To:** Denbow, Tammi <Tammi_Denbow@spe.sony.com>
> **Subject:** Re: Confidential Discussion
>
> Hi Tammi,
>
> I just thought of something else. He was recording a game recently at a studio called Okratron 5000 with a gentleman named Donald Schultz. Donald said he went on a rant about how "silence equals consent" during the session. They may have audio at Okra, I'm not sure.
>
> Thank you again for making me feel at ease. This has brought up all kinds of skeletons from my past. Thank you for helping me realize it wasn't anything I did wrong. I really appreciate it.
>
> Thank you,
> ~ Monica Rial ~
>
> On Jan 23, 2019, at 6:20 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:
>
> > Hi Monica.

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Thanks for being so flexible. I'm back in my office, so can call now if you're still available.

Thanks,

Tammi

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, January 23, 2019 4:05 PM
To: Denbow, Tammi
Subject: Re: Confidential Discussion

Hi Tammi,

I wanted to give you some other options in case today doesn't work out for you. Here's my availability the next few days:

Today: anytime
Thursday: anytime after 6:30pm (Pacific)
Friday: between 8am-1pm (Pacific)

If these times don't work for you, just let me know and I'll get you my availability for next week.

Thank you,
~ Monica Rial ~

On Jan 23, 2019, at 3:28 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:

> Hi, Monica.
>
> I need to speak to you regarding the concerns you raised to Colleen. My role at Sony is to look into these types of concerns and ensure they are addressed appropriately. It's best if we schedule a 30-minute appointment to ensure we have privacy for the call. Or, if you are in the LA area and prefer to come to my office at the Sony Studio, we can do that as well. I'm including my availability below for your convenience, but can also be available outside of my normal business hours with advanced notice. My schedule is subject to change, so please respond with a time when you are available and I will confirm.
>
> Today 1/23 3:30-5:30 p.m. Pacific (in person or by phone)
> Thu 1/24 11 a.m. – 5 p.m. Pacific (phone only)
> Fri 1/25 9:30 a.m. – 6 p.m. Pacific (in person or by phone)
>
> If you aren't available any of these times, please let me know and I will update with my schedule for next week.
>
> I look forward to speaking with you soon.
>
> Thanks,
>
> Tammi
>
> Tammi Denbow
> Executive Director, P&O
> Sony Pictures Entertainment
> 10202 West Washington Blvd.
> Culver City, CA 90232
> (310) 244-2907
> Tammi_Denbow@spe.sony.com

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From: Lisa Gibson <Lisa.Gibson@funimation.com>
Subject: Re: I don't know what to do.
Date: January 30, 2019 at 8:47:05 PM CST
To: Monica Rial <monicarial@yahoo.com>

Sounds good. Hang in there!

Lisa Gibson
VP of Brand Marketing
972-537-0912 Ext 4912
Lisa.Gibson@funimation.com

From: Monica Rial <monicarial@yahoo.com>
Date: Wednesday, January 30, 2019 at 8:46 PM
To: Lisa Gibson <Lisa.Gibson@funimation.com>
Subject: Re: I don't know what to do.

Thank you.

I'm free after 12:30 tomorrow. I know Barretto has an interview for me to do but we haven't locked down a time. My number is [redacted].

Thank you,
~ Monica Rial ~

On Jan 30, 2019, at 8:43 PM, Lisa Gibson <Lisa.Gibson@funimation.com> wrote:

> There is no "off duty" with this job.
>
> I'd love to talk. My cell is [redacted]. Tomorrow works. Let me know when you're available and we'll figure it out.
>
> Lisa Gibson
> VP of Brand Marketing
> 972-537-0912 Ext 4912
> Lisa.Gibson@funima ion.com
>
> **From:** Monica Rial <monicarial@yahoo.com>
> **Date:** Wednesday, January 30, 2019 at 8:37 PM
> **To:** Lisa Gibson <Lisa.Gibson@funimation.com>
> **Subject:** Re: I don't know what to do.
>
> Sorry to bug you with this when you're off duty. I didn't expect you to see it until tomorrow.
>
> I know you guys are in a precarious position and I don't want to put you in an awkward situation. That said, I would really appreciate it if we could talk tomorrow. If only because I don't know how to respond to questions. If not, I totally understand.
>
> Thank you,
> ~ Monica Rial ~
>
> On Jan 30, 2019, at 7:34 PM, Lisa Gibson <Lisa.Gibson@funimation.com> wrote:
>
> > I just saw this. Do you want to talk? Tonight or tomorrow?
> >
> > Get Outlook for iOS

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Lisa Gibson
VP of Brand Marke ing
972-537-0912 Ext 4912
Lisa.Gibson@funimation.com

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---

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, January 30, 2019 6:35 PM
To: Lisa Gibson
Subject: I don't know what to do.

Hi Lisa,

I'm writing because I'm at a loss. I know the investigation is over and I was told "We are no longer engaging with Vic Mignogna" countless times. I just don't know what to say when people ask me about it. This experience has brought up all kinds of emotions and now I'm being bombarded by folks online with questions about it. I understand you may not know what to tell me, and that's fine, but I don't know where to turn. I can't even look at social media anymore. I get so angry and upset I want to speak out but I don't know what I can say. I asked Justin about it but he hasn't gotten back to me. I understand if Funi is waiting to make a statement after Broly has finished its run. Hell, I understand if Funi doesn't want to make a statement at all. The thing is, I don't have that choice. They will just keep bombarding me with questions. Sorry to bother you with this but I don't know where to go from here.

Thank you,
~ Monica Rial ~

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From: "Denbow, Tammi" <Tammi_Denbow@spe.sony.com>
Subject: RE: Thank you.
Date: January 30, 2019 at 12:05:00 PM CST
To: Monica Rial <monicarial@yahoo.com>

Hi, Monica.

Thank you for confirming. If you have any questions, or if you have any additional concerns, please feel free to give me a call.

Have a fabulous day!

Tammi

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, January 30, 2019 9:56 AM
To: Denbow, Tammi <Tammi_Denbow@spe.sony.com>
Subject: Thank you.

Hi Tammi,

I received your voice mail yesterday. Thank you for keeping me updated. And thanks again for being so kind.

Thank you,
~ Monica Rial ~

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From: Monica Rial <monicarial@yahoo.com>
Subject: ATTORNEY CLIENT PRIVILEGE
Date: February 7, 2019 at 9:08:04 PM CST
To: Trina.simon@funimation.com

Hello Trina,

My name is Monica Rial and I am a contract voice actor for Funimation. As you know one of Funimation's other voice actors, Vic Mignogna, was accused of sexual harassment and assault. I am one of his accusers- he assaulted me in 2007 and has harassed me since the early 2000s. I shared my story with investigators because although it is well past the statute of limitations, it would corroborate other testimony. I posted an image on Twitter saying something to the effect of "I support victims". Several of my friends also posted messages of support. Due to this outpouring of support, Vic's fans started viciously attacking my friends and me. We have received death threats online and via text (see below), and now bizarre phone calls. I have now received 3 phone calls:

At 4:50 pm today, February 7, I received a call from Sean Schemmel, or at least it appeared that way. His name was definitely on the screen but when I answered it was the deep voice of an African-American man. He said, "Yo why you keep calling me?" I laughed thinking maybe Sean was doing an impression or something. Then the voice said, "You're a liar and I don't like fucking liars". I laughed out of nervousness and I questioned, "Sean? What?" Then the voice said, "Why you laughing? You ain't gonna be laughing for long". I sat in silence for a moment and then hung up. I then texted Sean (see text image below) and subsequently called him and learned that he had received a call from MY number asking about drugs which he joked about and laughed off.

I contacted Colleen Clinkenbeard who, in turn, contacted Justin Cook and Karen Mika. The experience, on top of all the threats, scared me. I'm scared because obviously someone found my number on the internet and since I'm a homeowner my address is public record. I am afraid for my safety. I was told to contact you and I began writing this email. While working on it, I received 2 more phone calls; one that appeared to be from my brother Miguel Rial and the other from Colleen Clinkenbeard. The first call had the same recorded message as the earlier call. The second call had a new message from another voice calling themselves "Putin" but it sounded to be prerecorded as well.

I have filed a report with the Richardson Police Department (the city where I live) and that report number is 201900013396. The attending officer is Officer Shacora Bunting (Badge # 1287) and her email is Shacora.Bunting@COR.gov.

I understand that this will probably be written off as internet bullying and pranks but I am legitimately concerned for my safety. I'm being blamed for this man's removal from companies even though he was fired as a result of internal investigations. I feel as though Funimation is more concerned with my assaulter's safety than mine. My fiancee has been very vocal on Twitter and is

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gathering any evidence of threats made against me. Please understand that he is concerned for my safety as well as that of his son who lives with us.

Vic has continually been vocal on the app Unlocked and on his website The Risembool Rangers. He has asked his fans to attack his detractors. He is responsible for this attack on me and my colleagues. For all I know, he could've given them my phone number. His supporters have also been sharing pictures of my friend Jamie McGonnigal, his husband, and his young son which makes me incredibly nervous for them.

I was asked to give you a call tonight but I only have your office number. Please feel free to reach out to me at [redacted].

Thank you,
Monica Rial

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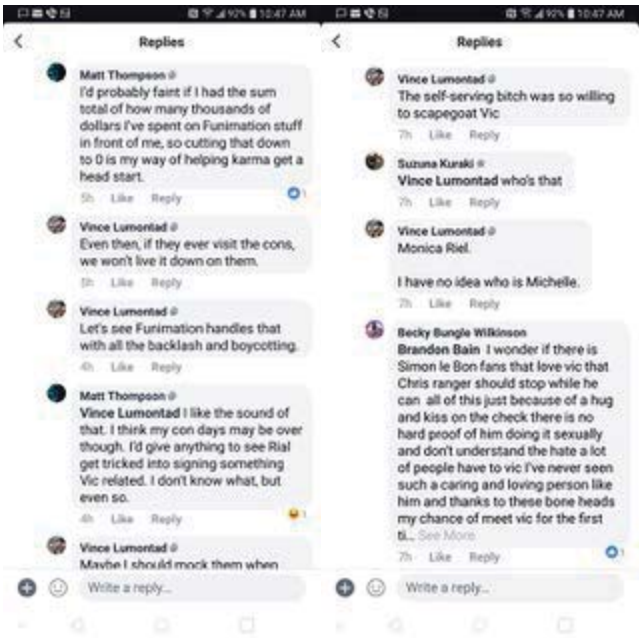

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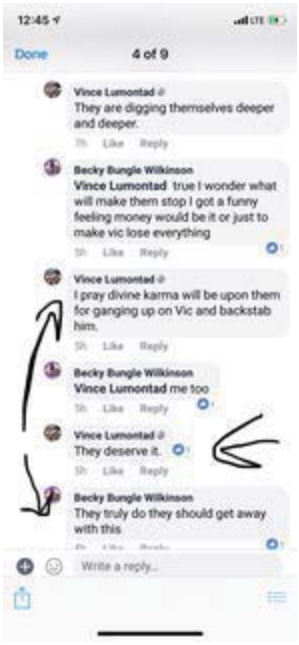

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From: Colleen Carroll <Colleen.Carroll@Funimation.com>
Subject: Security
Date: February 7, 2019 at 5:58:24 PM CST
To: Monica Rial <monicarial@yahoo.com>
Cc: Justin Cook <Justin.Cook@Funimation.com>

Hey, Moni,

Okay. After speaking with Sony security, here is what Karen was told to pass on to you:

1.) call the local police and make a police report.
2.) please email Trina Simon at Trina.simon@funimation.com and recount as much detail as you are able, to describe the phone call. She will pass this along to Sony Security who will most likely give you a call to follow up. You need to use the following subject line: **ATTORNEY CLIENT PRIVILEGE**
3.) Please give Trina Simon a call at [redacted]. She will be able to walk you through everything and she may have some additional questions for clarity. This is her office number. If she is gone for the night, you might ask if she wants you to call on her cell and tell her you need that number.

Sony's further suggestion is to cease all social media engagement for the time being.

And, of course, you can always call me at any time for any reason.

C

Colleen Carroll
Managing Producer - Special Projects
972-537-0993 Ext 4993
Colleen.Carroll@Funima ion.com

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From: Monica Rial <monicarial@yahoo.com>
Subject: Fwd: Dear Monica
Date: February 8, 2019 at 12:13:50 PM CST
To: Colleen.Carroll@Funimation.com

This is what he always does. He's trying to use his charm to get out of this. He knows what he did. It's disgusting. AND he was told by Sony NOT to contact me.

Thank you,
~ Monica Rial ~

Begin forwarded message:

> **From:** <victhewop@aol.com>
> **Date:** February 8, 2019 at 11:58:38 AM CST
> **To:** monicarial@yahoo.com
> **Subject: Dear Monica**
>
> Dear Monica,
>
> I understand that I have hurt you deeply, and I am writing to humbly ask your forgiveness. I have been racking my brain trying to figure out what I did that would make you so angry with me, and I am embarrassed to say that I honestly don't know. I hope you will share what it is with me so that I may sincerely apologize. I have had to step away from social media for sanity's sake. A friend alerted me to your recent tweets.
>
> You have always been one of my most cherished friends in the industry. The thought that I have caused you pain is unconscionable. I am learning that I have not been good at discerning how I come across to others and I am working on being better and doing better with the help of a counselor. I have been crushed under the weight of the events of the past 3 weeks and am fully committed to changing the things about me that need to change.
>
> I sincerely hope you will find it in your heart to share with me what you're thinking and feeling. Regardless, please know that all the years we have been friends, all of the events, projects and meaningful conversations we have shared are treasured ones, and I am gutted at the thought that I ruined something I valued so very much.
>
> Vic

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From: Monica Rial <monicarial@yahoo.com>
Subject: This was sent today.
Date: February 10, 2019 at 12:17:01 PM CST
To: Trina.simon@funimation.com
Cc: Colleen.Carroll@Funimation.com, Lisa Gibson <lisa.gibson@funimation.com>

Hi ladies,

Jamie received this DM from a fan base who still has access to the Risembool Ranger's Discord. She's going to screenshot anything threatening she finds and send it Jamie's way.

Just wanted to let you know.

Thank you,
~ Monica Rial ~

Copy from re:SearchTX

From: Lisa Gibson <Lisa.Gibson@funimation.com>
Subject: Re: Concerned for my safety
Date: February 10, 2019 at 9:27:27 AM CST
To: Monica Rial <monicarial@yahoo.com>, Trina Simon <Trina.Simon@funimation.com>, Geetanjali Dhillon <Geetanjali.Dhillon@funimation.com>, Karen Mika <Karen.Mika@funimation.com>, Marshall Wright <Marshall.Wright@funimation.com>
Cc: Colleen Carroll <Colleen.Carroll@Funimation.com>

+ Geetanjali, Karen, and Marshall

Lisa Gibson
VP of Brand Marketing
972-537-0912 Ext 4912
Lisa.Gibson@funimation.com

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---

From: Monica Rial <monicarial@yahoo.com>
Date: Sunday, February 10, 2019 at 9:01 AM
To: Trina Simon <Trina.Simon@funimation.com>
Cc: Colleen Carroll <Colleen.Carroll@Funimation.com>, Lisa Gibson <Lisa.Gibson@funimation.com>
Subject: Concerned for my safety

Hello Trina,

The online threats made against me have not stopped. And now, Mignogna has gotten on Twitter to make another statement which only fuels the fire. I'm still receiving calls in the middle of the night (thank goodness for 'Do Not Disturb') and I'm now having people accusing me, Jamie Marchi, Neil Kaplan, and anyone who has spoken up of sexual assault. Of course, none of it is true and I'd be happy to talk to Sony about it. I'm so scared I can't even sit in front of an open window in my own home. I'm suffering from serious anxiety, I can't sleep or eat. I don't know how much longer I can take this. I should've handled this differently but I can't change that now. I don't know what to do. I need help. Please.

Thank you,
~ Monica Rial ~

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From: "Denbow, Tammi" <Tammi_Denbow@spe.sony.com>
Subject: RE: Confidential Discussion
Date: February 20, 2019 at 5:33:46 PM CST
To: Monica Rial <monicarial@yahoo.com>

Hi, Monica.

You're welcome! Thanks for the additional info. I will add it to my file.

Thanks,

Tammi

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, February 20, 2019 3:32 PM
To: Denbow, Tammi <Tammi_Denbow@spe.sony.com>
Subject: Re: Confidential Discussion

Thanks again, Tammy.

I looked back at my calendar and while I did attend Acen May 19-22, 2016, my fiancé was there with me and he never left my side. So I actually had 2 folks and the con chair hanging around me all weekend.

Thank you,
~ Monica Rial ~

On Feb 20, 2019, at 4:38 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:

> O.k.
>
> ---
>
> **From:** Monica Rial <monicarial@yahoo.com>
> **Sent:** Wednesday, February 20, 2019 2:30 PM
> **To:** Denbow, Tammi <Tammi_Denbow@spe.sony.com>
> **Subject:** Re: Confidential Discussion
>
> I'm home now. :)
>
> I'll give you a call at 3pm P.
>
> Thank you,

Copy from re:SearchTX

~ Monica Rial ~

On Feb 20, 2019, at 4:24 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:

> Hi Monica.
>
> I'm on my way back from a meeting, but 3 should work, as long as you're not driving. For safety reasons, I don't conduct business conversations when either party is behind the wheel.
>
> Thanks,
>
> Tammi

From: Monica Rial <monicarial@yahoo.com>
Sent: Wednesday, February 20, 2019 2:12 PM
To: Denbow, Tammi
Subject: Re: Confidential Discussion

Hi Tammi,

I just left the studio so I can give you a call at 3pm if that works.

Thank you,
~ Monica Rial ~

On Feb 20, 2019, at 2:46 PM, Denbow, Tammi <Tammi_Denbow@spe.sony.com> wrote:

> Hi, Monica.
>
> I need to speak to you regarding a new matter brought to my attention. I'm providing my current availability in Pacific time zone, but it is subject to change. We shouldn't need more than 30 minutes, but it's best if we schedule a time when we are both assured of privacy on our respective ends of the call. Please respond with a time when you will be available (keeping in mind the time difference) and I'll confirm.
>
> Today 2/20 3-5:30 p.m. Pacific

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Thu 2/21 8:30 a.m. – 5 p.m. Pacific
Fri 2/22 9:30 a.m. – 6 p.m. Pacific

I can also be available outside of our normal business hours with 24 hours' advance notice. I look forward to speaking with you soon,

Tammi

Tammi Denbow
Executive Director, P&O
Sony Pictures Entertainment
10202 West Washington Blvd.
Culver City, CA 90232
(310) 244-2907
Tammi_Denbow@spe.sony.com

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From: "Denbow, Tammi" <Tammi_Denbow@spe.sony.com>
Subject: Re: Concern about Vic and leaked information
Date: April 17, 2019 at 4:09:59 PM CDT
To: Monica Rial <monicarial@yahoo.com>

Hi, Monica. I'm doing well, thanks.

Thank you for bringing this to our attention. We have not disclosed information about the investigation, and are unaware of how this individual might have obtained any information.

Tammi

From: Monica Rial <monicarial@yahoo.com>
Sent: Tuesday, April 16, 2019 7:00 PM
To: Denbow, Tammi
Subject: Concern about Vic and leaked information

Hello Tammi,

I hope you're doing well. I'm so sorry to bother you but something has come up that concerns me. I don't know if you've been following the circus online, but there is a YouTube lawyer in Minnesota who has gained quite a following by talking about the Vic situation. I was thoroughly confused when I checked my Twitter this morning and people were tweeting me pictures of jelly beans. As it turns out, this YouTube lawyer somehow knew the story that I shared with you in the investigation. I haven't shared that with anyone so I'm concerned there may be a leak at Funimation or perhaps Vic is giving him this information. Just so you recall, many years ago at a convention someone handed Vic a jelly bean (or some candy), he asked me to sign it, which I did, and he then ate it and said "Now I can tell everyone I ate Monica Rial." This YouTube lawyer, Nick Rekeita, shared this story and told his viewers that was why he was let go from Funimation. I normally don't care what this man has to say, but it really concerned me and I thought you should know.

Thank you,
~ Monica Rial ~

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Exhibit B

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Funimation ⚔️ @FUNimation · Feb 11
Everyone, we wanted to give you an update on the Vic Mignogna situation. Following an investigation, Funimation recast Vic Mignogna in Morose Mononokean Season 2. Funimation will not be engaging Mignogna in future productions.
3K 6.7K 20K

Alexander Lawliet
@Drifted_Spice

Replying to @FUNimation

Why is it that when @Rialisms cries wolf (with no evidence, mind you) that everyone automatically assumes the worst. She has known this man for 20 years, and only "comes forward" now that he's getting attention. I would like an actual answer, if you could supply one.

5:26 PM · Feb 11, 2019 · Twitter for Android

32 Retweets **394** Likes

Monica Rial @Rialisms · Feb 11
Replying to @Drifted_Spice and @FUNimation
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
50 1 66

Scasher96 @Scasher961 · Feb 13
Replying to @Drifted_Spice @FUNimation and @Rialisms
Wtf

2 2 11

1 more reply

This Tweet is unavailable

This Tweet is unavailable

Tweets are not Real Life: Dragon Con 2019 @Spacebird77 · Feb 17
Replying to @Drifted_Spice @FUNimation and @Rialisms
You know something? Multiple respected companies with well trained Lawyers have looked over evidence that WE DO NOT GET TO SEE because LAWSUITS and made choices. I have enjoyed both Vic and Monica's work, I don't WANT Vic to be Guilty but Facts are inconvenient like that.

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Relevant people

Alexander Lawliet
@Drifted_Spice
I'm a 14 year old grar

Funimation ⚔️
@FUNimation
Celebrate 25 years to anime, forever. Share using #funiversary

Monica Rial
@Rialisms
Keeping child actors the 90's... For convent email info@primetim #Bulma #Froppy #Mi #genLOCK

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Trending with: #FunimationE

Anime
An audio leak puts Funimat in the hot seat

Meghan Trainor
Trending with: Megan Traino

Simone Biles
19K Tweets

US news
Fans are sending Simone B love after news of her broth

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Trending with: Johnny Depp,

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TheQounaistado @GadielDiaz5 · Feb 14
Replying to @Drifted_Spice @FUNimation and @Rialisms
I mean his behavior has been somewhat related to this for the past decade and so I guess this was the last straw but I mean I can see your point in your perspective

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3K 6.7K 20K

Big Boss
@Gray_Fox25

Replying to @FUNimation

So false allegations,slandering,and wrongful termination and no evidence wow you guys are something else #istandwithvic #KickMonica #boycottfunimation

4:34 PM · Feb 11, 2019 · Twitter for Android

21 Retweets **57** Likes

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Relevant people

Big Boss
@Gray_Fox25
I'm a gamer and love player. Metal Gear is a game I Have a PS3 an is tommyfyi and i stre

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@FUNimation
Celebrate 25 years to anime, forever. Share using #funiversary

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CleverFOXSOL @CleverFOXSOL · Feb 11
If Vic was fired then Monica should he as well. Since both are a cause of problems. Harassing fans. Both sides should be recasted. This way it's fair. Untill investigation is done. Seriously
39 105 2K

Monica Rial @Rialisms · Feb 11
There were multiple investigations with testimony, proof, evidence. Companies don't cut ties without those things. However, that information is classified. I am one of dozens of men and women who participated. Stop harassing me.
248 79 1.5K

Will
@WillamWebb

Replying to @Rialisms @CleverFOXSOL and @FUNimation

If you knew he was like this, you covered it up... youre just as bad

8:19 PM · Feb 11, 2019 · Twitter for iPhone

46 Retweets **1.7K** Likes

Monica Rial @Rialisms · Feb 11
Replying to @WillamWebb @CleverFOXSOL and @FUNimation
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
498 25 836

Ryan Witwicki Faddegon @IEatsoulsbuddy · Mar 14
Replying to @WillamWebb @Rialisms and 2 others
Honestly get a clue. That's not how sexual assaulted behavior works. Experience sexual assault first or know someone who has then come back.

This Tweet is unavailable

Search Twitter

Relevant people

Will
@WillamWebb
#

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 +
at: twitch.tv/cleverfox
youtube.com/c/clever

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3K 6.7K 20K

Shan Ryder @anne_author · Feb 12
So... Who wants to boycott Funimation until they show proof?
3 2 43

Jamie Charles Ellis
@JamieCharlesEl1

Replying to @anne_author and @FUNimation

Show proof? You are joking, right? They have no legal obligation to disclose any kind of evidence with regards to this investigation and you guys would accuse them of trying to further smear his name by releasing hard evidence of it. Just accept he's a creep and move on.

11:04 AM · Feb 12, 2019 · Twitter Web Client

8 Likes

More replies

Mr.Grey @Greytothebone · Feb 12
Replying to @JamieCharlesEl1 @anne_author and @FUNimation
Who's the creep again? #MonicaRial #Istandwithvic #Kickvic #Seanschemmel #ChrisSabot #Youshouldbewatching #stoplyingaboutvic #SonnyStrait #KaraEdwards

5 9

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Relevant people

Jamie Charles Ellis
@JamieCharlesEl1
I'm weird, i'm gothic, i'm a huge DnD fan a kinda funny. Follow m hear some jokes, I gu

Shan Ryder
@anne_author
I'm just an author wit

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@FUNimation
Celebrate 25 years to anime, forever. Share using #funiversary

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39 105 2K

Monica Rial @Rialisms · Feb 11
There were multiple investigations with testimony, proof, evidence. Companies don't cut ties without those things. However, that information is classified. I am one of dozens of men and women who participated. Stop harassing me.
248 79 1.5K

Mrcleans_crispyBunns
@cleancrispybuns

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Call it harassment if you want I don't really care🤦 but your actions just don't line up with your claims and this is from an objective standpoint. Also you're quick to burn @vicmignogna but what about the claims against @marchimark by @GhostShellZen. Will you stand with them?

3:12 PM · Feb 13, 2019 · Twitter Web App

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Relevant people

Mrcleans_crispyBunn
@cleancrispybuns
My buns are crispy ar clean!

Monica Rial
@Rialisms
Keeping child actors the 90's... For convent email info@primetim #Bulma #Froppy #Mi #genLOCK

CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 + at: twitch.tv/cleverfox youtube.com/c/clever

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248 79 1.5K

Captain_Vibrant
@Vibrant_Weeb

Replying to @Rialisms @CleverFOXSOL and @FUNimation

All false testements, sure vic is an over friendly guy, but you all just join in for thr killing blow to make more trouble for vic

7:19 PM · Feb 13, 2019 · Twitter for Android

2 Likes

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Captain_Vibrant
@Vibrant_Weeb

Monica Rial
@Rialisms
Keeping child actors
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248 79 1.5K

Daelan
@TezPrime

Replying to @Rialisms @CleverFOXSOL and @FUNimation

That's freedom of speech lady not harassment. In all honesty, you should be held accountable as well for causing such events. Doesn't make what Vic may have potentially done right but it also doesn't make your actions better when there's proof of you telling others to harass him.

1:02 AM · Feb 14, 2019 · Twitter for iPhone

14 Likes

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Daelan
@TezPrime
Tez or Tezzy either on

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@Rialisms
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the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
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248 79 1.5K

james greear
@jamie3738

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Multiple investigations huh? Well he's not being charged with a crime and right now it's ur word against his why should I believe u after what happened to Chris Hardwick.

2:07 AM · Feb 14, 2019 · Twitter for iPhone

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james greear
@jamie3738

Monica Rial
@Rialisms
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CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 +
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#FeelGoodFriday
2,777 Tweets

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Kai Sörensen
@Tallon_1

Replying to @Rialisms @CleverFOXSOL and @FUNimation

There are 2 reasons to have it classified.
1 falls away since slander and libel only work in court if you are spreading a lie,as theres proof it apparently happend, there is no need to hide it out of that reason.

The other would be that it had a nasty/er side for the opposition

6:20 PM · Feb 14, 2019 · Twitter Web Client

Relevant people

Kai Sörensen
@Tallon_1
Chuchichäschtli

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 +
at: twitch.tv/cleverfox
youtube.com/c/clever

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Trending with: #FunimationE

Anime

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Funimation ⚔️ @FUNimation · Feb 11
Everyone, we wanted to give you an update on the Vic Mignogna situation. Following an investigation, Funimation recast Vic Mignogna in Morose Mononokean Season 2. Funimation will not be engaging Mignogna in future productions.
3K 6.7K 20K

CleverFOXSOL @CleverFOXSOL · Feb 11
If Vic was fired then Monica should he as well. Since both are a cause of problems. Harassing fans. Both sides should be recasted. This way it's fair. Untill investigation is done. Seriously
39 105 2K

Monica Rial @Rialisms · Feb 11
There were multiple investigations with testimony, proof, evidence. Companies don't cut ties without those things. However, that information is classified. I am one of dozens of men and women who participated. Stop harassing me.
248 79 1.5K

Micah C. Welch 🐻
@Micahlmighty

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Monica The fact that you can throw out harassment so loosely as to claim a tweet is a form of harassment makes me question if you truly were ever harassed in the first place. A man lost his job due to your claim yet your making the same claim from a tweet...

1:19 AM · Feb 14, 2019 · Twitter for iPhone

7 Likes

Matt614 @Matt6142 · Aug 4
Replying to @Micahlmighty @Rialisms and 2 others
She's selfish and you can tell just what type of person she is, she's a cunt plain and simple.

Search Twitter

Relevant people

Micah C. Welch 🐻
@Micahlmighty
They call me Coach |

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 +
at: twitch.tv/cleverfox
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Trending with: Megan Traino

Simone Biles
18.9K Tweets

US news
Fans are sending Simone B
love after news of her broth

Dior
Trending with: Johnny Depp,

US news
Dior accused of cultural

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248 79 1.5K

S[paz]Ty
@INk_WolfNN

Replying to @Rialisms @CleverFOXSOL and @FUNimation

people like this person arent harassing you, you ignorant loud mouth, you need to just learn when to keep your mouth shut. not everything needs to be on social media. and if you really are the "victim" you wouldn't to answer every damn negative thing people say

1:33 AM · Feb 14, 2019 · Twitter Web Client

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Relevant people

S[paz]Ty
@INk_WolfNN
Love, Art, Anime and

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

CleverFOXSOL
@CleverFOXSOL
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Dior
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appropriation for 'Sauvage'

#FeelGoodFriday

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248 79 1.5K

scott grass
@scottgrass1

Replying to @Rialisms @CleverFOXSOL and @FUNimation

you lied your ass off...no real proof only bullshit

8:17 PM · Feb 14, 2019 · Twitter Web Client

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scott grass
@scottgrass1

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim

#Bulma #Froppy #Mi
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@CleverFOXSOL
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248 79 1.5K

Seth
@PhaseShiftTV

Replying to @Rialisms @CleverFOXSOL and @FUNimation

You're literally the reason why people doubt people who speak up about sexual assault

4:19 AM · Feb 14, 2019 · Twitter for iPhone

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Seth
@PhaseShiftTV
EMT, Firefighter, self-tier fiora main

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
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248 79 1.5K

Xavier
@XavierV87287309

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Where is the fucking evidence

12:39 PM · Feb 15, 2019 · Twitter for iPhone

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Xavier
@XavierV87287309
Aspiring Voice Actor/
Game Fanatic/ Meme

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

CleverFOXSOL
@CleverFOXSOL
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Jerry Jones
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Shane Ray
1,116 Tweets

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39 105 2K

Monica Rial @Rialisms · Feb 11
There were multiple investigations with testimony, proof, evidence. Companies don't cut ties without those things. However, that information is classified. I am one of dozens of men and women who participated. Stop harassing me.
248 79 1.5K

Kevin
@kevinthedrinker

Replying to @Rialisms @CleverFOXSOL and @FUNimation

There is no proof, no evidence, and most certainly no testimonies. You yourself state you won't go to the cops.

6:44 PM · Feb 16, 2019 · Twitter Web Client

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Relevant people

Kevin
@kevinthedrinker
Minds: KevinMckool - kevinmckool

Monica Rial
@Rialisms
Keeping child actors c the 90's... For convent email info@primetim #Bulma #Froppy #Mi #genLOCK

CleverFOXSOL
@CleverFOXSOL
Guilty Gear -REV-2 + at: twitch.tv/cleverfox youtube.com/c/clever

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Trending with: #FunimationE

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Simone Biles
18.7K Tweets

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Dior
Trending with: Johnny Depp,

US news
Dior accused of cultural appropriation for 'Sauvage'

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248 79 1.5K

Law of Clonoth 一方通行
@AeonAccelerator

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Companies can cut ties for any reason whatsoever, so that's already false. They fired Vic to save face here to just relieve the pressure from them to retain the peace within the community. And that's not harassment considering it's straight up facts and no slandering involved.

3:01 AM · Feb 16, 2019 · Twitter for Android

1 Like

FiNiSH Random @itherealrandom · Mar 11
Replying to @AeonAccelerator @Rialisms and 2 others
No, there are actual laws preventing companies from firing employees without just cause. Vic worked there for years, so he was protected by that clause. You don't know what you're talking about

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Relevant people

Law of Clonoth 一方
@AeonAccelerator
"It's true I have no re
her, but that's no reas
die."

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
#genLOCK

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@CleverFOXSOL
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3,400 Tweets

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Jerry Jones
5,775 Tweets

Simone Biles
18.4K Tweets

US news

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CleverFOXSOL @CleverFOXSOL · Feb 11
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39 105 2K

Monica Rial @Rialisms · Feb 11
There were multiple investigations with testimony, proof, evidence. Companies don't cut ties without those things. However, that information is classified. I am one of dozens of men and women who participated. Stop harassing me.
248 79 1.5K

omegaheber
@omegaheber

Replying to @Rialisms @CleverFOXSOL and @FUNimation

you havent showed any proof, donkey

1:00 PM · Feb 16, 2019 · Twitter for Android

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omegaheber
@omegaheber

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
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Jerry Jones
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Shane Ray
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Funimation ⚔️ @FUNimation · Feb 11

productions.

3K 6.7K 20K

CleverFOXSOL @CleverFOXSOL · Feb 11

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39 105 2K

Monica Rial @Rialisms · Feb 11

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248 79 1.5K

Tweet

Don Diego
@goofydiego

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Lol you know that's not true. Many companies prematurely fire people because of fake outrage. Thanks for reminding the world why we shouldn't JUST BELIEVE.
You should totally voice the princess bitch from shield hero. It's perfect for you.

11:17 AM · Feb 17, 2019 · Twitter Web App

Relevant people

Don Diego
@goofydiego

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
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Simone Biles
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248 79 1.5K

Kanae Suzuki #IStandWithVic
@kjk2014rules

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Zero proof, so your word means shit. Vic is innocent until proven Guilty. Companies will fire anyone if one person has an issue, regardless of proof. its sickening #FireMonicaRial #IStandWithVic

5:51 PM · Feb 17, 2019 · Twitter Web Client

1 Like

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Kanae Suzuki #IStan
@kjk2014rules
Just a 23 year old wh
anime, and art!

Monica Rial
@Rialisms
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248 79 1.5K

Thomas
@ThomasBlaBa

Replying to @Rialisms @CleverFOXSOL and @FUNimation

Companies would easily drop an employee over allegations if it means avoiding a PR disaster and avoiding the risk of having a proven rapist, or whatever they did, employed. There are past examples of people losing their careers even after being proven innocent.

5:40 AM · Feb 17, 2019 · Twitter Web Client

2 Likes

FiNiSH Random @itherealrandom · Mar 11
Replying to @ThomasBlaBa @Rialisms and 2 others
You clearly don't know how business works at all

Blain20 @Blain20_ · Jul 25
Replying to @ThomasBlaBa @Rialisms and 2 others
And they will pay for it.

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Thomas
@ThomasBlaBa

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
email info@primetim
#Bulma #Froppy #Mi
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CleverFOXSOL
@CleverFOXSOL
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Jerry Jones
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248 79 1.5K

Cory Shwadlenak
@coryshwadlenak

Replying to @Rialisms @CleverFOXSOL and @FUNimation

For some reason, people think that this is easy to talk about.
For the record, you have 100% of my support

2:48 PM · Jun 4, 2019 · Twitter Web App

4 Likes

Monica Rial @Rialisms · Jun 4
Replying to @coryshwadlenak @CleverFOXSOL and @FUNimation
Thank you. ❤️
1

Nick @nsm0220 · Jun 4
Monica I have your back these people just do not know how investigations work you are brave person and I'm sorry this happened to you I'll do anything I can to help you get through these rough times
2

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Cory Shwadlenak
@coryshwadlenak
Blogs about Anime/M
Underground music i
elsewhere.

Monica Rial
@Rialisms
Keeping child actors
the 90's... For convent
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Trending with: Johnny Depp,

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Exhibit C

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CAUSE NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	§	IN THE DISTRICT COURT
v.	§	
	§	141st JUDICIAL DISTRICT
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, AND RONALD TOYE, Defendants	§	TARRANT COUNTY, TEXAS

UNSWORN DECLARATION OF CHRISTOPHER SLATOSCH

On this day, Christopher Slatosch stated as follows:

1. My name is Christopher Slatosch, and I live in Ector County, Texas. I am over the age of eighteen years and competent to make this Declaration. I have personal knowledge of the facts stated in this Declaration, and these facts are true and correct.

2. I and my company, Silvrfire LLC ("Silvrfire") are owners of Kameha Con, an anime convention.

3. The agreement attached as Exhibit A was a binding contract between Silvrfire and Victor Joseph Mignogna ("Vic"), providing for his appearance at Kameha Con on April 12-14, 2019. This agreement was executed in July of 2018.

4. The listed date for Kameha Con is incorrect in the Agreement; it should have been April 12-14, 2019, but both parties understood.

5. Monica Rial ("Rial") was also scheduled to appear at Kameha Con on April 12-14, 2019.

6. From February, 2019 through April 11, 2019, I had several conversations with Ronald Toye ("Toye") and Rial by telephone and numerous text message conversations with Toye. Exhibit B is a true and accurate copy of the text messages exchanged between us.

7. In these conversations, Toye repeatedly asserted that Vic was a sexual predator and that criminal charges would soon be filed against Vic. Toye urged me repeatedly to terminate Vic's appearance. I told him that this would breach the contract with Vic. He urged me to do it anyway, emphasizing that criminal charges would be filed before April 12-14, 2019.

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8. In these conversations, Toye also encouraged me to not do business with Vic in the future.

9. I participated in a telephone conversation with Rial in which she repeatedly asserted that Vic was a sexual predator and that criminal charges would soon be filed against him. She also implied (and I inferred) that she would convince numerous other voice actors to cancel their appearances at Kameha Con. I heard Toye in the background talking to her and she periodically responded in agreement with him.

10. Termination of multiple appearances at the last minute would have severely threatened the profitability of Kameha Con.

11. Her threat turned out to be credible, since a number of the voice actors she claimed to have influence over ultimately did cancel their appearances.

12. Rial and Toye were aware that a contract had been executed between Silvrfire and Vic because I informed both of them of that fact and they repeatedly urged me to have Silvrfire breach the contract.

13. Toye also clearly implied that his company would withdraw a promised sponsorship (worth approximately $25,000) if Silvrfire did not breach its contract with Vic. The sponsorship ultimately did not materialize.

14. Silvrfire did breach its contract with Vic by cancelling his appearance. After being threatened with litigation from Vic's counsel, and after long negotiations and legal expenses, Silvrfire agreed that Vic could attend Kameha Con under numerous restrictions that were not part of the original agreement and that were not imposed on other guests, including Vic paying for additional security, not participating in panel discussions, signing in a different location from the other guests, etc.

15. As a result of this compromise, a number of the voice actors Rial mentioned cancelled their appearances.

16. In summary, Rial and Toye individually and jointly, told me that Vic was a sexual predator who would be criminally charged before Kameha Con and they urged me to breach the contract with Vic. They threatened to lead a boycott of Kameha Con and they threatened to withdraw significant sponsorship money that had been promised unless Silvrfire breached its contract with Vic. Finally, they urged me to never do business with Vic in the future.

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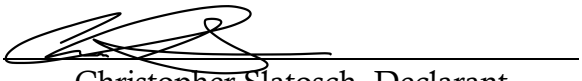

Christopher Slatosch, Declarant

Jurat
(Sensitive Information Redacted Per T.R.C.P. 21)

My name is Christopher Slatosch, my date of birth is xx/xx/xxxx, and my address is xxxx xx xxxx xxx, xxxxxx, xxxxx, xxxxx and USA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Ector County, State of Texas, on the 2nd day of September, 2019.

Christopher Slatosch

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Slatosch Declaration

Exhibit A

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SILVRFIRE LLC | ODESSA,TX 79762 | 432-653-6511 | CHRIS@SILVRFIRE.COM

Confidential Contract between "SILVRFIRE LLC" and "Guest" for
Personal and/or Autograph Appearance (Hereafter referred to as the"Agreement")

I. General

This document and all identified and attached Appendices constitute an agreement between Guest and SilvrFire LLC.

Guest Information :

- **Full Legal Name:** Vic Mignogna
- **DOB:** 08/27/62
- **Email:** victhewop@aol.com
- **Airline AA#, SkyMiles#, Rapid Rewards#:** 340YNL8
- **TSA#:** n/a
- **Departing Airport:** LAX
- **Signature Price:** 30
- **Table Side Photo Op Price:** 20

1.1 This Agreement shall be governed by the laws of the state of Texas. In the event of any conflict, inconsistency, or incongruity between the provisions of any attached Appendices, the provisions of this Agreement shall govern and control.

1.2 Silvrfire, by virtue of this Agreement, agrees to conduct the:

- **Event:** Kameha Con
- **Dates:** April 12th-14th 2018
- **Venue:** Irving Convention Center-500 West Las Colinas Boulevard
- **City, State:** Irving, TX 75039

1.3 Vic Mignogna _____will be the Guest's representative and agent for purposes of facilitating this Agreement in all respects.

1.4 It is understood that this Agreement is binding on both parties. It cannot be altered or changed unless agreed to, in writing, by SilvrFire and Guest and/or SilvrFire LLC and Agent. No oral representation, warranty, condition, or agreement of any kind or nature whatsoever shall be binding unless specifically incorporated into this Agreement.

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1.5 Silvrfire will not announce Guest until this agreement is fully executed unless otherwise agreed upon in writing by SilvrFire and Guest/Representative.

II. Financial and Related Arrangements by Promoter

SilvrFire agrees to provide Guest with the following:

2.1 $6,500.00 US Dollars (hereafter referred to as the "Guarantee") will be paid to Guest:

2.1 (a) The Guarantee represents a draw against autograph, merchandise, photo opportunity and Meet & Greet sales made at the Event during autograph sessions at the signing table (such sales hereafter referred to as the "Proceeds") at Silvrfire's Event;

2.1 (b) Silvrfire guarantees Guest the total amount of the Guarantee whether or not the Proceeds actually reach such amount;

2.1 (c) Should Guest's proceeds not reach the amount of sales necessary to equal or surpass the Guarantee, Silvrfire will purchase autographs the difference in such amount needed to bring the total amount of proceeds to the guarantee.

2.1 (d) Guest will retain 100% of all Proceeds collected during Event and at the end of each day the Agent/assigned SilvrFire Handler will report the total amount of proceeds collected during the Event to Silvrfire Staff after a tally of the daily sales has been completed

II. (A) Photo-Ops

2.2 If SilvrFire and Guest agree in writing, SilvrFire may offer professional photo opportunities with Guest for $50 for each photo taken.

2.2 (a) Of the for each photo taken, Guest will receive $25 and Photographer and SilvrFire will divide the remaining however they may agree; Guest amount will count toward guarantee, when guarantee is applicable.

2.2 (b) Photographer will supply 8" x 10" photographs.

II. (B) Meet & Greets

2.2 (c) Guest agrees to participate in at least (1) one Meet & Greet during scheduled hours of appearance. Guest will receive combo price of autograph and signature. The remaining will be spit between promoter, artist and signature verification company.

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2.2 (d) Meet & Greets will be presold and guest will receive Meet & Greet purchases upon arrival to the event.

2.2 (e) Meet & Greet amount paid out to guest will count toward guarantee is applicable.

2.2 (d) If Meet & Greet is scheduled, it will be cleared with Guest upon signing. Schedule will be set at least 30 days before the event and included in guest itinerary.

II. (C) Travel/Lodging/Misc. Arrangements

2.3 Promoter will provide one Economy Airfare for Guest: (1) Economy round-trip airfare when available from for Guest. Guest must approve all flight arrangements in advance of Promoter's purchase. Please note the following:

2.3 (a) Confirmed flight itineraries and/or tickets for Guest must be received by SilvrFire no later than 30 days prior to the first day of the Event;

2.3 (b) If SilvrFire does not receive confirmed flight itineraries and/or tickets for Guest no later than 30 days prior to the first day of the Event, Guest may consider this contract null and void.

2.3 (c) SilvrFire will provide transportation or hotel shuttle service for Guest. This transportation will be scheduled for airport/hotel/venue throughout the length of the event.

2.3 (d) SilvrFire will provide 1 hotel room for Guest. Hotel room will be at least a three star rating or higher.

2.3(e) SilvrFire will only cover room charges and taxes. All incidental charges (ex. phone calls, room service, pay per view) are the guest's responsibility. Guest will be required to place card on file for incidentals upon arrival.

2.3 (f) Promoter will provide Guest with $60 US Dollars per diem for three (3) days, for a total of $180 payable in cash immediately upon Guest's arrival at Event city. Access to Event Green Room will also be provided to Guest and guest only. Handlers, agents or representatives will not be allowed to access guest green room.

III. Guest's Responsibility

The Guest is responsible to provide the following:

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3.1 Guest will attend the SilvrFire's Event as a guest. Guest will appear at selected times throughout the Event but no earlier than 10 AM and no later than 7 PM unless otherwise agreed to in writing by Guest and/or SilvrFire.

3.2 Guest will attend at least one discussion session for no more than 60 minutes each day, over the 3 day event (said day, time, title of panel/Q&A/discussion and other panelist to be agreed upon in writing by Guest and/or Agent prior to printing of the Event program or internet/website publication) unless otherwise agreed upon in writing by Guest and/or Agent;

3.3 Subject to Guest's written approval and availability, Guest will participate in a maximum of 2 pre-arranged media and promotional activities for Event to be arranged by Promoter and approved by Guest before Guest arrival.

3.4 Guest agrees not to appear at another event within 50 miles of SilvrFire's event within 60 days before or after the Event date.

3.5 Guest will use their best efforts to promote their appearance through social media and other viable means available to the guest.

3.6 Guest will provide all photos and merchandise for all autograph sessions.

3.7 Guest will provide 30 signed photos for SilvrFire.

IV. Cancellation

It is agreed that both parties are to make their "best efforts" in order to attend and/or present at the Event as scheduled. In addition:

4.2 Once Guest has been advertised or promoted, in any way, to appear at Event, neither SilvrFire nor Guest may change the parameters of this Agreement or cancel Guest's appearance for any reason other than as outlined in section 4.3 & 4.4; however neither party shall be in breach of this Agreement if here is any total or partial failure of performance by it of its duties and obligations under this Agreement occasioned by any act of God, fire, act of government or state, criminal act of any third party, war, civil commotion, insurrection, act of terrorism, embargo, labor disputes of whatever nature, adverse weather conditions, event cancelation and any other reason beyond the control of either party. If either party is unable to perform its duties and obligations under this Contract as a direct result of the effect of one of those reasons, that party shall give written notice to the other of the inability which sets out full details of the reasons therefore. Providing substantial proof of reason.

4.3 Guest shall not be liable for failure to appear, present, or perform, if such failure is caused by or due to the disability or illness or accident of Guest or Guest's immediate family member, or for any total or partial failure of performance by Guest of Guest's duties and obligations under this Agreement occasioned by any act of God, fire, act of government or state, criminal act of any third party, war, civil commotion,

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insurrection, act of terrorism, embargo, labor disputes of whatever nature, adverse weather conditions, and any other reason beyond the control of either party. If either party is unable to perform its duties and obligations under this Contract as a direct result of the effect of one of those reasons, that party shall give written notice to the other of the inability which sets out full details of the reasons therefore. Once notification of Guest's cancellation is given to SilvrFire, SilvrFire will immediately cease all advertising and promotion of Guest's appearance. An announcement of Guest's cancellation must be placed in any and all of Guests and SilvrFire's websites promoting appearance within 24 hours of notification. Any advertising or promoting of Guest's appearance will be removed from SilvrFire's Event website within 24 hours of notification of cancellation of Guest's appearance. In addition to the reasons for Guest's cancellation described herein, Guest may also cancel appearance if required to be in attendance for film and/or television work or other professional obligations of work that may fall outside the entertainment industry. Guest will provide detailed description of how it interferes with appearance.

4.4 Guest may not cancel appearance at Event to attend another autograph appearance unless Guest is contractually obligated to a studio for an upcoming film or television appearance.

V. Miscellaneous

Please note the following miscellaneous provisions of this Agreement:

5.2 The failure or forbearance by either party on any occasion to insist upon the full performance of the terms, conditions and provisions of the Agreement shall not thereby constitute a waiver of such breach or an acceptance of any variation of the Agreement.

5.3 This executed Agreement supersedes all prior agreements, written or oral, between SilvrFire and Guest and shall constitute the entire Agreement and understanding between the parties with respect to the subject matter hereof. The Agreement and each of its provisions shall be binding upon the parties and may not be waived, modified, amended or altered except by a writing signed by Guest and SilvrFire.

5.4 No permission is given for the disclosure of any term or provision of this Agreement to any third party. If made known that this provision has been breached, SilvrFire LLC reserves the right to nullify this contract in its entirety.

5.5 Agent and Guest agree that, unless otherwise provided by mutual agreement in writing, all communications by, among or between SilvrFire, Guest and Agent concerning the Event, arrangements for the Event, this Agreement (including any Appendices hereto), and/or any of the terms of this Agreement are confidential and shall not be disclosed, shared, or communicated to any person or entity other than SilvrFire, Guest or Agent.

VI. Signatures

Once this Agreement has been signed by a SilvrFire LLC Representative, the Guest has seven (7) business days to sign and return the fully executed agreement or this agreement may be considered null & void. By signing this Agreement, I confirm that I have read and agree to all terms and conditions stated above:

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"SilvrFire Representative":

DocuSigned by:
656F846AC5684AD...

Date: 7/8/2018 8:49:23 AM PDT

By signing this Agreement, I confirm that I have read and agree to all terms and conditions stated above:

"GUEST":

DocuSigned by:
Vic Mignogna
F698E56530A546F...

Date: 7/7/2018 11:03:06 AM PDT

Slatosch Declaration

Exhibit B

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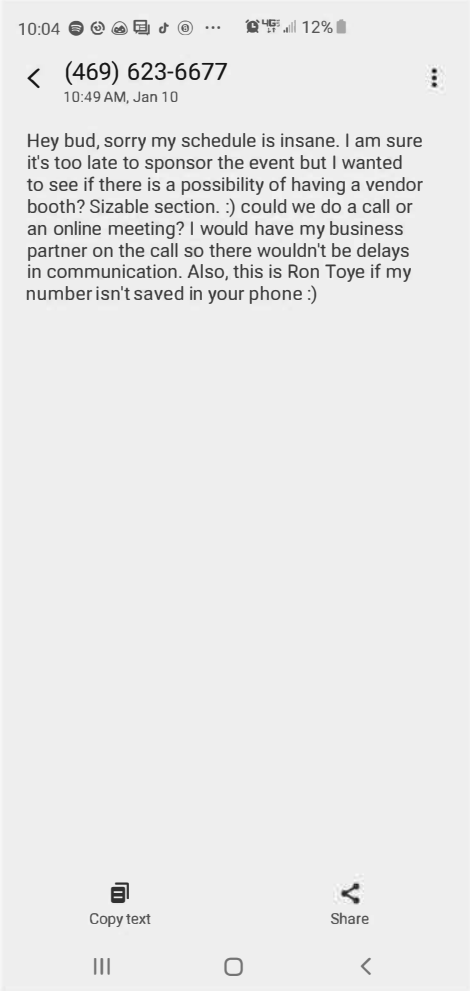

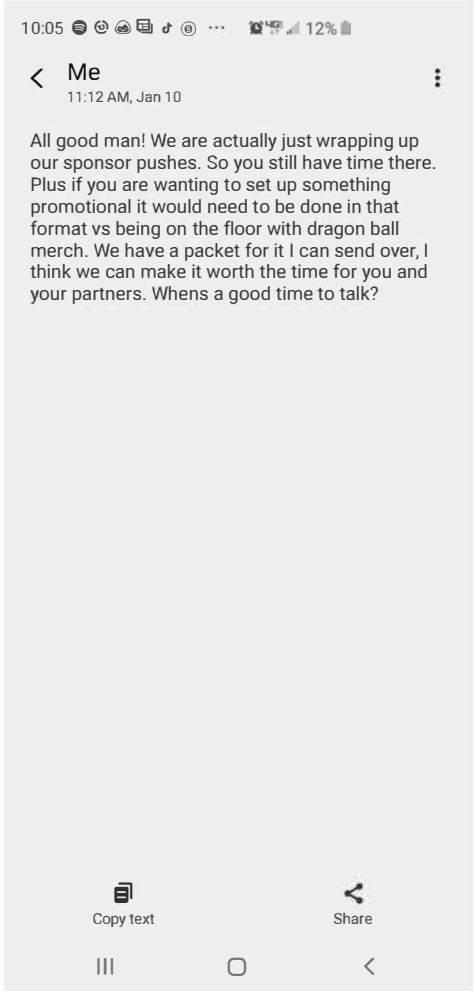

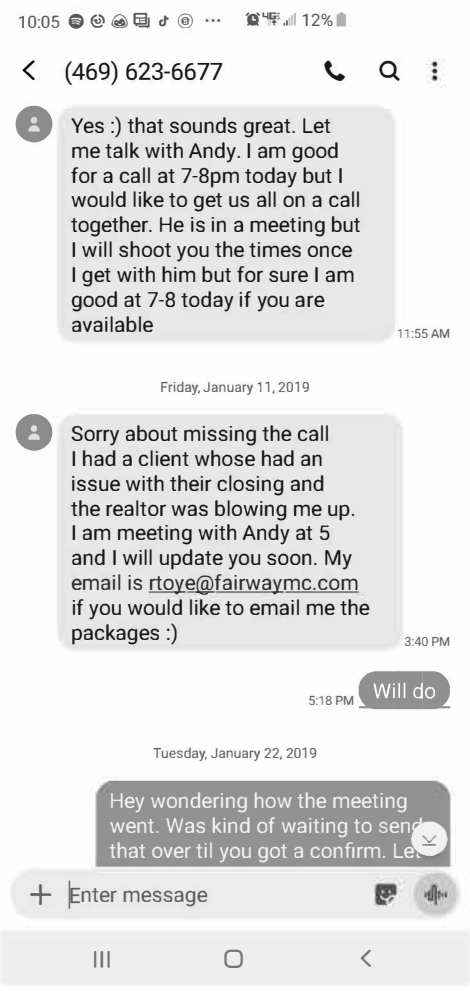

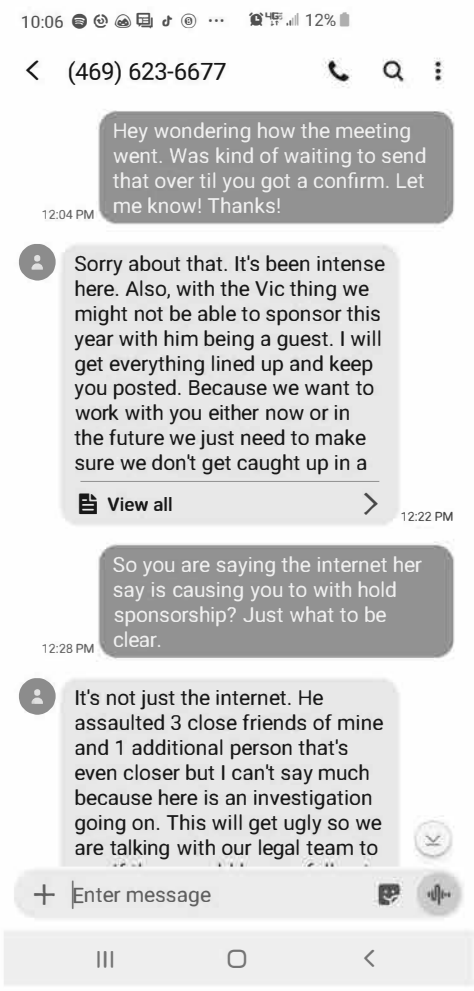

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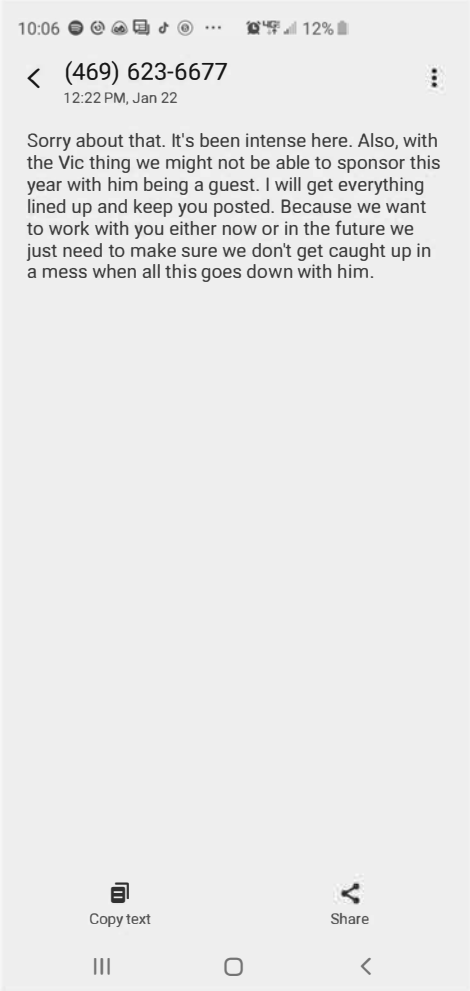

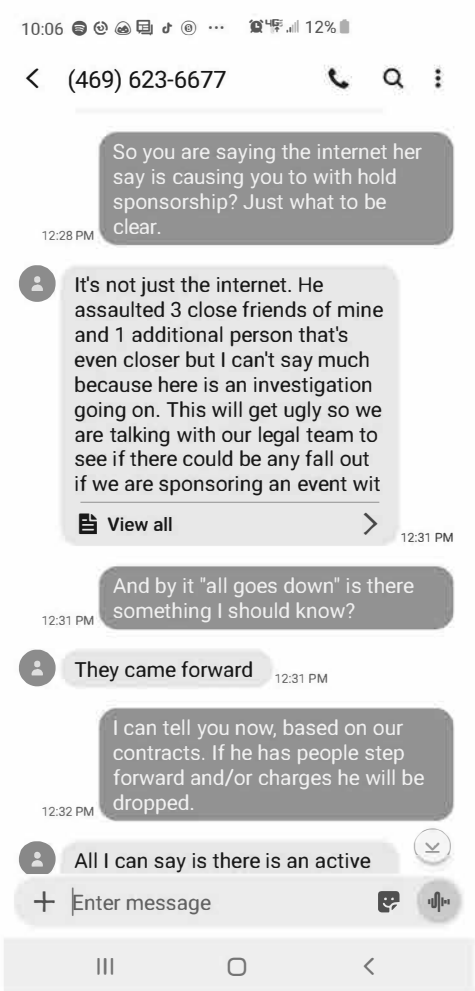

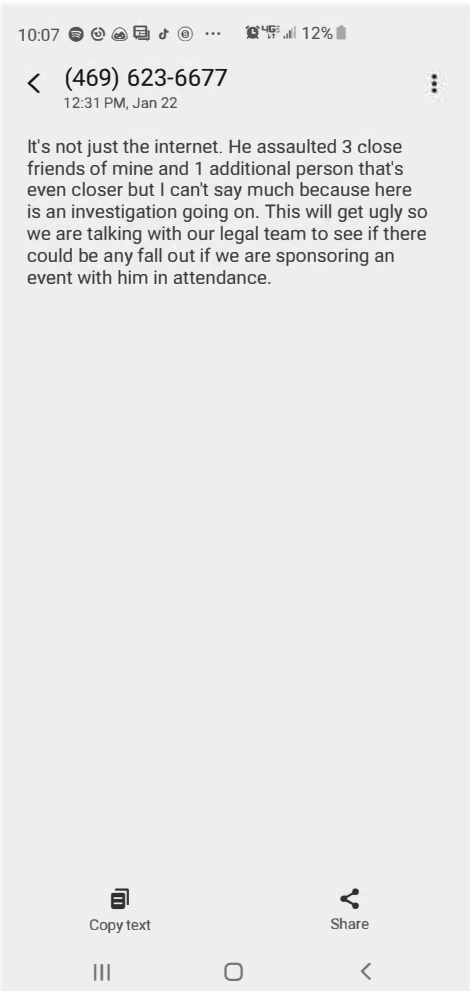

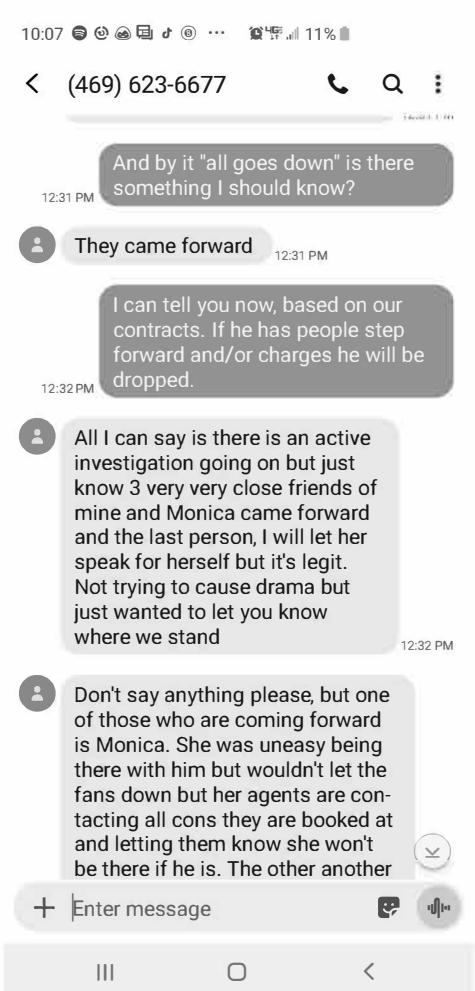

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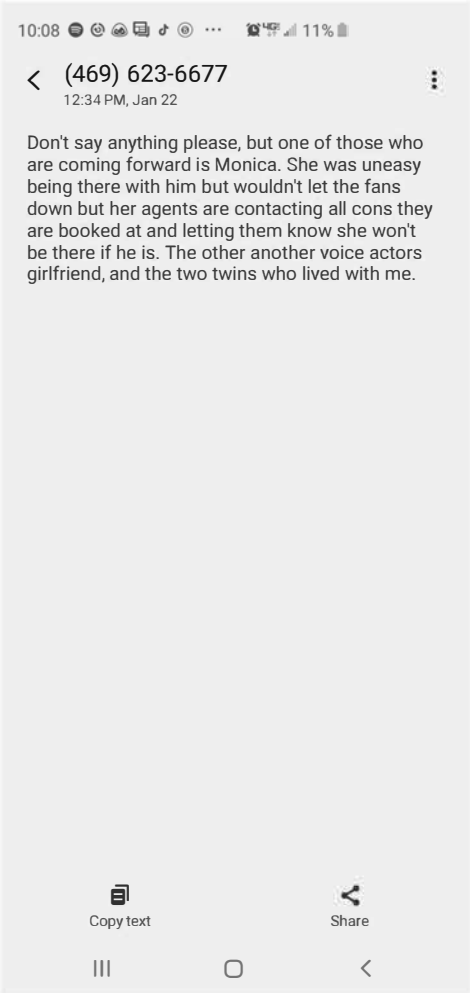

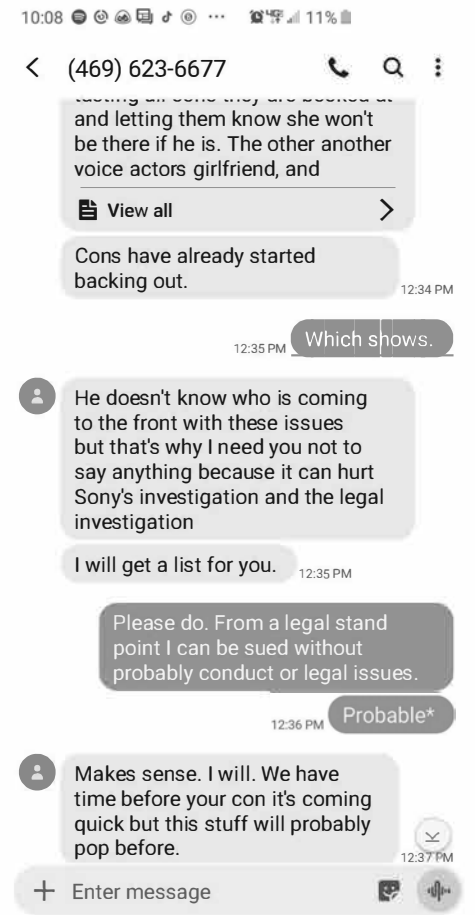

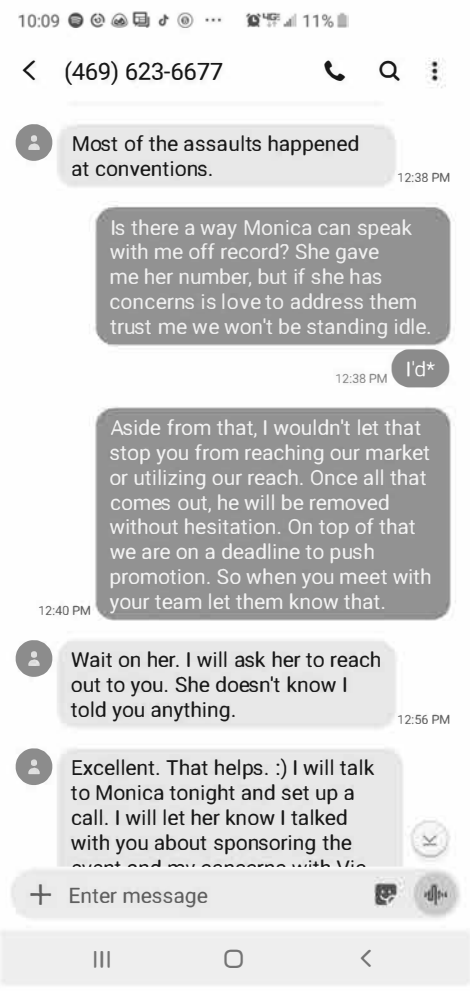

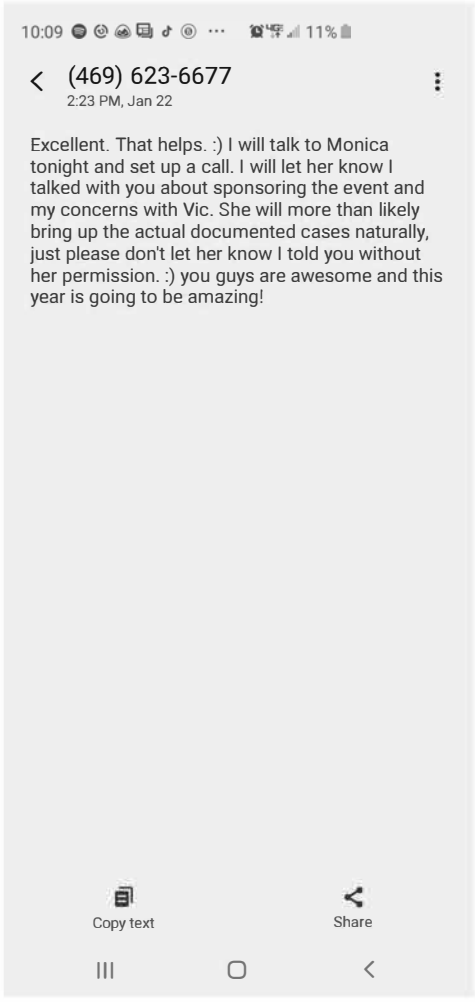

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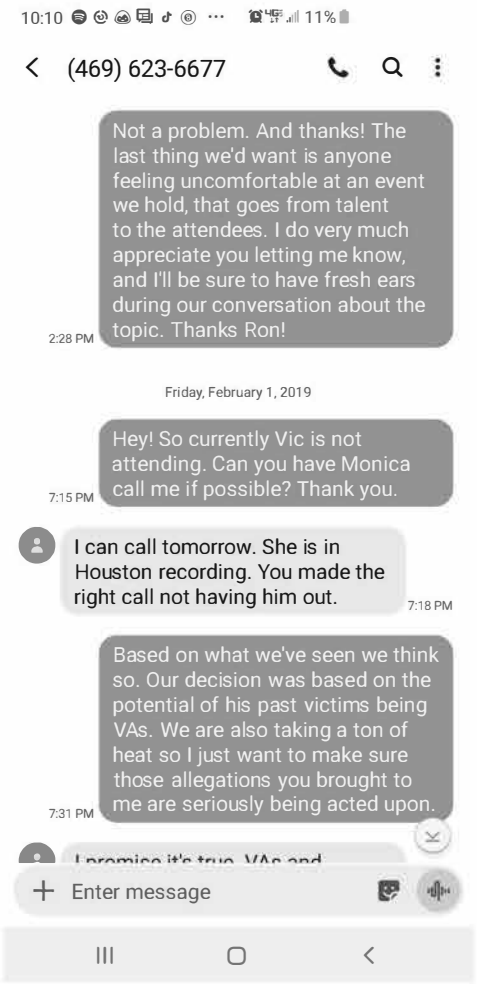

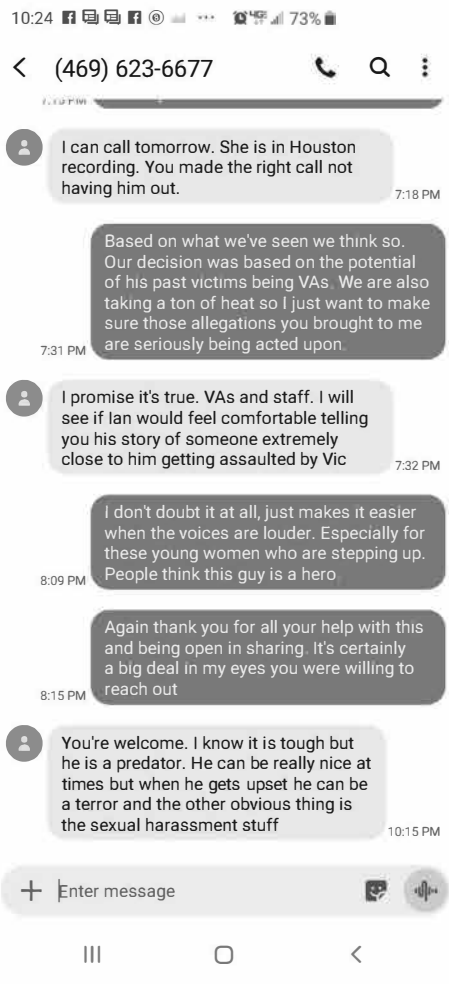

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Exhibit D

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CAUSE NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	§	IN THE DISTRICT COURT
v.	§	
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, AND RONALD TOYE,	§	141st JUDICIAL DISTRICT
Defendants	§	TARRANT COUNTY, TEXAS

UNSWORN DECLARATION OF CHUCK HUBER

I, CHUCK HUBER execute this unsworn declaration and state as follows:

1. My name is CHUCK HUBER, and I reside in Tarrant County, Texas. I am over the age of eighteen years and competent to make this Declaration. I have personal knowledge of the facts stated in this Declaration, and these facts are true and correct.

2. The facts in this Declaration should not be construed to condone Vic Mignogna's behavior especially as it relates to his infidelity toward Michelle Specht which was personally heartbreaking and horrible.

3. I have been an Anime Voice Actor or VA since 1998 and have performed over 200 roles.

4. I have attended over 150 anime conventions.

5. I have been a voice actor for Funimation since 1998 and am intimately familiar with the work environment at Funimation.

6. I am friends with several employees of Funimation and have had direct communication with former CEO Gen Fukanaga, Karen Mika, Justin Cook and Colleen Clinkenbeard through my years of employment at Funimation.

7. I have been a voice actor for Okratron5000, a company owned by Chris Sabat, since 2004 and have been an employee of Deep Space Mustache, a film company founded by Chris Sabat, during 2012-2013.

8. I have been friends with Plaintiff, Victor Mignogna ("Vic"), for at least 10 years.

9. I have been friends with the Defendants', Jamie Marchi and Monica Rial

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for at least 10 years.

10. I know Ron Toye from his relationship with Monica Rial.

11. The first time I heard Vic's name was in a conversation in 2003 or 2004 with Chris Sabat. This occurred while I was recording for a Funimation property at Okratron5000.

12. In that conversation, Chris Sabat verbally disparaged Vic's Christian faith and speculated that Vic was "actually gay" based on the way he dressed.

13. In that conversation, Chris Sabat stated that Vic was a pedophile who liked "little girls". Despite these statements, he did not express concerns about risks to fans, which I thought was odd.

14. During this conversation, there was no specific mention of Vic committing sexual harassment, sexual assault, inappropriate behavior with teenage fans or that Vic posed a risk to fans at conventions.

15. In approximately 2007, Vic began the practice of autographing artwork depicting anime characters for money at anime conventions.

16. Other voice actors (Jamie Marchi, Monica Rial and Chris Sabat) and other Funimation employees initially described that practice as "stealing from fans," "using fans," or "being an asshole." We all later adopted the same practices and currently follow those practices at conventions.

17. This behavior by voice actors (including Jamie Marchi, Monica Rial and Chris Sabat) and other Funimation employees toward Vic's successful business tactics demonstrates longstanding negative opinions about Vic.

18. In virtually all conversations I had with these voice actors when Vic was not present, disparaging remarks were made about Vic. Typical statements included "he's a prima dona, he's a douche, he's a diva, his clothes are gay," plus comments of his purported infidelity, dislike of his conservative Christian beliefs and personal attacks for his support of Donald Trump. All of these comments were made at one time or another by Monica Rial, Jamie Marchi, Chris Sabat, and others. All of them, however, conceded his ability to do his job.

21. In December 2013, at Yama-Con, I had lunch with Sean Schemmel and Sonny Strait.

22. Sean Schemmel tried to persuade me to participate in a derogatory video about Vic known as the "Vince Mangina VA pedophile video". The video was to portray Vic as a pedophile. I refused because Vic is my friend and

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he is not a pedophile.

23. Most of the time when I interacted with Sean Schemmel, he attacked Vic for pushing his Christian faith on fans at conventions and for Vic's purported sexual promiscuity.

24. In 2016, I was at Funimation and witnessed a producer at Funimation, warn other Funimation employees of Vic's arrival and address Vic negatively with directors at Funimation.

25. In approximately 2016-2017, a director employed at Funimation, told me that Vic would never get a directing job at Funimation because he was "such a douche." This conversation happened at Funimation. I advised Vic of this conversation. Vic later told me he addressed this issue with Justin Cook, a member of Funimation management.

29. In my opinion, the voice actors and Funimation employees described above were overly preoccupied with disparaging Vic.

30. Over the last decade, I was around Vic, the Defendants' and other Funimation employees hundreds of times. Until January 2019, none of them directly accused him of sexual assault or sexual harassment in my presence.

31. Until January 2019 negative discussions about Vic Mignogna in my presence were accompanied by laughter and derision but never included concern for any alleged victims or named specific victims. Vic has always been a joke to a certain clique of influential Funimation employees for decades but never a threat.

32. Vic indicated to me that in 20 years of working at Funimation he had never been warned of any complaints about his behavior.

33. Vic told me he had a meeting with a producer at Funimation, in approximately 2018 specifically to discuss any issues with his behavior. He stated that there was no mention in this meeting of his having committed sexual harassment, sexual assault or his having behaved in an inappropriate manner at Funimation or at any conventions. He stated that she told him that he was "difficult to work with" because he sometimes asked directors to do additional takes when the director was satisfied with his initial take.

34. Senior Fumimation directors have described the work environment at Funimation to me as a "Den of Poison," "Kafka Nightmare," and "Orwellian Slave Factory."

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35. My experience working at Funimation was unpleasant. It is well known that if one falls out of favor with certain people (including Chris Sabat) or if one tries to do anything to change the working conditions, that person will not be rehired as a voice actor. I felt threatened with not being used as a voice actor in subsequent projects if I complained about the work environment.

36. Funimation posted no employment policies regarding sexual harassment in the workplace or at conventions.

37. Funimation did not provide an employee handbook to me, Vic, Jamie Marchi and Monica Rial.

38. In the twenty (20) years I worked at Funimation, it was very common for employees, voice actors, writers, producers, directors to hug and kiss each other at the Funimation offices. Raunchy and sexual comedy was extremely common. Sexual relationships between Funimation employees and voice actors was common. No one was ever disciplined or terminated for this conduct.

39. When Sony acquired a majority interest in Funimation in late 2017, a "no hugs" policy was announced. Funimation employees and voice actors largely ignored this policy at first.

40. The voice actors (including Jamie Marchi and Monica Rial) and other Funimation employees talked and flirted freely at Funimation on a regular basis, though this did become less common after Sony instituted the "no hugs" policy.

41. When the Dragonball Kai was being recorded in 2007, I heard rumors that actresses had been recast at Funimation for refusing sexual advances by Funimation employees. I consider these rumors credible based on my experience working at Funimation and from direct messages received from a former DBZ cast member.

42. I also heard that actresses who participated in sex with Funimation/Okatron5000 employees were cast in roles. I consider these rumors credible based on my experience working at Funimation

43. When the trailer for the Dragonball Z: Super Broly movie was released, Vic did not voice the character of Broly, even though Vic was the only English actor who had ever voiced Broly up to that point.

44. During this timeframe, I sent a text message to Chris Sabat who responded that "if this has anything to do with Vic, I will not talk about

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it."

45. Chris Sabat is the owner of Okratron5000 and is a voice actor at Funimation.

46. Chris Sabat did most of the casting and recording for the Dragonball Z properties including for the movie Dragonball Z: Super Broly.

47. Chris Sabat engaged in negotiations, either directly or through Funimation for various projects with TOEI, owner of the Dragonball Z properties.

48. The voice actors employed by Funimation generally consider Chris Sabat to be a de facto manager at Funimation and they believe his approval and support is vitally beneficial to succeeding at Funimation and the conventions and the converse regarding his disapproval.

49. Chris Sabat has more influence at Funimation and other studios, including Roosterteeth and Toei, than Vic has ever had in the Anime industry.

50. I heard Chris Sabat and Sean Schemmel call Vic a pedophile numerous times before the allegations against Vic in January/February 2019 arose.

51. I have observed Chris Sabat on multiple occasions talk in a derogatory manner about members of Funimation management and other people he calls "friends."

52. I was aware of no rumors or accusations that Vic committed rape, sexual assault or sexual harassment until the accusations arose in January-February 2019 on the internet.

57. I was aware of no rumors or statements that identified any purported victims of sexual assault or sexual harassment by Vic until January-February 2019 on the internet.

58. Jamie Marchi and I have been close friends and writing partners since 2009. She never mentioned the hair-pulling incident at Funimation that she alleges occurred between Vic and her.

60. I believe Jamie Marchi would have mentioned the hair-pulling incident, if it had bothered her, since she is typically very outspoken. In addition, while Jamie Marchi, Monica Rial and other Funimation employees often expressed animosity towards Vic, they never claimed he had sexually harassed or sexually assaulted anyone. Their animosity was primarily due to his personality, his sexual promiscuity, his Christian faith and claims

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that he was difficult to work with.

61. In 2009. Jamie Marchi and I worked with Chris Sabat on CONdotcom.com, which was a website where voice actors could provide content for fans. Vic was a digital guest on that website and our primary marketing force because of his prolific convention schedule. In dozens of specific conversations about Vic there was never any concern about pedophilia or other criminal sexual behavior.

62. I have never seen Vic behave inappropriately with any fans of any age.

63. Although voice actors and other Funimation employees called Vic a pedophile and accused him of liking underage girls for years, they never said these things to Vic and never expressed any concerns about working with Vic or doing panels at conventions with Vic until 2019. Nor did they express concern for the convention fans until 2019.

64. The sexual assault and sexual harassment allegations by the Defendants and Funimation employees have seriously damaged Vic's career by inducing numerous conventions to cancel his appearances, by inducing producers and directors to not consider him or terminate him from projects.

65. Jamie Marchi, Monica Rial, myself and almost all other voice actors have kissed and hugged hundreds of fans at conventions, no matter their age.

66. I approached Jamie Marchi and Monica Rial to attempt a settlement between Vic and the Defendants' in early March 2019. Vic was not aware of my efforts.

67. I was initially supportive of what Jamie and Monica were doing because my understanding was that they were, with inflated versions of their stories, attempting to help the alleged underage victims of rape and sexual assault by Vic, which they along with Michelle Specht directly told me existed, who would otherwise be too afraid to speak out. I never considered Jamie and Monica to be victims of attempted rape or sexual assault by Vic.

68. I drafted a proposed statement by Vic that included the phrase "I am a sex addict" because my conversations with Jamie Marchi and Monica Rial convinced me that Vic would have to admit some form of "guilt" for them to settle. Vic never saw or approved that phrase.

69. I am not educated about sex addiction nor am I an expert about sex addiction.

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70. I talked with Vic about sex addiction and advised him to speak with his counselor about it. I now believe his sexual activity and infidelities are more closely associated to the common narcissism and ego from men in his position. I believe Vic is sincere in his efforts with his counselor to correct the abject moral failings associated with his sexual behavior.

71. My settlement efforts were an attempt to help my friend Vic who was suffering tremendously, to protect Jamie and Monica from the difficulty of a lawsuit and to heal the Anime community, which has been seriously divided by the allegations against Vic.

72. During my settlement efforts. Todd Haberkorn told me that that Chris Sabat, Ron Toye and Sean Schemmel told him that he was in danger of never working at Funimation again because Haberkorn retained the same law firm as Vic.

73. I also feared that my twenty (20) year voice acting career at Funimation and personal reputation would be damaged by retaliation for my association with Vic.

74. I contacted Gen Fukanaga, the then CEO of Funimation to discuss my concerns with Chris Sabat's gaslighting of Sean Schemmel, damaging use of his authority toward actors and his attempts to destroy my career, in early March 2019 who met with me and advised that Vic would lose and have to pay via something he had learned about called an Anti-SLAPP motion. He also, in response to my specific concerns about Chris Sabat, said that he had been friends with Chris Sabat for 17 years and he did not believe me. This meeting occurred on March 5, 2019 at 2:30 p.m. in Gen's office approximately a month to a month and a half prior to Vic filing the current pending lawsuit.

75. I and my wife fear direct, planned and specific retaliation from Chris Sabat and those loyal to him in response to this Declaration that will be damaging to my reputation and career.

76. I have known Vic for many years, and I do not believe he has ever sexually approached anyone past the point of them telling him no.

77. I believe Vic utilized his position of privilege in shameful ways in attempts to obtain sex.

78. In my experiences with Vic, if someone acted like they did not want to be hugged or kissed, he stopped immediately.

79. Funimation employees, including Jamie Marchi, Monica Rial and Michelle Specht have advised me more than once since February 2019

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that criminal charges are coming against Vic. In response I encouraged them to help these alleged underage victims of rape and sexual assault to come forward. When asked to provide specifics to these allegations they couldn't or refused to do so.

80. When I was told about the contents of the "confidential" investigation undertaken by Tammi Denbow on behalf of Funimation, my opinion was that Funimation, Jamie Marchi and Monica Rial acted together and with encouragement from Chris Sabat and Sean Schemmel, to destroy Vic's career and life.

81. I believe that the purported incidents investigated by Tammi Denbow occurred off Funimation property and not at Funimation events. The one incident that purportedly occurred on Funimation property occurred prior to Sony's acquisition of Funimation, thus the "no hugs" policy from Sony was not in effect (i.e. there were no signs about the policy hung around the Funimation office).

81. I do not believe that Vic kissed Sarah Bachmeyer without her consent. I have never heard rumors of Vic behaving sexually inappropriately at Funimation.

82. Funimation has supported the accusations made by Defendants' that Vic is a sexual predator, pedophile and rapist by supporting the accusations directly with their own public statements (I, as a member of the public, viewed the Tweets made on February 11, 2019 by Funimation as supporting the accusations against Vic and asserting Vic was fired for sexual harassment and threats).

83. It appears to me that Ron Toye, Monica Rial and Jamie Marchi have been speaking with Funimation's tacit or overt consent in tweets that have been made by them since January 2019.

Chuck Huber

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Jurat

(Sensitive Information Redacted Per T.R.C.P. 21)

My name is Chuck Huber, my date of birth is xx/xx/xxxx, and my address is xxxx xxxxx xxxx xxxxxx, Fort Worth, Tarrant County, Texas 76112 and USA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, State of Texas, on the 2nd day of September, 2019.

Chuck Huber

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Exhibit E

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CAUSE NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	§	IN THE DISTRICT COURT
v.	§	141st JUDICIAL DISTRICT
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, AND RONALD TOYE, Defendants	§	TARRANT COUNTY, TEXAS

UNSWORN DECLARATION OF VICTOR MIGNOGNA

I, VICTOR MIGNOGNA, hereby execute this Unsworn Declaration and state as follows:

1. My name is Victor Mignogna and I live in Tarrant County, Texas. I am over the age of eighteen years and competent to make this Declaration. I have personal knowledge of the facts stated in this Declaration, and these facts are true and correct.

2. I have never sexually assaulted or sexually harassed anyone or attempted to do so.

3. I have never physically assaulted any woman or attempted to do so.

4. I have never forced (or attempted to force) anyone to kiss me, hug me, or engage in any sexual activities.

5. I have never fondled, kissed without consent, or otherwise inappropriately had contact with underage people or adults.

6. I have never inappropriately touched, rubbed, stroked, struck any female fans, guests, staff or acquaintances.

7. I have never had sexual contact with anyone without their consent.

8. I have never attempted to sexually assault, sexually harass, touch inappropriately, or have any nonconsensual contact with Monica Rial or Jamie Marchi.

9. I have read Jamie Marchi's July 18, 2019 affidavit, attached as Exhibit A to her Motion to Dismiss. I have (a) never grabbed her hair and pulled it

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down; (b) never whispered sexually suggestive or violent statements to her; and (c) never pressed my lips to ears, as as she claims in the affidavit.

10. Tammi Denbow contacted me on January 25, 2019. She stated she was an executive with Sony and and advised me that she wanted to interview me by phone about several allegations that had been reported against me. We discussed the three allegations below:

    a. An accusation that, at an anime convention, I ate a jellybean thrown at me by Monica Rial in a sexually suggestive manner. I did not eat the jellybean in a sexually suggestive manner; I made no sexually suggestive comments; and no one, including Monica Rial appeared to interpret the action and comments as being sexual in nature. I told this to Tammi Denbow.

    b. An accusation that I invited two adult females (who had flirted with me numerous times over the previous year) to my hotel room at an anime convention, then sexually harassed or assaulted them. I did not sexually harass or assault them. I expressed romantic interest in them, they declined and left the room. I did not harass, intimidate or pressure them in any way. I told this to Tammi Denbow.

    c. An accusation that I kissed a Funimation Productions, LLC ("Funimation") employee, Sarah Bachmeyer, without her consent, in her office. I did share a single, consensual kiss with her. There was no coercion or lack of consent. I told this to Tammi Denbow.

11. Immediately after this conversation, I emailed Tammi Denbow about the investigation. The emails attached as Exhibit A are true and correct versions of the emails we exchanged.

12. Before the consensual kiss in her office at Funimation, Sara Bachmeyer and I had corresponded via text, phone calls and in person for at least a year or more. I regularly stopped by her office while in the studio recording just to say hi. She appeared to welcome my interest in her and appeared to be interested in me. Eventually asked to kiss her, and she agreed. We only kissed that one time. In the years since the kiss, she has never expressed any outrage or anger to me.

13. Tammi Denbow did not mention or ask me about any other incidents. In particular, she did not mention or ask about the purported attempted sexual assault in 2007 against Monica Rial (alleged by Monica Rial in her affidavit), nor did she mention any of the alleged hair-pulling incidents asserted by Monica Rial and Jamie Marchi.

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14. I was assured by Tammi Denbow that the investigation and its results would be kept confidential.

15. I was informed by telephone on Saturday January 26, 2019 or Monday January 28, 2019 that I had been terminated by Funimation.

16. By mid-January, 2019, I had valid contracts with dozens of conventions to appear as a guest in 2019. At least a dozen cancelled my appearance by the time I filed this lawsuit and they are listed in my Amended Petition. Emerald City Comic Con, Fan Expo Toronto, Fan Expo Orlando (aka MegaCon) and Planet Comic Con also cancelled my appearances, despite having contracts with me to appear.

17. I have appeared at a number of conventions in 2019. They are listed below, along with the amounts I earned at each (all amounts rounded down to the nearest thousand dollars):

    a. Kamehacon - $37,000
    b. Savannah - $13,000
    c. Central PA - $5,000
    d. Puerto Rico - $11,000
    e. BakAnime - $5,000
    f. Anime Matsuri - $30,000
    g. Super World Con - $5,000
    h. Ireland - $12,000
    i. Liberty - $14,000
    j. Jacksonville NC - $12,000
    k. Bubba Fest - $17,000

18. Five of the conventions that cancelled me were as large or larger than Anime Matsuri. These were: Emerald City Comic Con, Florida Super Con, Fan Expo Toronto, Fan Expo Orlando (aka MegaCon) and Planet Comic Con. It is reasonable to expect that I would have earned similar amounts at each of these conventions that I earned at Anime Matsuri ($30,000), but I would have earned a minimum of $20,000 per convention because they were all larger in attendance than Anime Matsuri. I would have expected to earn at least $5,000 at each of the smaller conventions that cancelled my appearances, extrapolating from similar sized conventions that I did attend (i.e., the conventions listed in the previous paragraph other than Anime Matsuri).

19. The owners or managers of the conventions that cancelled me all stated that the cancellation was due to the allegations of sexual assault being made by defendants. Several also mentioned the Funimation investigation as motivating the cancellation.

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20. I have never been cancelled at a convention before 2019.

21. I have no memory of anyone named Robin Michelle Blankenship or Robin Michelle Blankenship-McConnell and no memory of any of the events she described in her affidavit that was attached to Rial and Toye's Motion to Dismiss.

22. I have read the affidavit of Kara Edwards, attached to Rial and Toye's Motion to Dismiss. I did not commit any of the improper acts she claims I did in the affidavit, such as knocking on her door repeatedly, huggng for an uncomfortably long time, saying things like "open the door; nobody has to know" or "you know you want this", etc. I did not sexually assault her, I did not attempt to sexually assault her and I never engaged in any contact without her consent.

23. I have read the affidavit of Lynn Hunt, attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct she claims I engaged in, including the specific allegations in paragraphs 3-9 of the affidavit.

24. I have read the affidavit of Faisal Ahmed attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct he claims I engaged in, including being "overly friendly" with female cosplyers, behaving inappropriately with Erica McCord, Kelly Loftus or Leah Hamilton.

25. I have read the affidavit of Mary Reese attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct she claims I engaged in, including manipulating and tricking young girls, being "demanding", being a bully, being intentionally rude to her, grabbing Kara Edwards' hair and forcefully pulling it back, demanding that Kara Edwards' table be moved, etc.

26. I have read the affidavit of Whitney Falba attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct she claims I engaged in, including being disrespectful to staff, inappropriately touching females, having underage female fans in my hotel room, etc.

27. I have read the affidavit of Nesha Perry attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct she claims I engaged in, including stroking anyone's leg without permission, and grabbing anyone's hair and pull it back while whispering into their ear.

28. I have read the affidavit of Emmett Plant attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct he claims I engaged in, including stroking anyone's leg without permission, and grabbing anyone's hair and pull it back while whispering into their ear.

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29. I have read the affidavit of Adam Sheehan attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct he claims I engaged in, including "having [any] predatory tendencies", kissing, touching or stroking female fans inappropriately, etc.

30. I have read the affidavit of Kelly Loftus attached to Rial and Toye's Motion to Dismiss. I deny that I ever "hit" on her. I also deny all improper conduct she claims I engaged in, including hugging, touching or kissing her without her consent or doing so inappropriately.

31. I have read the affidavit of John Prager attached to Rial and Toye's Motion to Dismiss. I deny all improper conduct he claims I engaged in, including "stalking" or behaving inappropriately with Mari Iijima. Being a sexual predator, touching women inappropriately or without their consent.

32. I have read the affidavits of Elizabeth Yost and Theresa Yost, attached to Rial and Toye's Supplement to Motion to Dismiss. I deny that I touched either of them without consent or in any inappropriate way. I did invite them to my room (after they had flirted with me numerous times over the previous year), but when their made their lack of interest clear, I bid them goodbye and they left freely and peacefully. I did not ask them to do a strip tease show for me. I did not try to kiss either of them. I did not later express a desire to kiss them nor did I ever become angry with them. They never cried, teared up or acted afraid in my presence.

33. As a result of the stress and anguish caused by Defendants, I have been diagnosed with depression and have been prescribed Zoloft. Zoloft was prescribed after the defamatory assertions by Defendants.

34. I have never asked my fans to harass, attack or mistreat anyone.

35. In late 2017, I walked into Coleen Clinkenbeard's office and asked her why I was not cast more often. At the time, I was directing *Juni Taisen*. She told me that (a) they did not like casting people who weren't local and (b) that some directors thought I was "difficult" because I occasionally requested additional takes even though the director was satisfied. She stated that there were no other concerns about my conduct and did not mention any reports of inappropriate conduct. I told Chuck Huber of this meeting.

36. Until the January 25, 2019 communication with Tammi Denbow, I had never been reprimanded or questioned for any inappropriate conduct of any kind.

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Victor Mignogna, Declarant

Jurat
(Sensitive Information Redacted Per T.R.C.P. 21)

My name is Victor Mignogna, my date of birth is xx/xx/xxxx, and my address is xxxx xxxxxx xx, xxxxxxxxx, xxxxxxx xxxxxx, xxxxx xxxxx and USA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, State of Texas, on the 2nd day of September, 2019.

Victor Mignogna

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Exhibit F

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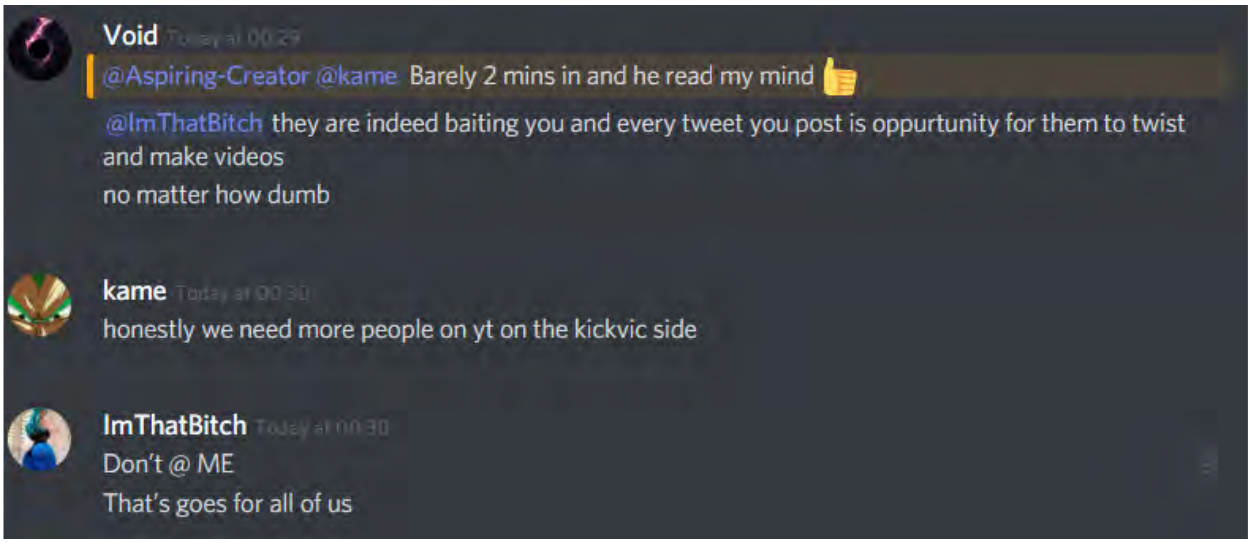

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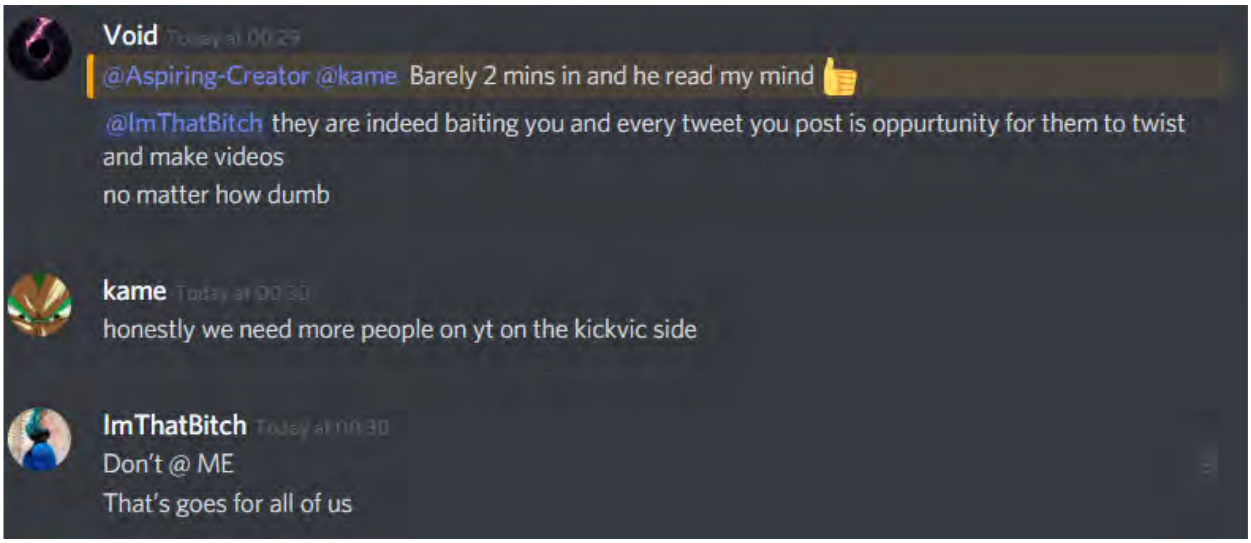

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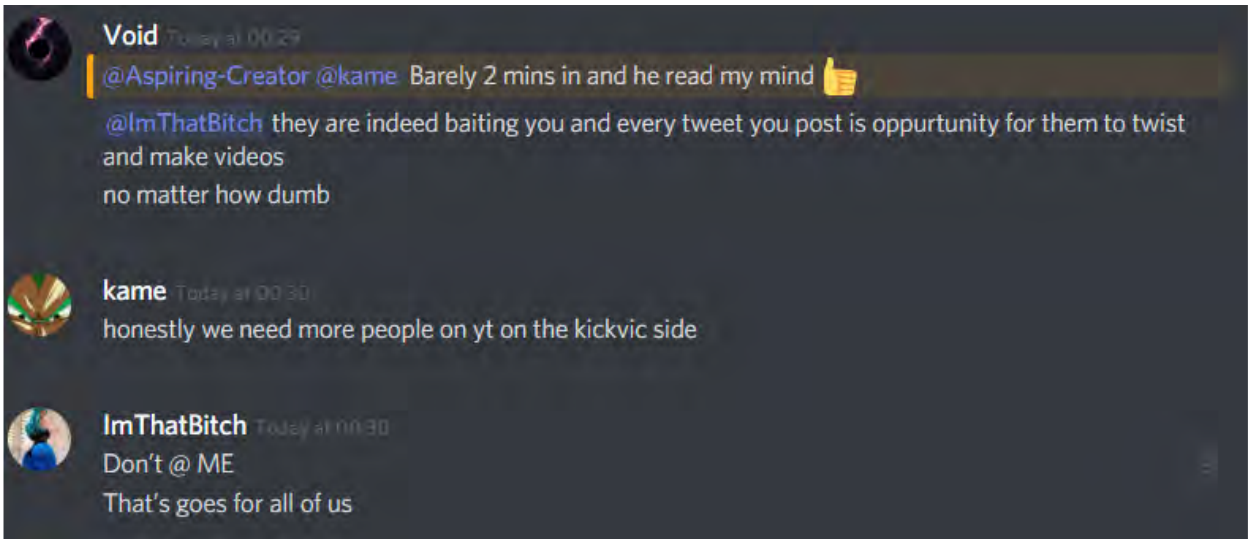

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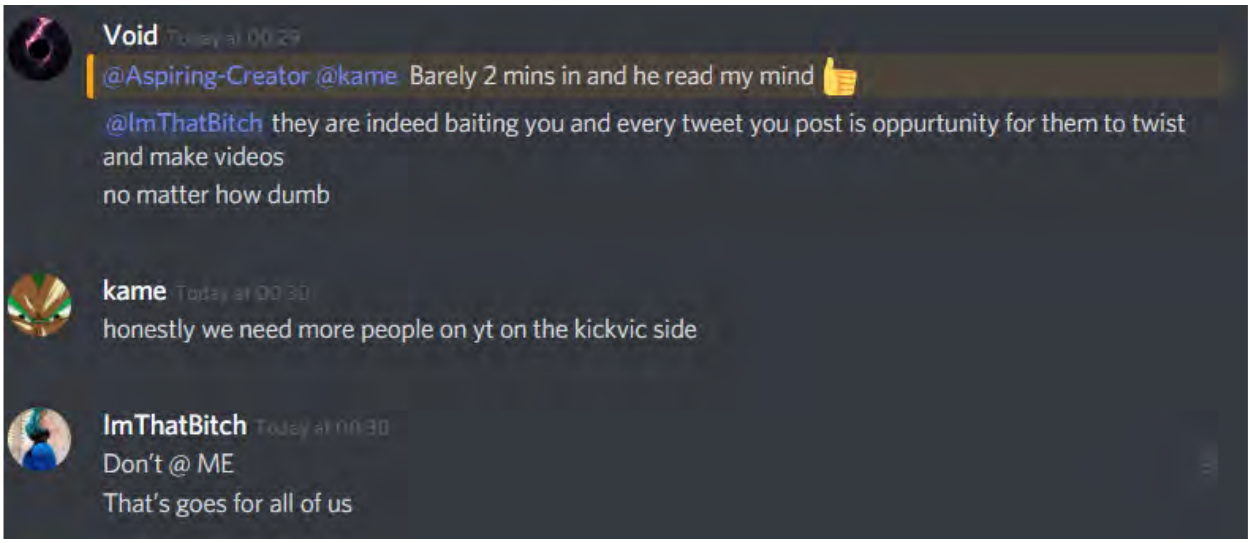

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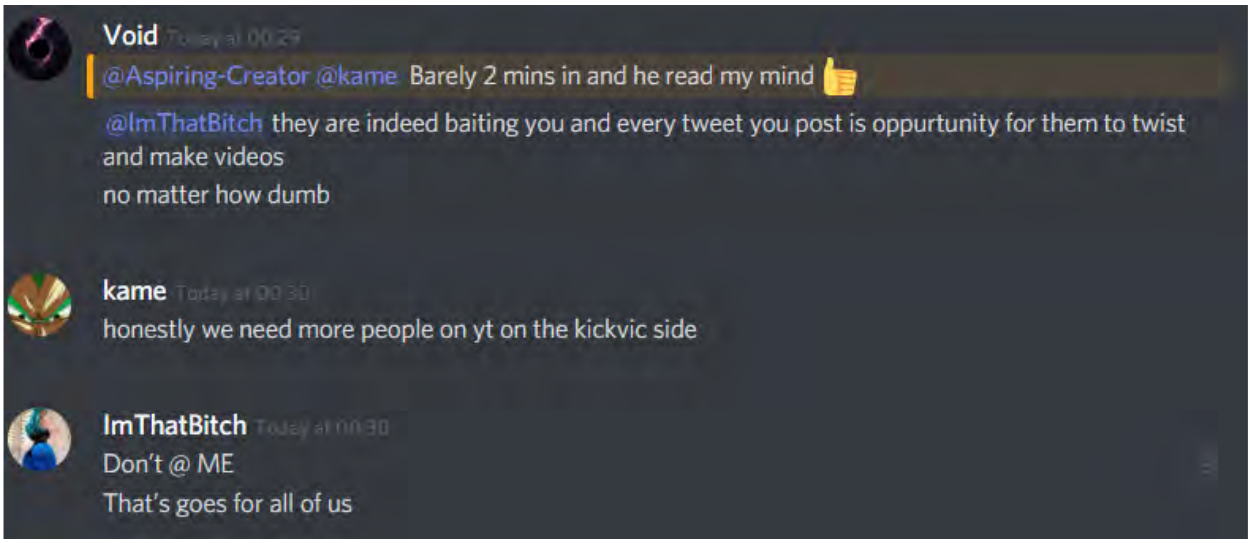

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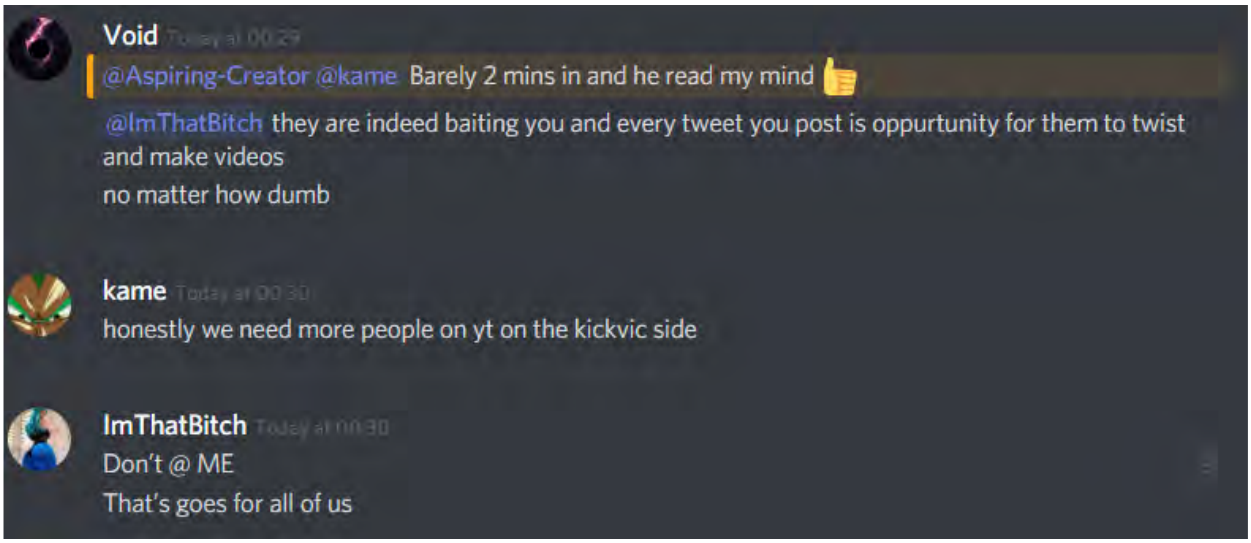

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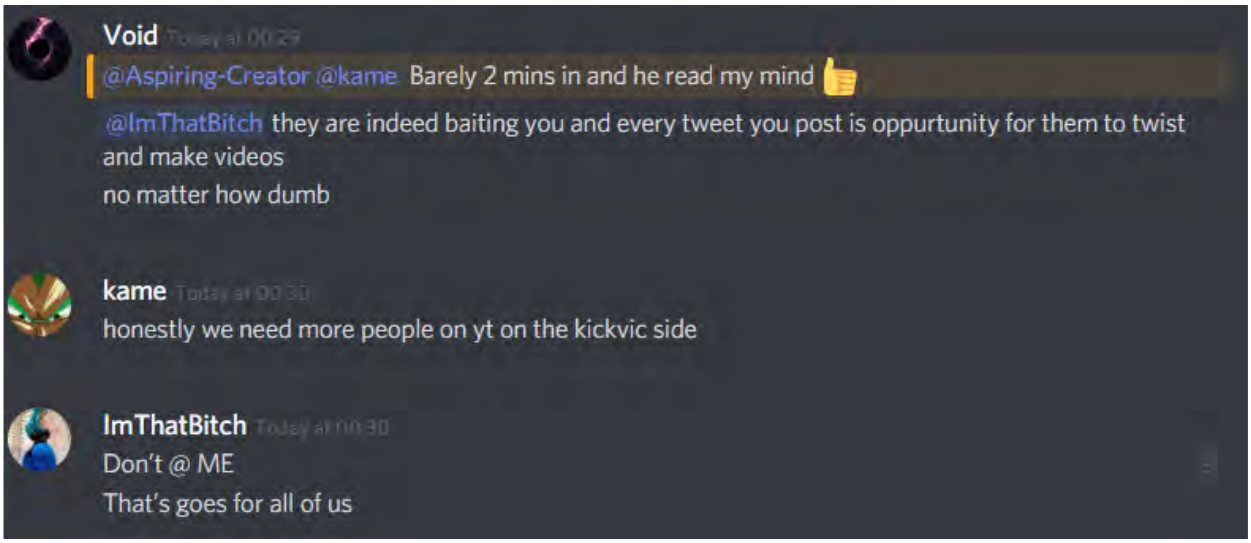

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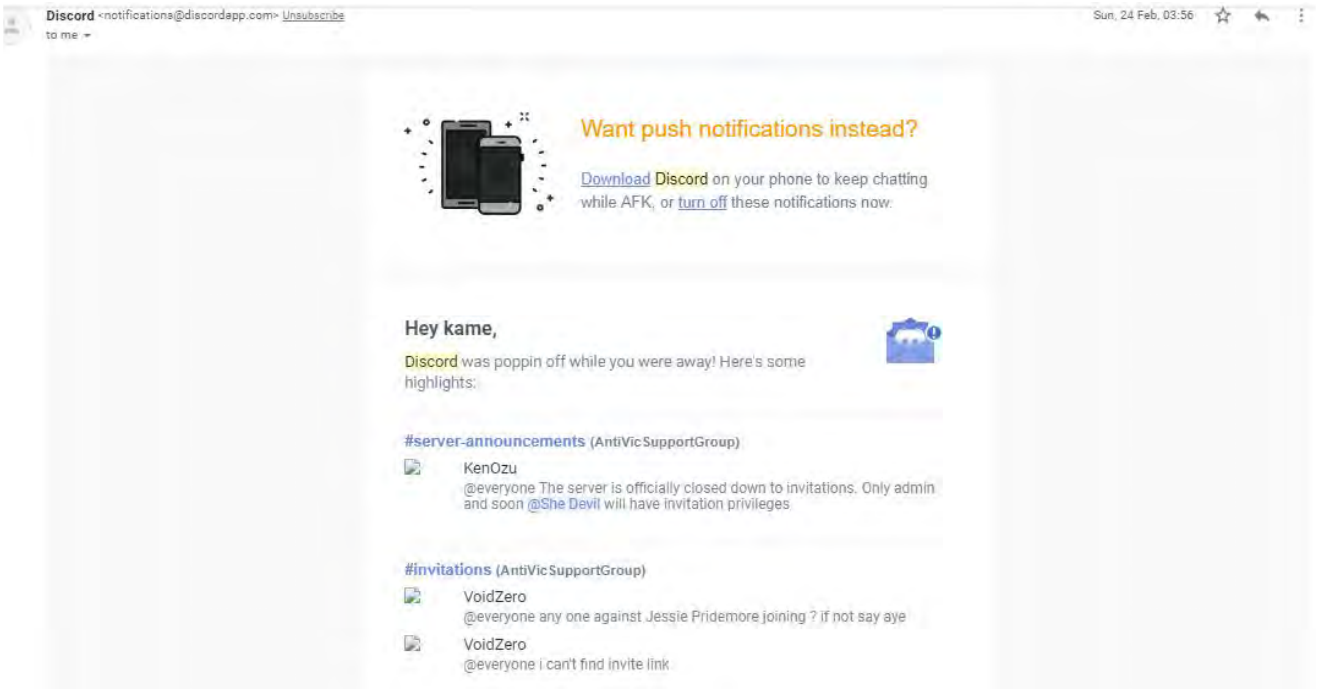

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Hey kame,

Discord was poppin off while you were away! Here's some highlights:

#server-announcements (AntiVicSupportGroup)

KenOzu
@everyone The server is officially closed down to invitations. Only admin and soon @She Devil will have invitation privileges

#invitations (AntiVicSupportGroup)

VoidZero
@everyone any one against Jessie Pridemore joining ? if not say aye

VoidZero
@everyone i can't find invite link

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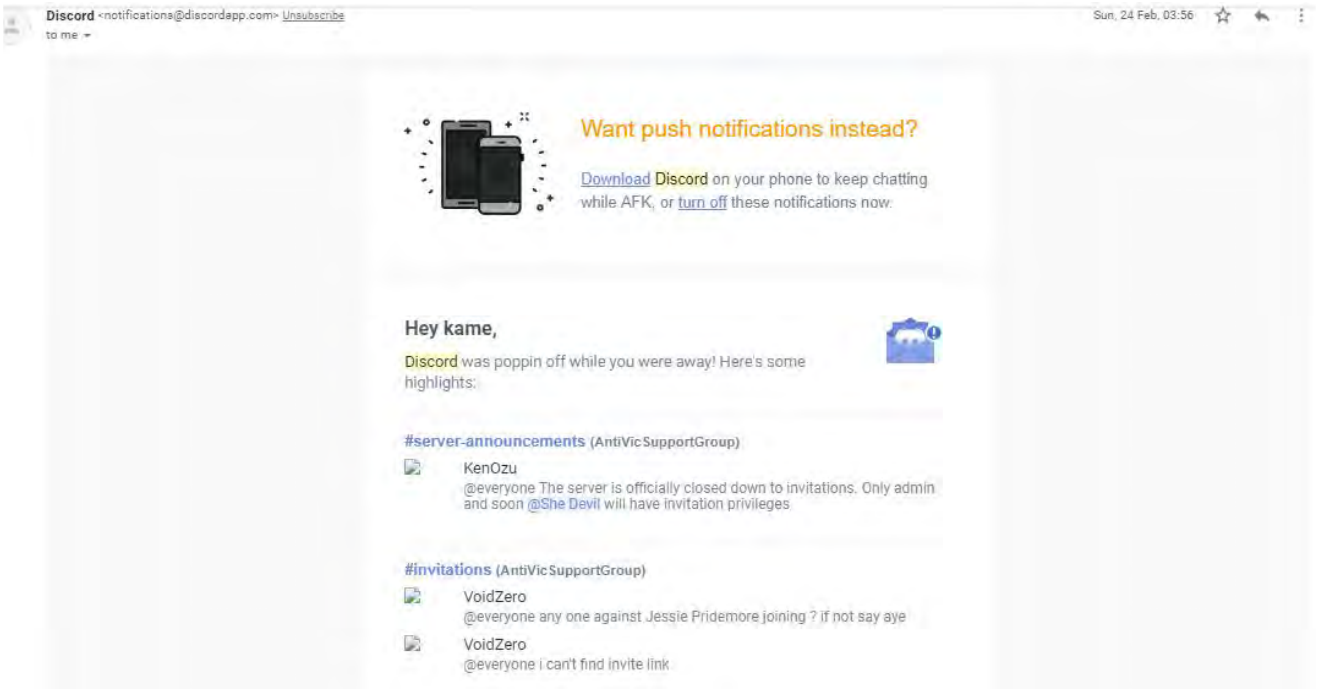

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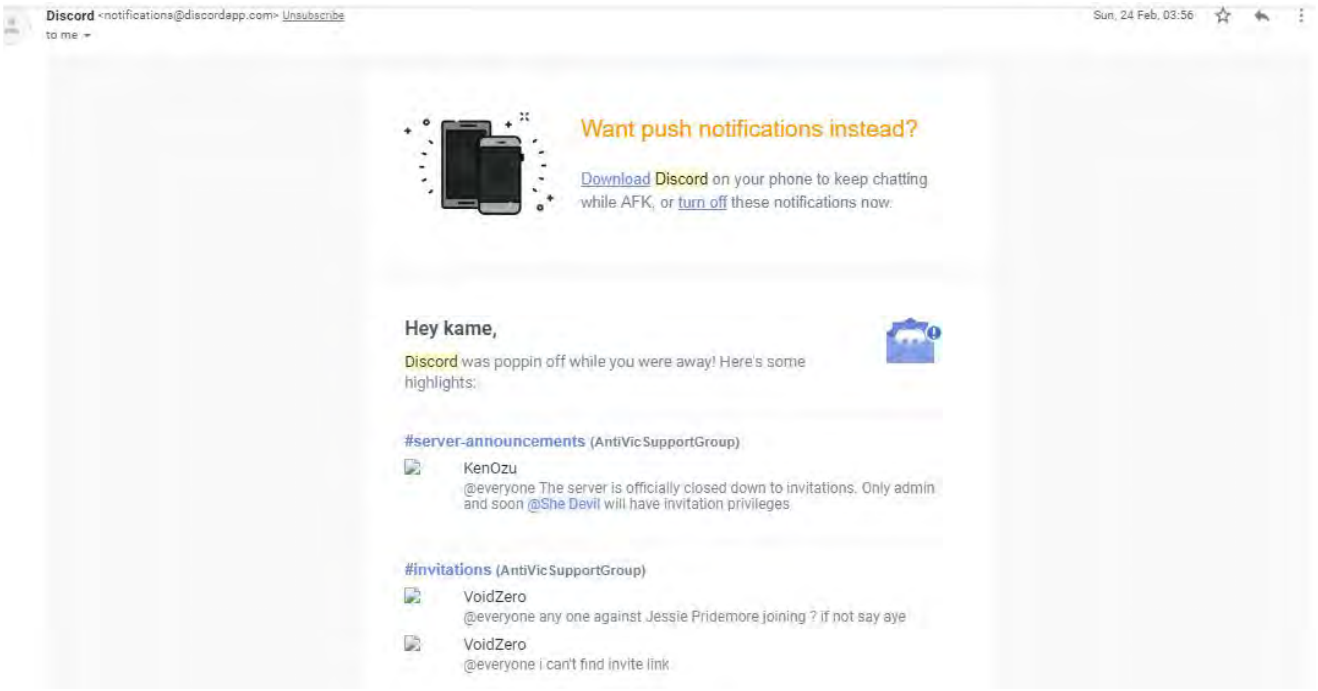

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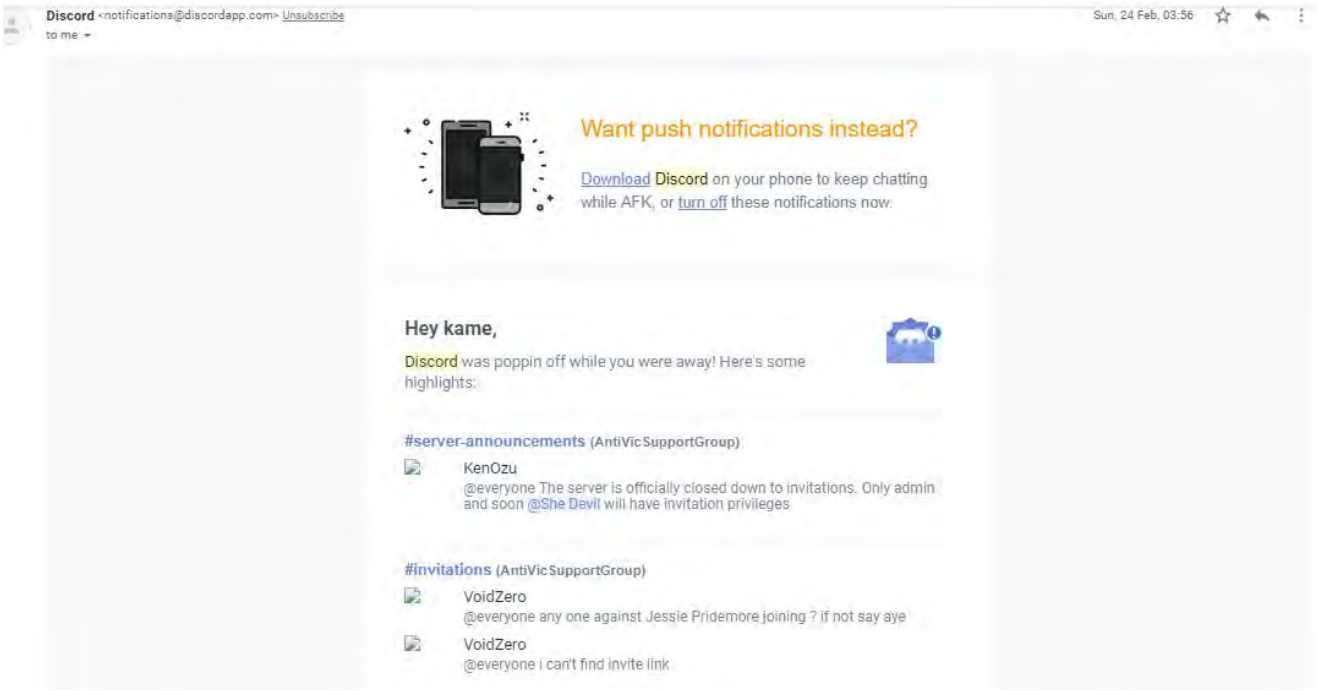

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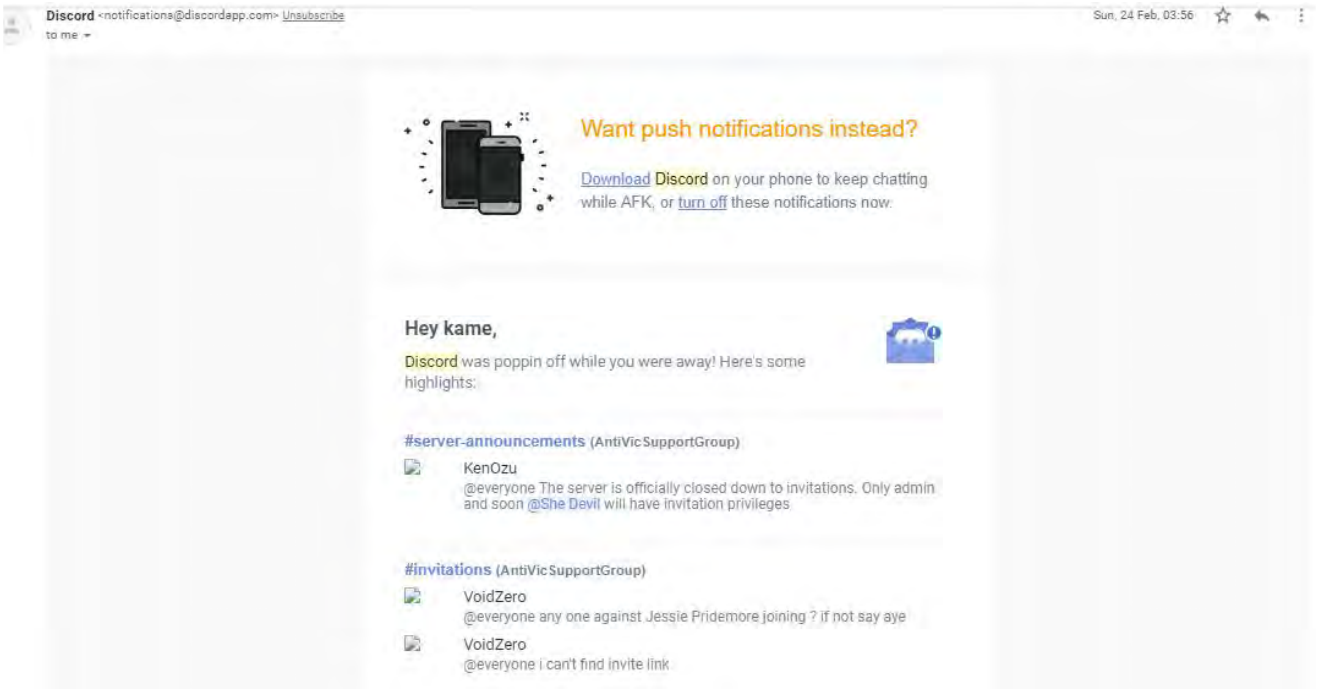

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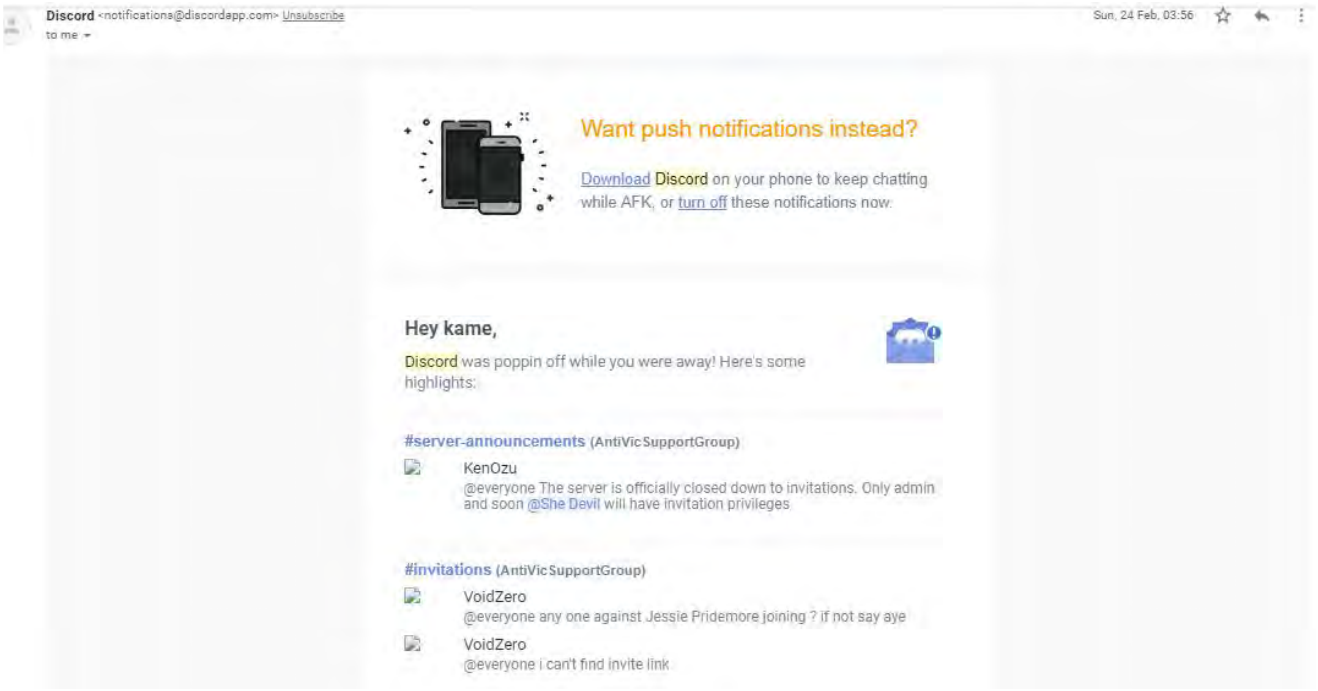

Discord <notifications@discordapp.com> Unsubscribe
to me
Sun, 24 Feb, 03:56

Want push notifications instead?

Download Discord on your phone to keep chatting while AFK, or turn off these notifications now.

Hey kame,

Discord was poppin off while you were away! Here's some highlights:

#server-announcements (AntiVicSupportGroup)

KenOzu
@everyone The server is officially closed down to invitations. Only admin and soon @She Devil will have invitation privileges

#invitations (AntiVicSupportGroup)

VoidZero
@everyone any one against Jessie Pridemore joining ? if not say aye

VoidZero
@everyone i can't find invite link

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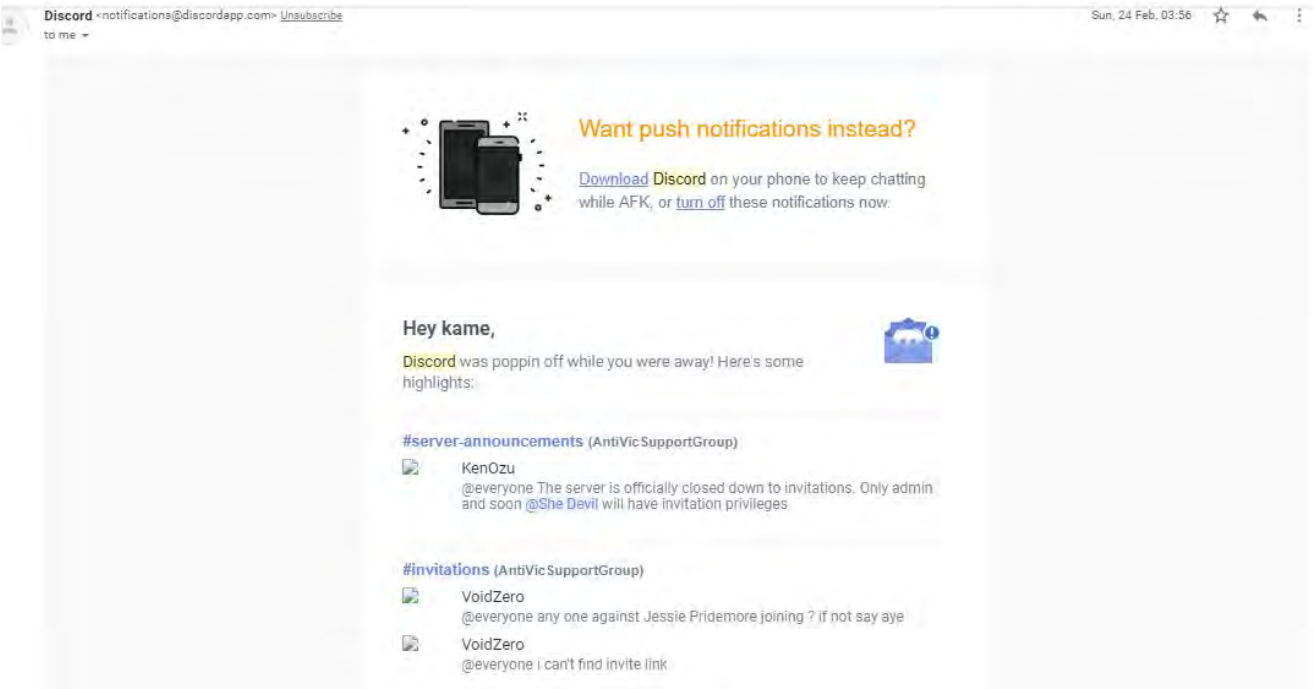

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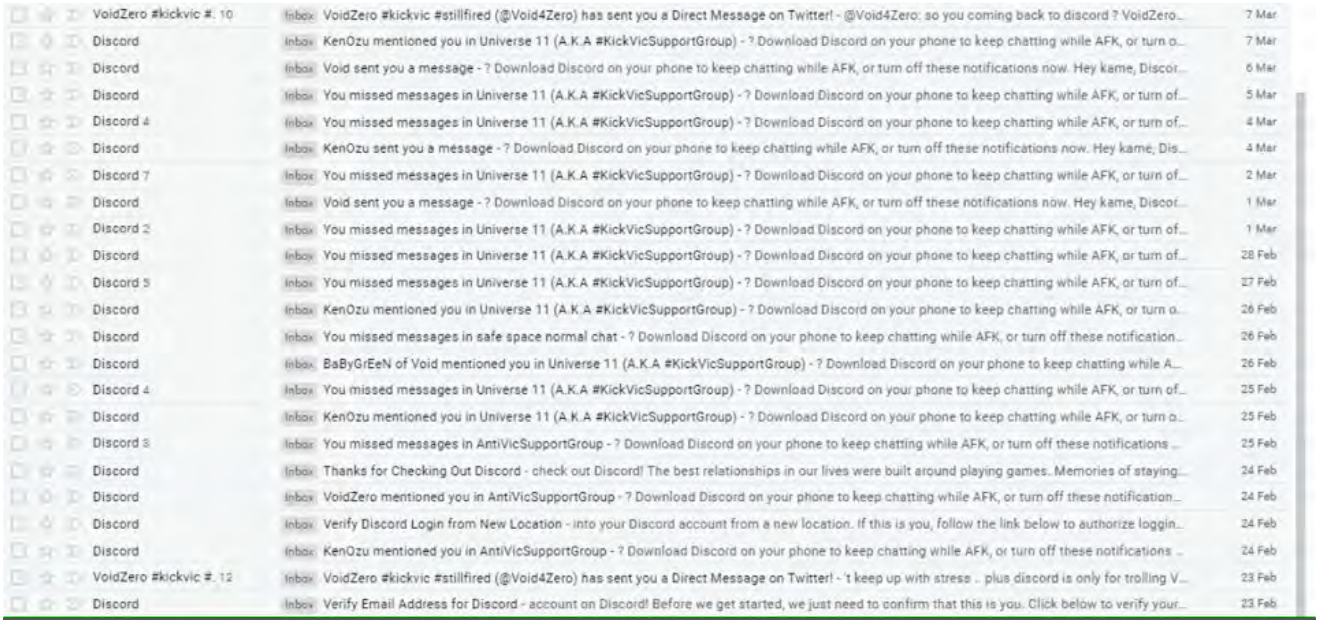

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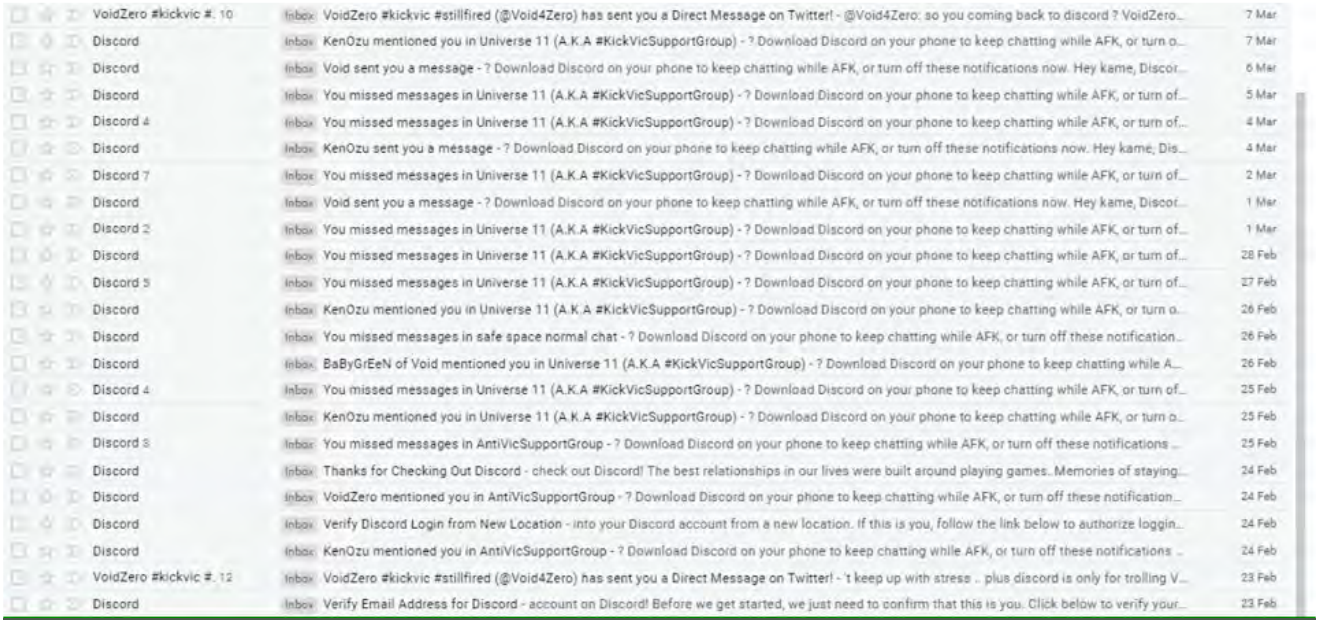

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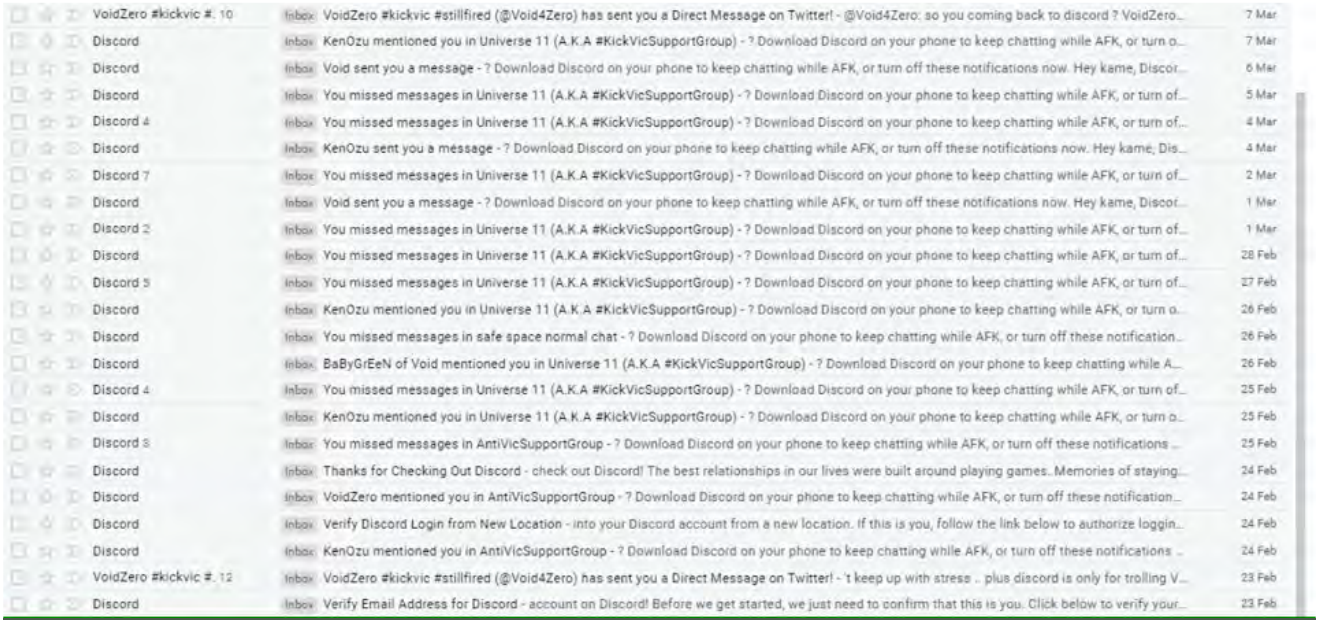

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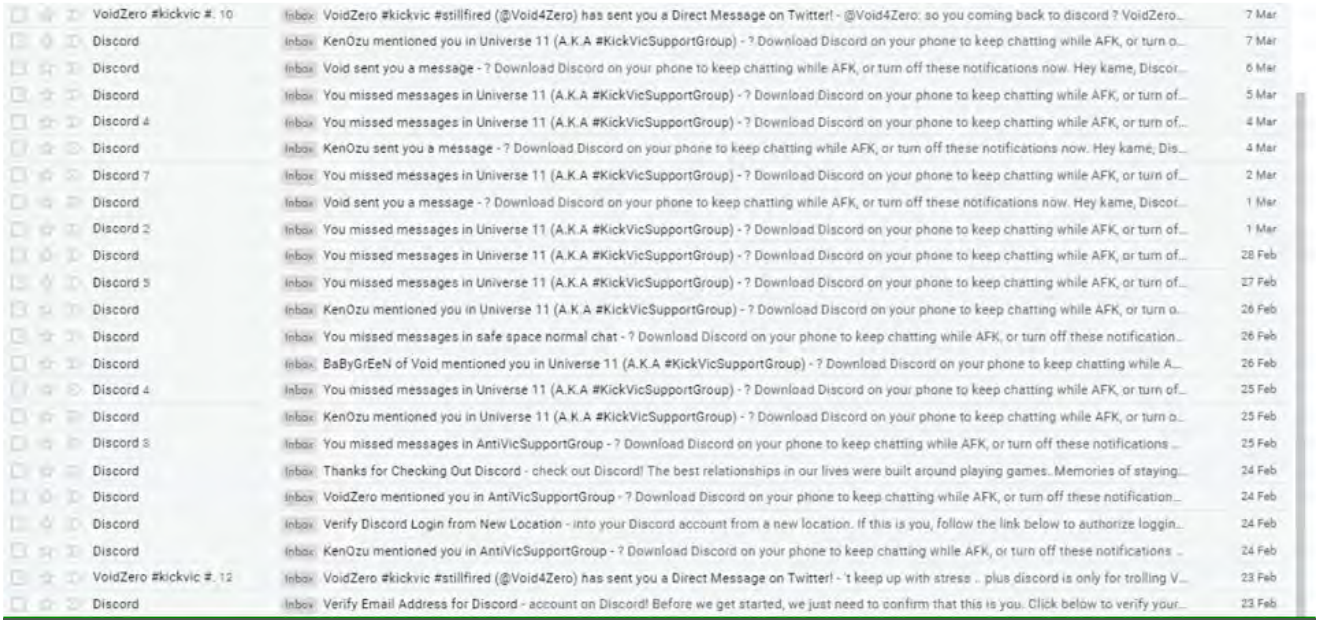

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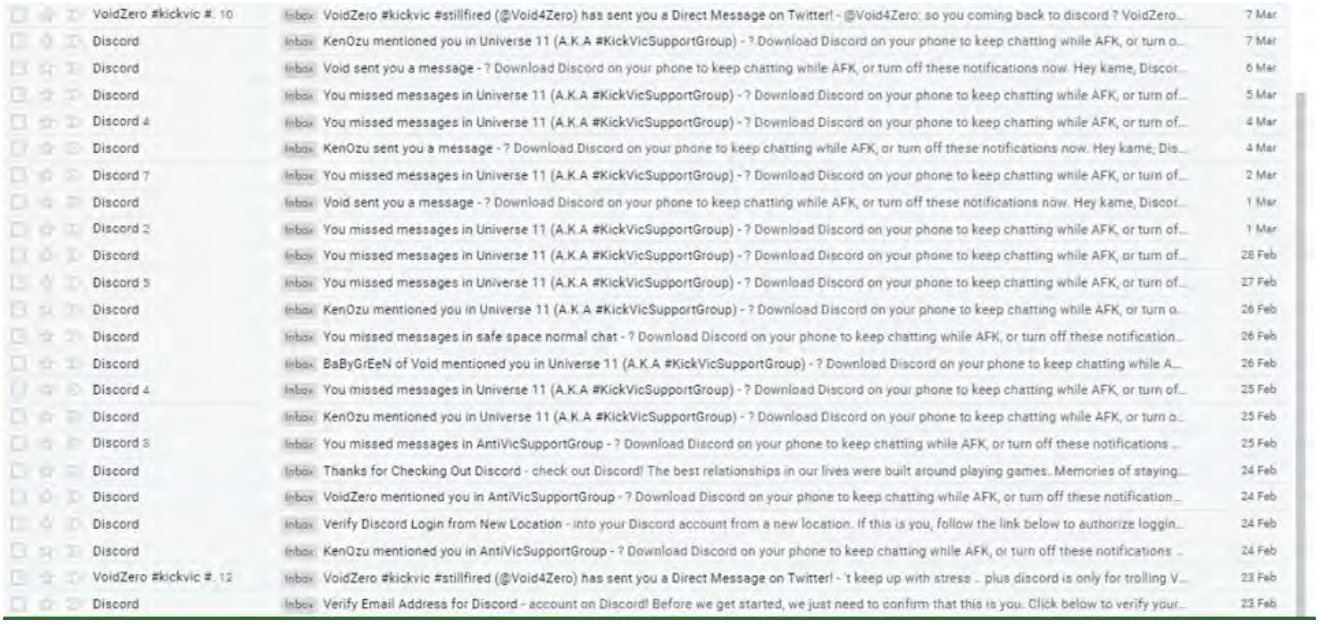

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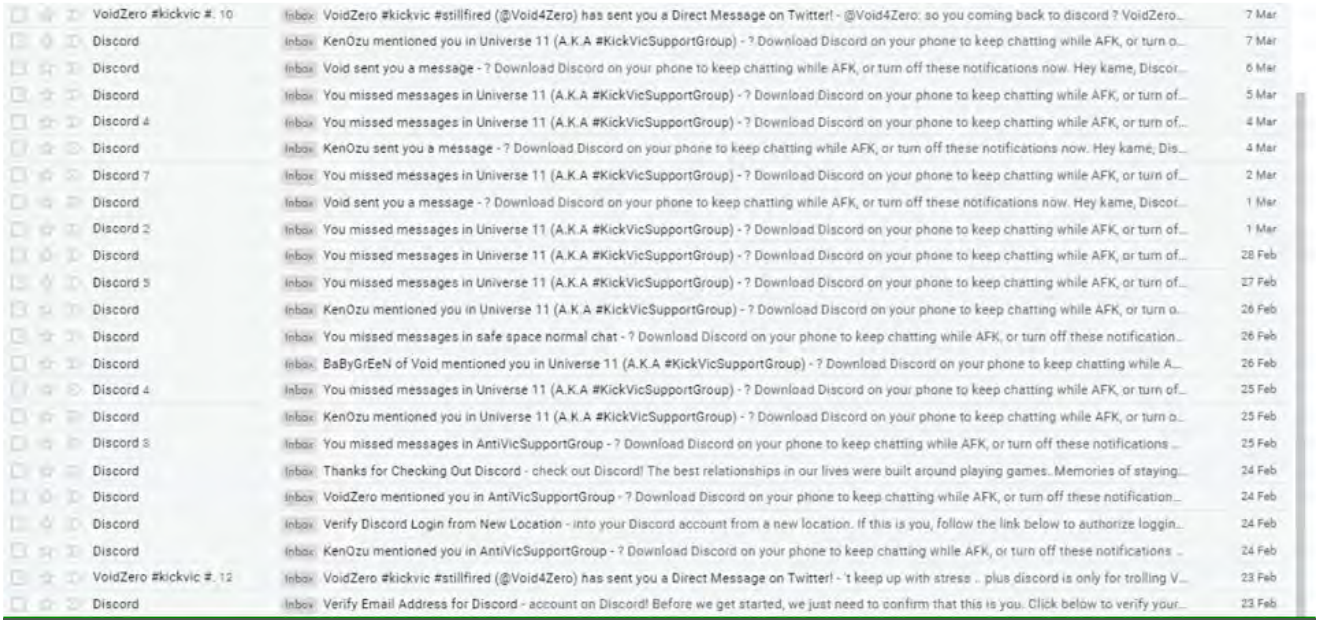

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Discord	Inbox	Thanks for Checking Out Discord - check out Discord! The best relationships in our lives were built around playing games. Memories of staying...	24 Feb
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Discord	Inbox	Verify Discord Login from New Location - into your Discord account from a new location. If this is you, follow the link below to authorize loggin...	24 Feb
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Discord	Inbox	Verify Email Address for Discord - account on Discord! Before we get started, we just need to confirm that this is you. Click below to verify your...	23 Feb

14 45 122

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15 Jun 2019 - 16 Jun 2019
2018 2019 2020
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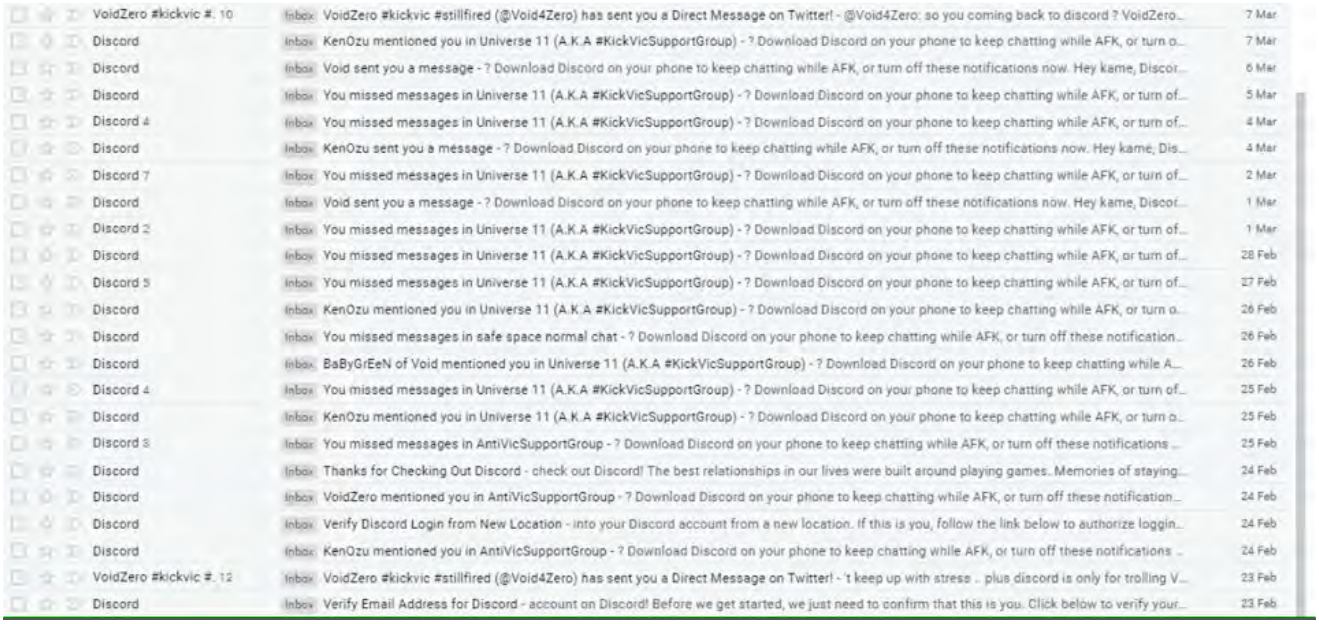

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DBZUK kamehouse
@DBZUk_kamehouse

ツイート 1,350 | フォロー 134 | フォロワー 82 | いいね 972

フォローする

DBZUK kamehouse
@DBZUk_kamehouse

22•autisticandproud/Dragon Ball fanatic/brexiteer/pro equality/antifeminist/istandwithvic

uk

2012年8月に登録

画像/動画

Twitterを使ってみよう
登録してあなただけのタイムラインを作りましょう

アカウント作成

こちらもおすすめです · 更新

Alex Williams
@AlexWil36830076

ツイート ツイートと返信 メディア

DBZUK kamehouse @DBZUk_kamehouse · 5日
Before marchi even tweeted about it / made it public there was a lot said in that discord but the majority will still remain secret sadly .

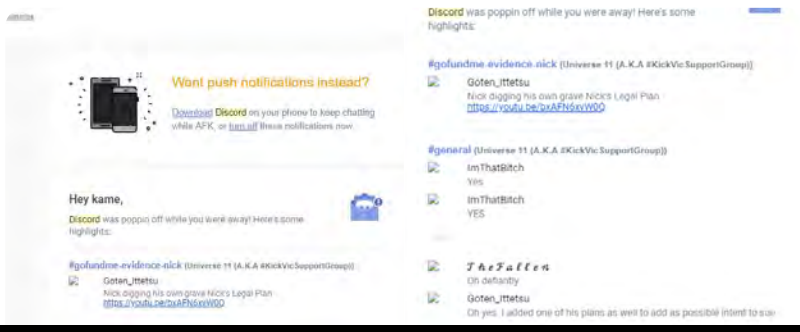
このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 5日
I have no proof of it but there was a message she devil posted on the discord abount marchi's charity Gofundme .....

1

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日



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フォローする

31.4K na Tweet

#LivePD
20.1K na Tweet

#TSBTonight
1,961 na Tweet

Whataburger
Texas chain Whataburger sells majority ownership to Chicago investment bank

#WhatITakeSeriously

Chael
7,266 na Tweet

Patrick Reed
2,588 na Tweet

Renfroe
1,538 na Tweet

Brian McCann
4,539 na Tweet

© 2019 Twitter Twitterについて
ヘルプセンター 規約 プライバシーポリシー
クッキー 広告について

1 2

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日

Okay Vic, no, just no bud. No, no, no, no, no, dear lord no. Let me be very clear, you should not be within walking distance of any convention right now. What you should be in walking distance of is a counselor's office and I mean a PROPER counselor's office. Not legal counseling, I'm talking a counselor who you go to and work out your problems with. It's then and ONLY then after you do a whole bunch of it if you come back, rebuild your career from the ground up and show you're a changed man? Again I'd be cautious but I'd be fine if after a few weeks you've shown yourself to be better since I am firmly of the belief that no one is truly beyond redemption. I do NOT need to hear you go on with "Oh please ask these cons to invite me! I really want to be invited to these cons!" No Vic, no. This is a perfect time for self-reflection. A time to truly look back at your past and come face-to-face with some hard truths and go "Oh you know what? Maybe cons aren't best for me. I am someone with a ton of problems who has made a lot of mistakes, I truly need to work on fixing these mistakes." not a time to send out your legion of cock-sucking sycophants to spread the gospel about your name and how you are such a sweet and innocent man who's being slandered. Fuck off with this crap Vic, please fuck off.

Dave (AC)
The way he says Norfolk is like he's trying so desperately to not pronounce it as "Norfuck".

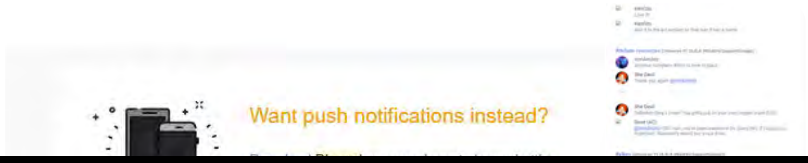
Dave (AC)
Also, hearing that he mentioned Liberty University kind of makes me feel a bit off knowing he actually graduated from there and the shit he pulled.

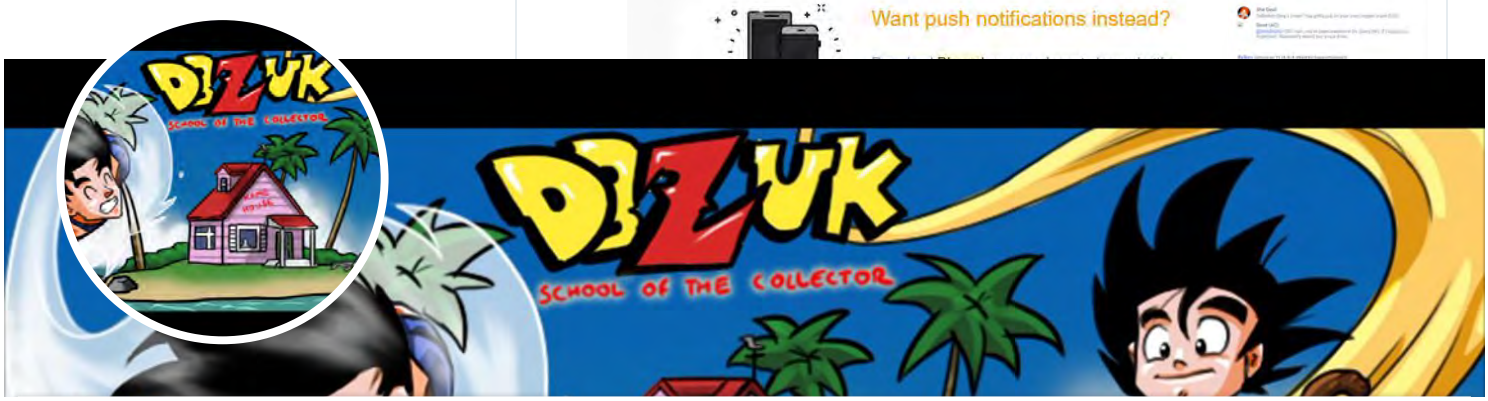
Dave (AC)
Well Vic, yes I agree there's so much anger and meanness going on right now, you should probably know that very well by now considering you were the one who posted this. Now I am willing to believe you genuinely did not intend for death threats to be sent but seriously, how many times has this happened? Because going back, I have found there have been many so instances where you've basically sent your impressionable and fanatical fanbase out to spread the "truth" about you which has gone pretty disastrous because basically you give them no direction aside from "Do the thing." which when considering these are young children most of the time, you actually need to exercise more caution otherwise the next thing you

1 2

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日





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フォローする

DBZUK kamehouse @DBZUk_kamehouse · 6日

#inspiration (Universe 11 (A.K.A #KickVicSupportGroup))

BaByGrEeN of Void
uploaded an attachment: zzH38M0Jz-pZFieA1KP6CMIj_tpe6H2K0s7gi6SLTOPYw.jpg

#memez (Universe 11 (A.K.A #KickVicSupportGroup))

AllyC
uploaded an attachment: 2129b445-5bfe-45b2-879d-5e81602f1b07.png

BaByGrEeN of Void
uploaded an attachment: VrKStOW.jpg

PepperMonster
My coping mechanism for unrelenting online harassment.

KenOzu
Me too.

KenOzu
I don't have a lot of hobbies outside my profession but being part of the Japanese animation community is a big plus. I tell people if they don't know what to get me for my birthday, find an anime I like and buy me key frames or keyframe books

FUN FACT #8

Prior to adding Blood Elves, Alliance outnumbered Horde on most World of Warcraft servers.

1 2

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日

Want push notifications instead?

Download Discord on your phone to keep chatting while AFK, or turn off these notifications now.

Hey kame,

Discord was poppin off while you were away! Here's some highlights:

#vic-related (Universe 11 (A.K.A #KickVicSupportGroup))

Goten_Ittetsu
Someone is gonna have to bail me outta jail because I'm gonna murder him! I have so many ideas and it's great!!!!

#general (Universe 11 (A.K.A #KickVicSupportGroup))

BaByGrEeN
1)dbz – duh 2)Attack of titan - good plot characters and deep over reaching plot 3)code geass n deathnote n Mirai Nikki (Future diary) - love sick

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DBZUK kamehouse
@DBZUk_kamehouse

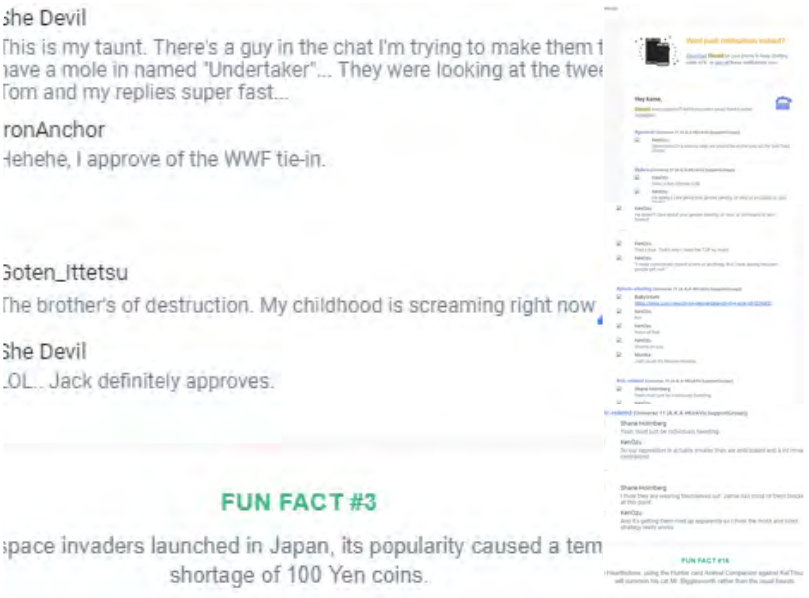
ツイート 1,350 | フォロー 134 | フォロワー 82 | いいね 972

フォローする

1 3

このスレッドを表示

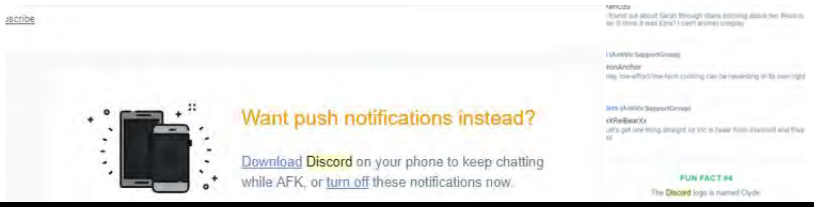
DBZUK kamehouse @DBZUk_kamehouse · 6日

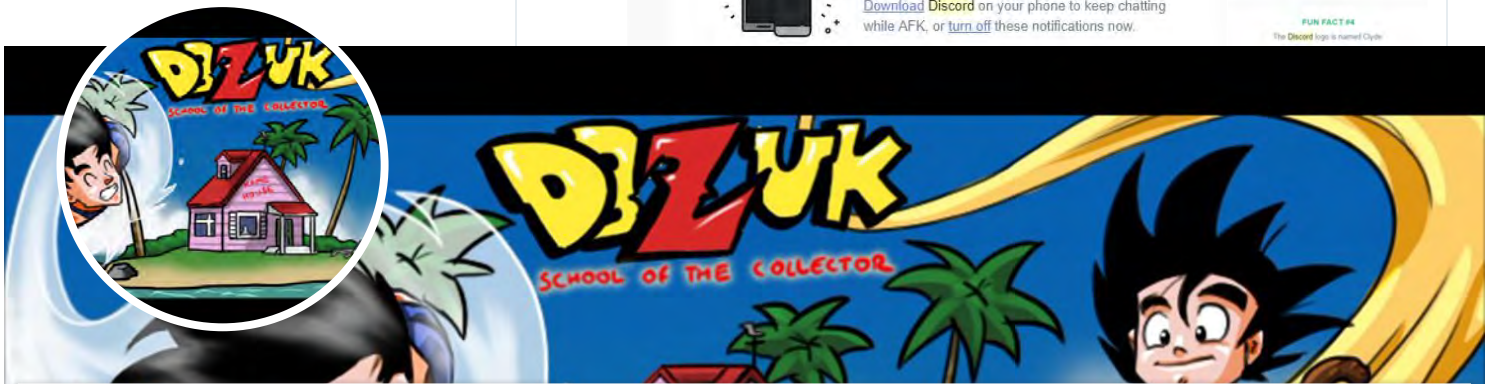


1 3

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日





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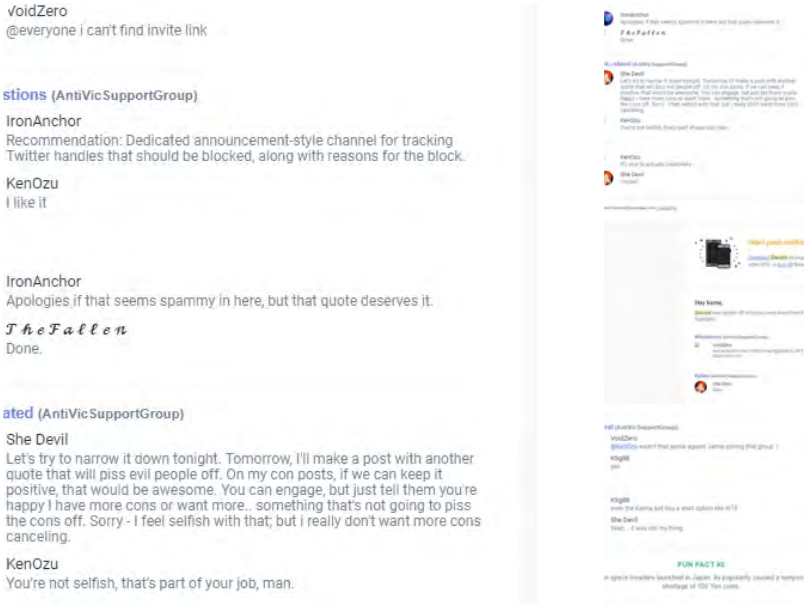
@DBZUk_kamehouse

ツイート	フォロー	フォロワー	いいね
1,350	134	82	972

フォローする

DBZUK kamehouse @DBZUk_kamehouse · 6日

so ill be in boxing prominent people in the #istandwithvic movement so they can get them in chronological order. also she devil is marchi just for context if thats needed

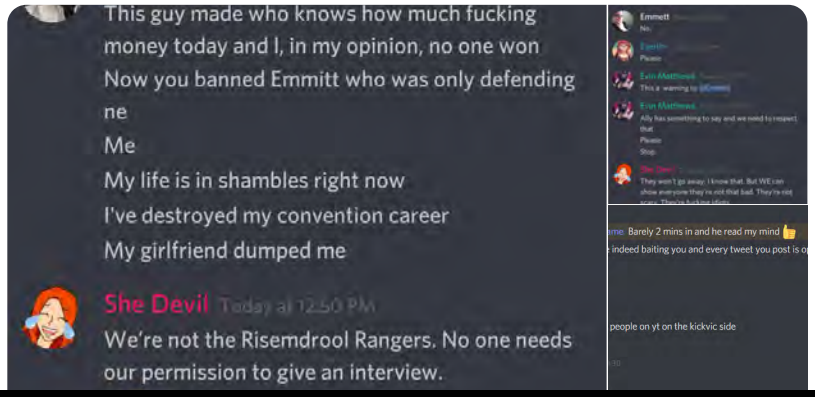


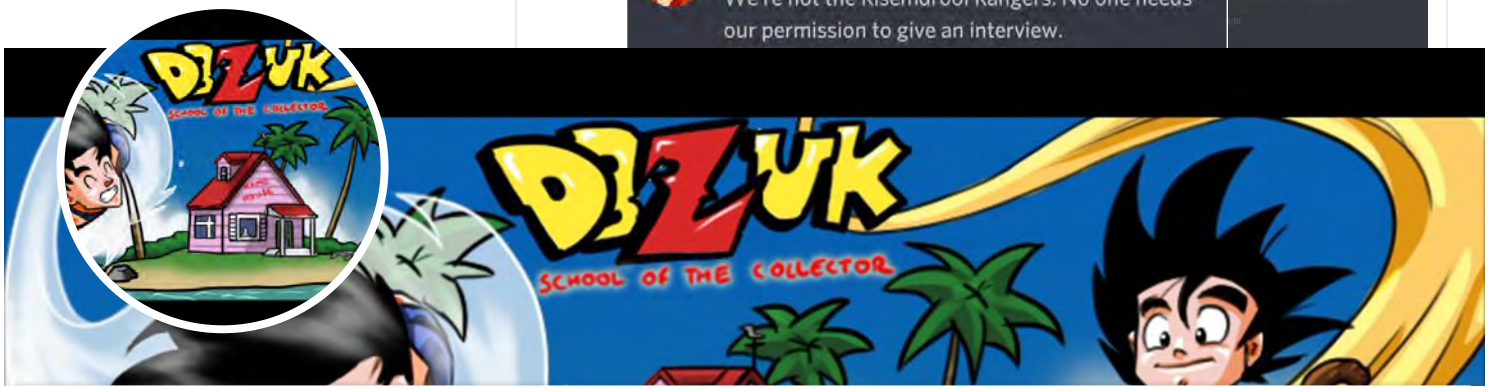
1 4

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日

here are the emails and screenshots i could find remnants of because remember i believe in the kickvic movement at the time so i wasn't taking screenshots people in the kickvic discord sent them to me . they might not upload in order #istandwithvic





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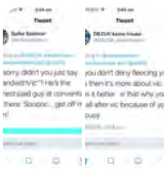
フォローする

DBZUK kamehouse @DBZUk_kamehouse · 6日
#IStandWithVic remember how I said I used to be part of kick vic and I was in a secret group with jaime marchi and Shane holmberg

1 4 13

このスレッドを表示

DBZUK kamehouse @DBZUk_kamehouse · 6日
Did spike spencer just confirm my suspicions? Is this witch hunt built upon jealousy of a successful man? #istandwithvic



DBZUK kamehouse @DBZUk_kamehouse
Did Spike spencer just confirm my suspicion of why all these voice actors are gunning for vic ? Is it out of jealousy?. #istandwithvic
このスレッドを表示

1 1 5

DBZUK kamehouse @DBZUk_kamehouse · 6日
The irony is that the anime all these voice actors work on promote sexual harassment so they should consider a career change #istandwithvic

2 6

DBZUK kamehouseさんがリツイート

Boris Johnson @BorisJohnson · 6日
Two years on from the devastating fire at Grenfell Tower, we stand with the families and friends of those who lost their lives. The most fitting tribute that our country can pay to the victims of Grenfell is to ensure that nothing like it ever happens again.

2,011 488 3,618

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フォローする

DBZUK kamehouse @DBZUk_kamehouse · 6月14日
Do voice actors use there social media clout to bully and silence anyone who dare to speak out against there actions? #istandwithvic

1 2

読み込みに時間がかかっているようです。
Twitterの処理能力の限界を超えているか、一時的な不具合が発生しています。やりなおすか、Twitterステータスで詳細をご確認ください。

Copy from re:SearchTX

Exhibit G

Copy from re:SearchTX

Jamie Marchi
@marchimark

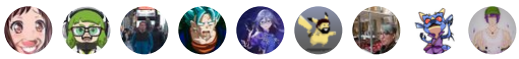
Follow

Replying to @AlishaNico @Rialisms

Yes, I want his head. I want his balls. I want him to feel an ounce of the pain he's cause others and then fucking choke on it. I want you to take his dick out of your ears so you can actually hear reality. But, you know, that's just me.

9:05 PM - 6 Feb 2019

40 Retweets **664** Likes



202 40 664

Tweet your reply

matthew naico @MatthewNaico · Feb 10
Replying to @marchimark @AlishaNico @Rialisms
Someone needs to chill and memeber this isn't Salem 1692

This media may contain sensitive material. Your media settings are configured to warn you when media may be sensitive. **View**

2 37

Mr. Pickle @kurogale · Feb 9
Replying to @marchimark @AlishaNico @Rialisms
What is she on about?

2 1 18

matthew naico @MatthewNaico · Feb 10
Witch hunt mostly

Copy from re:SearchTX

Jamie Marchi
@marchimark

Follow

I stand with the victims. My experience is minor in comparison to many others; however, having realized this wasn't an isolated incident, I felt compelled to share.

Several years ago, I was in the lobby at my job when I was approached by a co-worker. This guy gave me the creeps already (he gave almost all the women at my job the creeps), but I always felt like I had to be nice to him anyway because of how revered he was in the industry. As we said hello, he stood to the side of me and started running his fingers through my hair. Now, I do work in an affectionate industry; we hug a lot, and on occasion, will give a kiss on the cheek. But even for an affectionate environment, this felt off. I didn't say anything to him about it, though. It was just his fingers in my hair; I didn't think it was a big deal. At that point, he splayed his fingers, put his hand at the base of my skull, and made a fist. When he did this, he grabbed my hair close to the root, effectively preventing me from moving my head at all. He then jerked his fist, yanking my head backwards and towards him, and whispered something in my ear. I don't remember what he said specifically, but I do remember it being sexual in nature. This was not normal. This was not just a hug or a kiss on the cheek. I did not like it. I have no memory of getting out of his grasp, but I assume, "What the fuck are you doing?" was part of my technique.

3:50 PM - 8 Feb 2019

1,332 Retweets **5,003** Likes

631 1.3K 5.0K

Tweet your reply

Shannon McCormick @sadogre · Feb 8
Replying to @marchimark
Got yr back
99

Justin Briner @justinbriner · Feb 8
Replying to @marchimark
Thank you for your courage. You inspire me to be stronger. ❤️
12 9 618

1 more reply

J Michael Tatum @JMichaelTatum · Feb 8

Copy from re:SearchTX

@NickRekieta is lying and people shouldn't believe him.

1 2

Jamie Marchi
@marchimark

Follow

Replying to @GamingArmyx @JmgGarriga15 @DosWarrior

Well, he's saying I'm lying, and I know that I'm telling the truth... which means he's lying... so I am, in fact, justified in saying he's lying and people shouldn't believe him.

1:42 PM - 5 Mar 2019

1 Like

3 1

Tweet your reply

Supermarioultra @supermar1oultra · 44m

Replying to @marchimark @GamingArmyx @JmgGarriga15

1 2

Jamie Marchi @marchimark · 39m

I love the cyber attack spin... You know, the one you're using on my page.. while harassing me... while mocking me.. to try and prove that I'm harassing people..

1 3

Copy from re:SearchTX

Is This the End of the Sh*tty Media Men Lawsuit?
Moira Donegan's legal team has served another motion to dismiss Stephen Elliott's defamation claim.
thecut.com

25 18 84

Phenomenal_BITW @BitwPhenomenal · May 8
Let me know how your defamation suit goes.

3 1 34

Jamie Marchi @marchimark · May 9
Let me know how sixth grade goes next year.

9 1 10

Weebus The Gangsta Weeaboo @WeebusChrist · May 9
Hope Funimation pays you well, because that payout to Vic is gonna be huge.

3 1 20

Nick @nsm0220 · May 10
Can you guys just leave Jamie alone about the Vic incident please she's already been traumatized enough as it is

5 2

Jamie Marchi
@marchimark
Following

Replying to @nsm0220 @WeebusChrist @BitwPhenomenal

I appreciate the support, but I am far from traumatized. I have an incredible life and consider myself immensely blessed to have such a wonderful career and supportive group of friends and family. Cockroaches will be cockroaches, but they have no power over me.

7:50 AM - 13 May 2019

17 Likes

Copy from re:SearchTX

Proof has come up of a private discord server showing Civil Conspiracy

2 1

Shane Holmberg @shane_holmberg · 14h
For civil conspiracy one of the other defendants would have to be a member of it.

1 7

Kermit the God @KermTheUltimate · 14h
I can get the screenshots quickly. It showed all the people in it some of them being Defendants.

1

Shane Holmberg @shane_holmberg · 14h
In that discord only one of the defendants was a member. So much for civil conspiracy.

3 6

AMVAlchemist61 @AMVAlchemist61 · 12h
By that "logic" suing for civil conspiracy in a lawsuit with only 1 defendant is impossible.
It doesn't matter who any of the defendants conspired with to further a tort for there to be Civil conspiracy, only that they conspired with 1 or more other people to further a tort.

1

Shane Holmberg @shane_holmberg · 12h
Exactly you would have to proof that one member conspired with someone else. Which you can't. They can't even link that defendant to the Funi investigation. It is one big fishing expedition from those who claim to hate witch hunts.

1 7

AMVAlchemist61 @AMVAlchemist61 · 11h
So there were NO OTHER members of that discord server other than Jamie? Because if there was 1 other person in it that she was conspiring with to further a tort involving Vic, She committed civil conspiracy.

1

Shane Holmberg @shane_holmberg · 11h
By your logic two people on Twitter talking about Vic and how he shouldnt be allowed at cons would be civil conspiracy.

3 13

Jamie Marchi @MyHairIsFullOfSe...
@marchimark
Following

Replying to @shane_holmberg @AMVAlchemist61 and 9 others

Me: How does one further a tort?
Jack: You gotta encourage it with a little piece of lettuce.

9:19 PM - 17 Jun 2019

15 Likes

1 15

Copy from re:SearchTX

Exhibit H

Copy from re:SearchTX

Jamie Marchi ✓
@marchimark

I hold no malice toward anyone. I just love my work and the fans, and sincerely wish to continue.

Feb 23, 2019, 3:11 AM ✓

Ah, the friend that set up the account is the black face lawyer. Still never says what he's going to do with those lawyers, so it seems odd that everyone thinks he'd risk taking us to court. We're fine with it, though.

Feb 23, 2019, 3:12 AM

Jamie.....Why would someone get a lawyer if they wasn't going to sue 😂😂😂

Feb 23, 2019, 3:13 AM ✓

Also everybody says your this crazy psychopath you're simply one of those people with a twisted sense of humour right?

Feb 23, 2019, 3:14 AM ✓

1. Many reasons. He just bought a house ($500k from what I've heard), and he might want to adjust some estate information. He might want to put some of his money in an account with his mother to avoid losing anything if he ends up getting sued. He may need to change a will. He may have tax debts he wants to settle. He might want to protect himself if anyone goes after the YouTubers for slander. There are a TON of reasons someone would get a lawyer that would have nothing whatsoever to do with suing someone.

Feb 23, 2019, 3:18 AM

2. Yes, I have a twisted sense of humor, but that is not why people are calling me a psychopath. When a woman is angry, emotional, strong, independent, impactful, and uses strong words... a lot of people dismiss her humanity by calling her a psycho. It's been happening for eons.

Feb 23, 2019, 3:19 AM

Copy from reSearchTX

Jamie Marchi ✓

@marchimark

if you are not and you are in the right I will be the first one to apologise to you

Feb 22, 2019, 12:15 AM ✓

Jamie this is going to sound like a offensive question but it's genuine. Give me a reason to believe what you say is true.....

Feb 22, 2019, 12:16 AM ✓

Literally no other VA is supporting him. I have hundreds of them supporting me. People don't like me because I'm TOO honest. I say what I mean. I give no fucks. I don't lie; I don't even exaggerate. I certainly do not have a 15+ year history of harassment (rumored or otherwise). I have never lied to someone about who I was and what I was doing for 12 years. I have never risked my loved one's lives by having too many affairs to remember them all. I have never cheated on anyone in my life. I believe love is love. I would die for my friends. I have a resume that shows I have no reason to be jealous of anyone. I have pink stripes in my hair, which is just fucking cute. I have pets because I can't not have something to love at all times. My friends would tell you I'm ride or die. I have a professional and positive reputation with conventions. Some people think I'm a bitch because I tell the truth too much. No one thinks I'm a diva and treat people poorly. I've never yelled at anyone until they cried, much less a pregnant woman. I never pretended to be anyone other than the person I am. Alt right 'men' hate me because I'm strong and independent and give no fucks what they think. I don't give in to bullying. I've been open on my DMs to talk to people, even those that try to spin my conversations into something negative. I stand by everything I've said. I am not hiding. I am not afraid because I know I am telling the truth. I am not holding a fundraiser for legal fees. I do not own two homes and still ask fans to pay my bills. I have not convinced my fans or anyone else that I am anyone other than I am. I have played nice in front of cameras and panels in order to make sure the fans can have a great time and not feel awkward - because that is the professional thing to do. I came forward to support other people who have been through the same thing. I came forward to warn people to keep their distance. I am also Italian and know the difference between consent and assault... That's just a start, but like I said, I'm a little busy.

Feb 22, 2019, 12:34 AM

Copy from re:SearchTX

Exhibit I

Copy from re:SearchTX

NO. 141-307474-19

VICTOR MIGNOGNA,	)	IN THE DISTRICT COURT
	)	
Plaintiff,	)	
	)	
VS.	)	TARRANT COUNTY, TEXAS
	)	
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE,	)	
	)	
Defendants.	)	141st JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF

MONICA RIAL

JUNE 28, 2019

ORAL AND VIDEOTAPED DEPOSITION OF MONICA RIAL, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on June 28, 2019, from 8:50 a.m. to 12:29 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Job No. 132315

DEPOSITION OF MONICA RIAL
June 28, 2019

A P P E A R A N C E S

FOR THE PLAINTIFF:
Ms. Carey-Elisa Christie, Esq.
Mr. Ty Beard, Esq.
BEARD HARRIS BULLOCK HUGHES, PC
100 Independence Place
Suite 101
Tyler, Texas 75703
(903) 509-4900
ty@beardandharris.com
carey@beardandharris.com

FOR THE DEFENDANTS RONALD TOYE and MONICA RIAL:
Mr. Casey S. Erick, Esq.
COWLES & THOMPSON
901 Main Street
Suite 3900
Dallas, Texas 75202
(214) 672-2000
cerick@cowlesthompson.com

FOR THE DEFENDANT FUNIMATION PRODUCTIONS:
Mr. John Volney, Esq.
LYNN PINKER COX & HURST, LLP
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
(214) 981-3839
jvolney@lynnllp.com

FOR THE DEFENDANT JAMIE MARCHI:
Mr. Sam Johnson, Esq.
JOHNSON SPARKS
7161 Bishop Road
Suite 220
Plano, Texas 75024
(972) 918-5274
sam@johnsonsparks.com

FOR THE VIDEOGRAPHER:
Mr. John Franks

ALSO PRESENT:
Mr. Ronald Toye

DEPOSITION OF MONICA RIAL
June 28, 2019

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REQUESTED DOCUMENTS/INFORMATION

NO.	DESCRIPTION	PAGE
NONE		

CERTIFIED QUESTIONS

NO.	PAGE/LINE
NONE	

*XXXX identifies redacted names in the transcript per confidentiality stipulation

DEPOSITION OF MONICA RIAL
June 28, 2019

THE VIDEOGRAPHER: And we're going on the record in the videotaped deposition of Monica Rial. Today's date is June 28, 2019. The time is approximately 8:50 a.m.

At this time will counsel please state their appearances for the record and then the court reporter will swear in the witness.

MS. CHRISTIE: Carey Christie for the Plaintiff Victor Mignogna.

MR. BEARD: Ty Beard for the Plaintiff Vic Mignogna.

MR. ERICK: Casey Erick for Defendants Monica Rial and Ron Toye.

MR. JOHNSON: Sam Johnson for Defendant Jamie Marchi.

MR. VOLNEY: John Volney for Funimation.

MS. CHRISTIE: And, gentlemen, are you going to do the same as yesterday with the one-person objections?

MR. ERICK: Yes.

MS. CHRISTIE: And then the confidentiality that we had?

MR. ERICK: Correct.

MR. JOHNSON: Yes.

MR. VOLNEY: Yes.

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MS. CHRISTIE: Thank you.
(Oath administered.)
THE REPORTER: This will be taken under the Texas Rules of Civil Procedure?
MS. CHRISTIE: Yes.
And, Casey, would you like to have her read and sign?
MR. ERICK: Yes, I would. Thank you.

MONICA RIAL,

having been first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MS. CHRISTIE:

Q. Hello. How are you today?

A. Good. How are you?

Q. I'm Carey Christie. I'm one of Vic Mignogna's attorneys. Sorry. I have a hard time with his last name.

A. A lot of people do.

Q. So is it okay if I just say Vic throughout because --

A. That's fine.

Q. Okay.

A. I get it.

Q. And -- and what would you like me -- how would you like me to address you? Can we say Monica or --

A. Oh, sure.

Q. -- Ms. Rial?

A. Sorry. I keep stepping over.
Uh, Monica is fine.

Q. Okay. Thank you. Thank you, Monica.
I'm going to go through a few little preliminary matters before we start. I believe you were in the room yesterday and kind of saw how that worked.
Have you ever been -- or -- or participated in a deposition before?

A. Yes, ma'am.

Q. Okay. And what was that for?

A. It was for black mold in our apartment.

Q. So today I'm just going to be kinda asking you some questions related to the lawsuit. If you don't understand or you need me to clarify a question, please feel free to do so. If you -- if -- if -- and -- and we need to make sure that we won't talk over each other so that the court reporter has a clear record.
If there are any objections made, we'll make sure to make those objections after you have completed what you were saying. Make sure to listen to the questions so that the answers are following the questions. And if you need to take a break, if there's been a question asked, let's just make sure that we

finish the answer to that question before we move on.
Are there any -- and do you understand all of -- everything --

A. Yes, ma'am.

Q. -- that I just explained to you?
Are there any health-related issues preventing you from testifying fully and truthfully today?

A. No, ma'am.

Q. And are you taking any medications that affect your memory or ability to testify today?

A. No, ma'am.

Q. Okay. And when you were getting ready to prepare for this deposition, did you meet with your attorney?

A. We didn't meet. I had a phone call just to talk about what it was that I was going through, because they didn't realize I had been through a deposition before.

Q. Okay. And have you met with any of the other witnesses in this case?

A. No.

Q. When you were on that phone call, was there any way to review any documents?

A. No.

Q. Was there anyone else present on that phone call besides you and your attorneys?

A. No, ma'am.

Q. Was there anyone else in the room?

A. No, ma'am.

Q. Okay. Can you please state your full name for the record.

A. It is Monica Jean Rial.
I hate my middle name.

Q. It's my aunt's middle name.

A. I guess it's just one of those that gets passed down.

Q. What is your current address?

A. It is 614 Ridgedale Drive, R-I-D-G-E-D-A-L-E, Richardson, Texas, 75080.

Q. And how long have you lived at that residence?

A. I believe it's been about three years now.

Q. What is -- what is your educational level?

A. I have some college. I got very close to finishing.

Q. Have you ever been arrested?

A. No, ma'am.

Q. Okay. And you had indicated, when I had asked you about taking a deposition before, that there was a lawsuit for black mold?

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A. Yes, ma'am.
Q. Have you participated in any other lawsuits?
A. No, ma'am.
Q. Have you been married before?
A. No, ma'am.
Q. Has there been a history of drug or alcohol use?
A. No, ma'am.
Q. Do you smoke?
A. Nope.
Q. And what is your current employment?
A. I am currently a voice actress for commercial anime and video games.
Q. Do you have contracts with any studios currently?
A. Well, Funimation does yearly contracts. Sentai, another studio I work for, does contract by the project. So for that studio, no; for Funimation, yes, I'm under their yearly contract.
Q. And how long have you been a voice actress?
A. For 20 years.
Q. And how are you typically paid for this type of work?
A. Well, it's contract work, so I'm paid by the contract. It's usually 1099. Yeah. And it depends,

sometimes it goes through my agency and sometimes it comes directly to me, dependent upon where I'm working.
Q. You have an agent?
A. A talent agent, yes.
Q. A talent agent. And what's the name of your talent agent?
A. It's the Mary Collins Agency, but I work specifically with Kim Trusty; it's T-R-U-S-T-Y.
I'm trying to help you out when I can.
Q. And do you attend conventions, also?
A. Yes, ma'am.
Q. And when you're at the conventions, how are you paid for those?
A. Well, it depends on if it is a -- sorry, there's so many depends. It depends on whether I'm appearing for a fee, sometimes they pay us an appearance fee up front that would go through my agent. Or if it's more of like a pop culture Comic Con, then we're paid by guarantee; so it's basically you sell your wares, and then if you don't make the guaranteed amount, then they will pay you whatever the difference is.
Q. And is that generally done with cash or a credit card?
A. Again, it depends.
Q. Depends.

A. For -- I use credit card, because I file everything on my taxes, but I know a lot of people avoid the credit cards because they are maybe not as honest.
Q. Do you have any type of religious affiliation?
A. No, ma'am. I'm agnostic, but I was raised Southern Baptist and Roman Catholic, which is probably why I'm agnostic.
Q. That would make sense.
A. Yeah. It's very -- two very -- very different places.
Q. Well, if I may say, I'm Southern Baptist and my ex-husband is Catholic, so there you go.
A. So you get it. You understand.
Q. Do you have a Twitter handle name?
A. Yes, ma'am.
Q. Or a name? Do you -- can you tell me what that is off the top of your head.
A. Yes. It is @rialisms, R-I-A-L-I-S-M-S.
Q. And are you the only person that uses that account?
A. No, ma'am.
Q. Who uses that account in addition to yourself?
A. My assistant, Ame Howard. And that's A-M-E, Howard. She posts on occasion for me.
Q. How frequently would you say she posts?

A. Relatively infrequently. Maybe once a month, if that.
Q. Okay. Have you received any notice since maybe November of 2018 that your account has been hacked in any way?
A. No, ma'am.
Q. And have you posted or tweeted -- these terms are kind of -- kind of escape me. Have you posted or discussed or twitted, tweetered, twitted, however you say that, about Vic on -- on Twitter since January of this year?
A. I can't recall. There's been so many tweets.
Q. Did you -- but did you post something that kind of discussed what had occurred between you and he?
A. I know that I posted something at some point, I just don't remember the specific dates.
Q. And have you provided all of those tweets that might have referenced Vic to your attorney?
A. Yes, ma'am.
Q. And have you -- do you recall discussing the Funimation investigation on Twitter?
A. I recall mentioning it after they made their announcement that there was an investigation.
Sorry. My allergies are awful today y'all.
MR. ERICK: You're good.

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THE WITNESS: I'm snotty.

Q. (BY MS. CHRISTIE) And was that when you commented on the -- I believe the post was on either February 10th or 11th of this year that -- was there -- did you comment when they post -- when Funimation posted; do you recall that?

A. Oh, yeah. I believe -- I didn't realize at the time, I don't think, that I was replying to that comment, cuz Twitter, the way it comes at you, it's hard to tell.

Q. Tell.

A. But, yeah, I believe it was under that --

Q. That -- that thread?

A. That thread, yes.

Q. Was it within that thread?

Do you have any other social media accounts?

A. Yes, ma'am.

Q. What other accounts do you have?

A. I have a Facebook account. I have an Instagram account. I have a LinkedIn that I haven't checked in probably three years. And I have a Snapchat account, but I only use it for the filters, as much as I hate to admit that.

Q. That seems to be the normal course for most

people that use it.

A. LinkedIn, I feel bad. I get all the notifications and --

Q. Okay. And do you recall if you've posted or discussed anything about Vic on any of these other social media sites?

A. I don't recall.

Q. Is it possible that you could have?

A. The only place that I can think of that I would have possibly said anything about the situation at all is, there is a Facebook fan club, and I was starting to get questions there, so --

Q. And is the Facebook fan club for you?

A. Yes.

Q. Okay. And have you provided that to your attorney?

A. I -- I think I was only asked to provide emails, so I didn't even think to add that to it.

Q. Okay.

A. And if it was anything, it was usually just directing people to Twitter.

Q. Okay. Would you be agreeable to checking that and providing that to your attorney?

A. Sure. I believe it's public access, too. Like, I think it's open to the public.

Q. Okay. And have you -- through the course of this, I believe there's been a lot of tweets, and have you deleted anything from your Twitter account or Facebook?

A. No, ma'am. The only instances I can think of that I've ever deleted anything on Twitter is because there's not an edit button, so usually it's a, I write a tweet, there's a typo, I re-write it. But I think that just happened once or twice in my entirety on Twitter.

Q. How long have you been on Twitter; can you recall?

A. I -- I can't recall. It's been a few years, at least.

Q. And do you recall the date that you retained your attorney?

A. I don't recall. I'm sorry. There was so much going on at that time.

Q. Okay. Could it have been early February?

A. It could have been early February. It could have been earlier than that. I honestly don't recall.

Q. And can you tell us how much you've paid your attorney thus far?

A. Up till now, I am not 100 percent sure.

Q. Okay. Do you believe it to be more than 10,000?

A. Yes.

Q. Okay. Is it more than 20,000?

A. I don't know. I'm sorry. It's been in increments.

Q. But it hasn't been, like, $50,000?

A. No.

Q. Okay. And who is paying for your attorney?

A. Me.

Q. So Funimation's not paying any legal?

A. No, ma'am.

Q. And is Chris Sabat paying anything?

A. No, ma'am.

Q. Okay. And with regard to this, the current pending litigation, have you discussed this on Twitter in any way?

A. Discussed?

Q. Discussed about the litigation.

A. Not that I can recall. I've tried to be very quiet about everything.

Q. And have you discussed it on your Facebook fan page in any way?

A. No.

Q. Sorry. I have a script.

A. No, it's okay. I'm an actress. I totally get having a script. You have to be prepared.

Copy from re:SearchTX

Q. It's because of the squirrel. I have to do that.

Have you discussed this litigation with anyone other than your attorneys?

A. No, besides Ron.

Q. Have you spoken to Jamie Marchi about it?

A. Yes. I believe -- yes, we have discussed it.

Q. Have you -- and you haven't discussed it with Chris Sabat or -- or Sean Schemmel or --

A. Other than being aware that it is a thing that exists.

Q. And you had indicated to me earlier that -- that you've been a voice actress for about 20 years.

A. (Witness nods.)

Q. So -- so that would put the year that you started doing this at about 1999?

A. Yes, ma'am.

Q. And how -- how did you get into the industry?

A. I have been an actor since I was 12. I was going to the University of Houston, and one of my colleagues -- I did a lot of Shakespeare -- and one of my colleagues, Jason Douglas, was doing this show with me, and he said, Hey, I'm working on this stuff here in Houston and it's all about kids saving the world, and you sound like a child so you would be really great at

it.

And despite the backhanded compliment, I asked for the phone number and I called them. And they just happened -- it was ADV Films in Houston, and they just happened to be having auditions that weekend. So I auditioned, and about six months later, something like -- it was a long time, they called me and they asked me to come in, and I've been working ever since.

Q. Okay. Do you recall the first character you ever voiced?

A. Yes, ma'am.

Q. What -- what was that character?

A. It was a show called Martian Successor Nadesico -- okay. Martian Successor Nadesico, and I played a small character named Mikako, M-I-K-A-K-O.

Q. What character did you voice in Super Broly?

A. Oh, in Dragon Ball Super: Broly?

Q. Yes.

A. I voiced Bulma.

Q. And is it okay if I just say Super Broly or Super Broly --

A. Yes. Sorry.

Q. -- because that's a long name?

A. Yeah.

Q. Or if you prefer me to say Dragon Ball, then I

can do that.

A. Dragon Ball might be easier.

Q. Okay.

A. Just cuz that's what pops in my head first.

Q. Do you have an IMDb page?

A. Yes, ma'am.

Q. Off the top of your head, do you know approximately how many roles are showing on that page?

A. I don't know about IMDb in particular, but I know that I am up to between 550 and 600 roles.

Q. And what's your favorite character you've ever voiced?

A. This is going to sound awful. I get this question a lot, and I always tell them that I can't pick because I get to play what are called -- what we affectionately term best girls in anime. So I get to play all of the fun, complex characters that, you know, are just more exciting to play as an actor, so -- it's hard for me to pick one.

Q. And is being a voice actress your main source of income?

A. Yes, ma'am.

Q. And how do you -- how do you track the income that you receive? Do you have an accountant?

A. Oh, yes, I have an accountant.

Q. Okay. And do you get paid in any way to do press for something like Dragon Ball?

A. No. Press is usually included in whatever fee you're paid to show up.

Q. And did you do press for the Dragon Ball movie?

A. For the latest movie?

Q. Yes, ma'am.

A. Yes, ma'am.

Q. What time frame was that?

A. It was -- it was around the premier in L.A, so it would have been around the December 13th time period. I believe it was December 13th.

Q. And do you do press for just one day, or is it over an extended period of time?

A. It depends on the title, but for this one it was several days of press.

Q. Was that because this was an anticipated movie?

A. I think it was more because there were a group of fans, so we did one day was the professional interviews with, like, the bloggers and things like that, and then one day was just fan interviews.

Q. Okay. And you had indicated that you play characters that are the best girls. Are those -- are those characters normally strong?

A. Some of them. When you've got that many it's

Copy from re:SearchTX

hard to narrow it down. Yes, some of them are very strong women, but it's anime so some are not strong. They're just -- I run the gamut, I guess.

Q. And do you identify with these best girl strong characters?

A. As an actor it's your job to identify with your character. You kind of have to put a little bit of yourself and take a little bit of them with you, if that makes sense.

I know I don't want to get too crunchy granola on you guys.

Q. It's okay. I lived in Colorado, it's okay.

A. Oh, so you get it. You're familiar with the granola.

Q. Yes. And you had -- you had stated that you had gone -- you had attended the University of Houston. Do you have family there?

A. In Houston?

Q. Yes, ma'am.

A. Yes, ma'am.

Q. Okay. Is that where most of your family is located?

A. Yes, ma'am, in Houston and Spain.

Q. Oh, wow, Spain.

A. Yeah, it's very different, hence the Southern

Baptist and the Roman Catholic.

Q. And are you close with your family?

A. Yes, ma'am.

Q. Do you have any siblings?

A. Yes, ma'am.

Q. Okay. And are you close with your siblings --

A. Yes.

Q. -- as well?

A. Very much so.

Q. And do you -- I believe I understand that -- that you and Ron are engaged?

A. Yes, ma'am.

Q. Is that correct?

And how long have you been dating?

A. Five years in -- next weekend. Sorry. I totally forgot.

Q. How long have you been engaged?

A. We've been engaged, I believe it's been two years. I believe it's been two years, yes. Sorry. It's hard to remember.

Q. And do the two of you live together?

A. Yes, ma'am.

Q. Do you tend to tell each other everything?

A. Yes. I believe that's what makes a good partnership.

Q. And who are your closest voice actor friends, would you say?

A. Oh, gosh, close as in like hang around with constantly?

Q. Yes.

A. Okay. Closest, best, goodness, Jamie Marchi, Colleen Clinkenbeard, Chris Sabat, Anne Sinclair, Josh Grelle. Gosh, there's so many. I'm trying to go through everybody. J. Michael Tatum, Brandon McInnis.

Q. And these are people, do they live in the Dallas-Fort Worth area?

A. Yes, ma'am.

MR. ERICK: Can we take a quick break? I just need to make one phone call, super quick.

MS. CHRISTIE: Yes. Sure.

THE VIDEOGRAPHER: We're going off the record at 9:14.

(Break taken from 9:14 a.m. to 9:25 a.m.)

THE VIDEOGRAPHER: And we are back on the record. The time is 9:25.

Q. (BY MS. CHRISTIE) Monica, you had mentioned earlier that you have a contract with Funimation that's running through the year.

A. Yes, ma'am.

Q. Okay. And you are a voice actress for them on

a contractual basis?

A. Yes, ma'am.

Q. How often are you at the -- at the offices or the studios?

A. It's dependent upon a multiple of different factors. We keep up with the Japanese television schedule so we do what are called simul dubs, and that means that every three months we have a new group of shows. So it could be that for the first quarter you're there six hours a week, and then it could be for the second quarter you're there for 20 hours a week, and -- but recently, I haven't had as much, so it's been like maybe three or four hours a week.

Q. Do you do any recordings remotely for Funimation?

A. For Funimation, no.

Q. And would you say the work environment at Funimation is -- what would you say about the work environment?

A. I'd say it's professional, but friendly. People are very happy and say hi to one another, and --

Q. Does any -- when people greet each other, or have you noticed when people greet each other, that they kiss each other on the cheek or hug each other?

A. There -- it used to be the case a long time

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ago, but I know that in recent years, no, that is frowned upon.

Q. And who frowns upon that?

A. Management. I'm not sure who management is, but the people upstairs.

Q. Okay. And to your knowledge, are there any people that are currently dating each other that work there?

A. I -- you mean two employees together?

Q. Uh-huh.

A. I -- I wouldn't know.

Q. Who is Trina Simon?

A. Oh, she is the HR head of Funimation, or the HR lady at Funimation.

Q. Are there any written policies for Funimation that you receive?

A. I don't quite understand. What do you mean by written policies?

Q. So like -- like an employee manual or -- or anything that kind of tells you what they expect of you.

A. If there was, I would have received it when I started, so I surely don't have that anymore. But they do have -- there are post -- posted things all over the building explaining different policies and where to exit if there's an emergency, that kind of stuff.

Q. Have you -- do you recall seeing any policies about behavior of the voice actors or how they're expected to behave?

A. I'm sure there are, but I don't recall any particular example.

Q. How long have you been doing work for Funimation?

A. I started working with Funimation in 2003.

Q. And who is Lisa Gibson?

A. Lisa Gibson is -- forgive me. I'm not even sure what her title is now, but she works at Funimation.

Q. Who is Colleen Clinkenbeard?

A. Colleen Clinkenbeard is a voice actress director, and she is currently, I believe, in charge of video extras at Funimation.

Q. Do you generally -- because I'm trying to understand this, do you generally record alone?

A. You mean individually?

Q. Yes.

A. Yes, we record individually unless it is what is called a walla session, and then you have a small group of actors come in.

Q. How often would you say you have a walla session?

A. Me, myself?

Q. Yes, ma'am.

A. Very infrequently. They tend not to use some of what they call the veteran actors in walla because there's a lot of new people that come in. They like to take pictures and waste time.

Q. Can you recall who you have spoken with at Funimation, that are employees of Funimation, about Vic?

A. About this particular --

Q. (Attorney nods.)

MR. VOLNEY: Objection, form.

A. Who have I spoken to? I know I've spoken to Colleen. I know I've spoken to Trina. I have spoken to Lisa Gibson. I've spoken to Karen Mika and Justin Cook.

Q. (BY MS. CHRISTIE) Did you also speak with a person named Tammi Denbow from Sony?

A. Yes.

Q. Can you recall the approximate time range, date range, when you were discussing Vic with these people at Funimation?

A. Well, with Tammy, it was earlier on, I don't recall exactly, but it was earlier on as part of their investigation. The others I spoke to much later on, because it was as a result of the harassment that I was receiving online.

Q. And by early on in the investigation, was --

was that around the January 15th, 16th time frame?

A. I know it was sometime in January, but I don't remember exact dates at all. Sorry.

Q. And prior to January of 2019, had you spoken to anyone at Funimation about Vic?

A. About Vic in particular, about anything about Vic, or I --

Q. Or just about -- about these allegations that have been made.

A. No.

Q. Did you -- were you under that yearly contract with Funimation in January of this year?

A. Yes.

Q. You have -- you have mentioned the investigation in some of my previous questions.

Who from Funimation contacted you?

A. From Funimation?

Q. Yes.

A. Nobody -- it depends on if you're considering Tammi Denbow being Sony, a part of Funimation, then Tammi.

Excuse me.

Q. Did she just contact you out of the blue?

A. No. I had contacted Colleen Clinkenbeard and said that I needed to talk to her, or talk to someone,

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and she gave me -- she said she would pass the information along. And then that's when Tammi reached out to me.

Q. When you had communication with Tammi was it -- was it mostly email or did you also speak on the phone?

A. It was mostly on the phone.

Q. Did you exchange emails with Tammi Denbow?

A. Yes, ma'am.

Q. Have you provided those to your attorney?

A. Yes, ma'am.

Q. And when you had discussions with Tammi Denbow about Vic, did you relate your -- your story to her?

A. Yes, ma'am.

Q. Can you recall the specifics of what you related to her about yourself?

A. Well, I related to her that I went to a convention called Izumicon in 2007, that Vic and I were both guests there, that we -- the whole weekend I had spent flirting with a gentleman named Rawly Pickens, and Vic would come and join us on occasion and kind of didn't get the -- didn't seem to realize that we were doing our little flirting thing. And Sunday, when they all left, Stan Dahlin, the convention chair, had said, you know, we're going to all go out to dinner with the staff and we'd like for you guys to go, and we agreed.

And then Vic said, Hey, can you come by my hotel room? There's something I want to show you. And I can't recall exact -- I think it was the Full Metal Fantasy film that he had done, his fan film.

And so I went to his hotel room, because, like I said, I had been flirting with Rawly all weekend and he was dating a friend of mine named Michele Specht. So I went with him to the hotel room. He played for me, the video, and in the middle of the video he grabbed me by the arms and he turned me around and he started kissing me. And -- sorry. And I was --

Q. It's okay.

A. -- I was raped when I was 15 years old, and so for me it was -- it was a very difficult moment. I was frightened. I was scared. I didn't know what to do.

When I was 15, I had fought back, and that didn't end well for me. So I just kind of went along with it, knowing that Stan -- any minute Stan was going to come to the door. And he kept kissing me and kind of pushed me back onto the bed and actually got on top of me, and I still have like a very visual -- like a nightmare, actually, that -- that feeling of looking at the door and thinking how do I get out of this, like, how -- how do I -- how do I get out of there without ruining the friendship that we'd had, the trust that we

had built, and then Stan came to the door. And when Stan came to the door, he jumped up and ran to the door, and I kind of covered my face. Because being pale, if -- if anything is happening, you can see it all over my face.

Stan came in. He asked me, as we were leaving, you know, Are you okay? I said Oh, yeah, yeah, I'm fine, and just kind of kept covering my face.

And we went to dinner. I don't recall where we went or what was spoken about, because I think I was in shock the whole time. And when we came back, he went out -- outside of his room there was this little patio, and he was standing on the patio and he called Michele. And he -- he put me on the phone with Michele, and that was hard for me, because she was a friend of mine. And I remember that being the moment I talked to Michele, I said good night, and then I went to my room and -- and that was it.

Q. I know this is hard for you.

A. It's gotten easier, the more you have to tell it, but it still sucks, it still sucks big time.

Q. So you related that story to Tammi Denbow?

A. Yes, ma'am.

Q. Okay. And what -- was there some mention of a -- of a jelly bean incident?

A. I did mention -- she asked about other instances of sexual harassment. Excuse me. I'm sorry. My allergies are --

Q. It's okay.

A. I'm so incredibly dried up.

She asked of other cases of -- or examples of sexual harassment. And so, yeah, I mentioned the jelly bean incident, I mentioned the hair pulling, I mentioned the kisses and the speaking in the ear when he's hugging you where it's basically his lips are touching your ear. I mentioned the names, you know, like the different pet names and stuff like that, that I felt were a little condescending, things like that.

Q. If I may ask, what were the pet names?

A. You know, honey, baby, sweet cheeks, you know, silly little things like that that, dependent upon delivery, can be very condescending and uncomfortable.

Q. Now, we live in Texas --

A. True.

Q. -- and a lot of men will call women honey and sweetie.

A. True.

Q. Was there a difference in the way it was said?

A. The delivery, a lot of times it was said with, you know, hands running through hair or touching the

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face, or sometimes it was whispered in the ear. So, yeah, the delivery is what made it feel -- it wasn't just, you know, your high school coach going, you know, Buck up, Sweetie, it was -- it was a totally different delivery.

Q. With regard to the jelly bean incident, do you recall, kind of, the date range of that?

A. I don't recall the date range, no.

Q. Would you say it was 10 years ago or --

A. It was more than 10 years ago. Probably more like 15 years ago.

Q. Do you recall what city you were in?

A. No, ma'am.

Q. Was this at a convention?

A. Yes, ma'am.

Q. When this occurred, who was present in the room?

A. It was an autograph session, so next to me was Greg Ayres, another voice actor from Houston, and in front of us were just a bunch of -- of fans ranging in age.

Q. And -- and when this happened, did you laugh?

A. I laughed, kind of, but not a -- not a, 'Oh my gosh, that's humorous' laugh, more of a, 'I can't believe you just said that in front of these people.'

And also, the fact that when he delivered the, 'I just want to be able to say I ate Monica Rial,' again, it was the delivery. It wasn't like he just said it, he actually was touching my face and pulling me towards him when he said it.

Q. Did you tell anyone about the jelly bean incident prior to January of 2019?

A. I know that Greg and I had spoken about it once before, just going, Oh, you remember that weird thing that happened? But, no, I did not -- that was not something that I made common knowledge.

Q. Why did you bring it up now?

MR. ERICK: Objection, form.

A. Because she had asked for examples of sexual harassment. Sorry. Tammi had asked for examples.

MS. CHRISTIE: Okay. And this is a portion where there's going to be some confidentiality.

Q. (BY MS. CHRISTIE) Did XXXXX and XXXX XXXX ever work under a contract for Funimation?

A. No, ma'am.

Q. Okay. And in January of 2019, did XXXX XXXXXXXXX work for Funimation?

A. I don't recall when she left, but I know that she worked there until relatively recently.

Q. And who told either anyone at Funimation or at

Sony about the allegation that was made -- and may I please call them the XXXX twins, because XXXXX and XXXX, I get confused -- so by the XXXX twins?

A. I have no idea.

Q. It was not you?

A. Oh, no, ma'am.

Q. And who told Funimation or Tammi Denbow at Sony about the allegation that XXXX XXXXXXXXX had made?

A. I don't know.

Q. Okay. But it wasn't you?

A. No, ma'am. I mentioned it in the investigation, but I know that she was already aware.

Q. Was there ever any mention to you about how long the investigation had been going?

A. No, ma'am. I don't recall.

Q. I apologize. I take notes.

A. No, it's fine. I apologize for all my sniffling.

Q. It's okay.

Who do you know that participated in the investigation?

A. As far as I know, XXXXX XXXX and XXXX XXXX. And that's all I know that participated in that particular investigation.

Q. Speaking of that, has Funimation done any other

investigations about Vic, to your knowledge?

A. To my knowledge, I believe that there was one other in the past, but I only came to that knowledge through secondhand, another voice actor from L.A.

Q. Which voice actor?

A. Tara Jayne Sands.

Q. Do you recall the time frame of this prior investigation?

A. I wouldn't know.

Q. And I believe I've looked at a tweet, which we'll get into a little bit later, that -- that -- that had your Twitter handle, that indicated there were dozens of people that came forward. Is that an accurate statement?

MR. ERICK: Objection, form.

A. Over the years, I can't -- without looking at the tweet, I don't know exactly what I was referring to, but there have been more than just the one investigation by Funimation over the years, there's been quite a few.

Q. (BY MS. CHRISTIE) Do you know who did those investigations?

A. Not off the top of my head. There was one done by ADV Films back in the early 2000s, that was kind of a general sweeping sexual harassment investigation that I know that he was a part of. I don't know if they ever

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dealt with him or anything like that, but I know that he was investigated then.

Q. Was that the only one?

A. I know, of course, about Rooster Teeth; I don't know the specifics of that. I know Sentai, and I know a few conventions have kind of done their own investigations on him.

Q. Okay. Can you recall which conventions or --

A. No. I wouldn't have that information. I don't know off the top of my head.

Q. But up until January of this year, no one had taken any actions, that you're aware of, with regard to Vic?

MR. ERICK: Objection, form.

A. Well, I know that he's not allowed on the property at Sentai Filmworks.

Q. (BY MS. CHRISTIE) How do you spell that?

A. It's S-E-N-T-A-I, and then Filmworks is all one word.

Sorry, you guys, just whenever I throw out a Japanese name, let me know and I'll clarify.

Q. And with regard to the other investigation that you heard secondhand, that -- from Tara Jayne Sands that had been done, did you participate in any way in that investigation?

A. No, ma'am.

Q. Do you know if Vic participated?

A. I don't know.

Q. Did Ms. Sands indicate who had participated?

A. No, ma'am.

Q. Was she one of the participants?

A. No. I believe that she contacted them, that that was it.

Q. And -- and Vic was not terminated at that time?

A. No.

Q. And prior to 2019, were there a lot of rumors about Vic?

A. Yes, ma'am.

Q. With regard to the Dragon Ball Z movie, which I understand is like the third highest grossing movie, anime movie --

A. I believe --

Q. -- in U.S. history?

A. -- so. I know it did really well. I believe so.

Q. Did -- did any of the actors receive any residuals from that?

A. No.

Q. It was just a flat fee?

A. Just a flat fee. I can't speak for the others

though, I -- but I know I didn't.

I might have to beat somebody up if they did. No, I'm kidding.

Q. Did you -- did you request, at any point, that Broly be recast?

A. No.

Q. Did anyone else request that Broly be recast?

A. To be recast after the fact?

Q. Or during the making of the film.

A. No. I -- well, I know that -- I believe that the -- or the Japanese distributor wanted to cast a different voice because they used a different voice in the Japanese.

Q. Were there any voice actors that were calling for Vic to be replaced?

A. I wouldn't know.

Q. While you were doing press for Broly, or Broly, or Dragon Ball -- goodness -- on December 17th, 2018, at 8:15 p.m., did you respond to a tweet made by Vic about doing press for that movie?

MR. ERICK: Objection, form.

And if we're -- if we're going to -- I think you're going to do this later, but if we're going to make a talk about tweets, we should probably look at them, but --

MS. CHRISTIE: Yes.

MR. ERICK: Okay.

MS. CHRISTIE: I'm just asking.

MR. ERICK: Gotcha.

A. I wouldn't know without seeing it. I'm sorry. There was a lot of tweets happening this whole year.

Q. (BY MS. CHRISTIE) Okay. So if I were to hand you -- I'm sorry, I have a tab on it.

MS. CHRISTIE: And I apologize to everyone, I do not have copies.

MR. ERICK: Okay.

Q. (BY MS. CHRISTIE) I'm just going to hand this to you just to refresh your recollection.

A. Yes.

Q. Does that appear -- on this page, does that appear to be a picture of you and Vic, and is that Chris Sabat?

A. No.

Q. No.

A. That's Ian Sinclair.

Q. Okay.

A. And Sonny Strait.

Q. Okay.

A. And we were at a press event.

Q. Okay. And underneath this picture, does that

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appear to be your Twitter handle?

A. Yes, ma'am.

Q. Or your Twitter name?

A. Yes, ma'am.

Q. Okay. And in this, does -- does this -- does this appear to be a tweet that you made?

A. Yes.

Q. Okay. And do you think this would be something you would have done, you would have responded?

A. Yes.

Q. Okay. And in this -- in this tweet, does it state: It was so much fun, with a kissy face emoji?

A. Yes.

Q. And --

MR. ERICK: Why don't we make that an exhibit.

MS. CHRISTIE: Yeah.

(Exhibit 29 marked.)

MS. CHRISTIE: Would anyone like to look at the --

MR. JOHNSON: No thank you.

Q. (BY MS. CHRISTIE) Okay. With regard to Exhibit 29, why did you retreat -- tweet -- tweet this reply to Vic? Sorry.

A. Well, first of all, I use my Twitter

predominantly for my job.

Q. Okay.

A. So it's keeping appearances, making sure everybody knows that, Hey, we had a great time. So, yeah, it was basically just trying to make sure that everybody knew, Hey, we're all working together, everything's great.

Q. Do you have a personal Twitter that you use just between you and your friends?

A. No, ma'am. I try to avoid it when possible.

Q. And since -- since we kind of have a picture here of you and Vic, what year did you meet Vic?

A. It was -- I believe it was the year 2000.

Q. Okay. Was this in Houston?

A. Yes, ma'am.

Q. In what context did you meet him?

A. We were at an event for a show that I was the lead in, called Gasaraki, so I was -- I had to appear, and he came just -- I guess he was a very minor character, but I guess for support, kind of thing. And that was the first time that I had met him.

Q. Did you consider Vic to be a good friend?

A. Depends on the timeline, if that makes sense.

Q. So let's go into the timeline.

When did you decide that Vic was no longer

a good friend?

A. When he assaulted me.

Q. That would have been in 2007?

A. '07, uh-huh. November, I believe. I can't recall.

Q. And -- and in your opinion, just your opinion, what would you define a friend to be?

A. A friend is someone who you can trust inherently, and that you enjoy spending time with, and dependent on the -- the -- the -- the amount of friendship, can be almost like a family member.

Q. And prior to 2007, do you consider Vic to be like a family member?

A. Not like a family member.

Q. Okay.

A. Not that close.

Q. And in the early days, when you first started being a voice actress, were you a hairdresser?

A. Yes.

Q. Okay. And did you cut Vic's hair during that time?

A. Yes.

Q. And how long did you do that for?

A. I can't recall the exact dates, but I was a hairdresser for about 10 years, I believe.

Q. How long did you cut Vic's hair?

A. It was -- I think I've only done it once or twice. I used to go up to the studio and do what's called Monicuts, where I would just cut all the guys' hair. Still do on occasion.

Q. Okay. And how often -- prior to 2007, how often did you see Vic?

A. It's hard to say.

Q. Did you see him maybe once a month or once every two or three months?

A. I have no idea. It would depend on the workload that we had at the time and if I ran into him at the studio, but we do work individually and conventions, so I really, honestly, have no idea.

Q. And after 2007, how often do you think you saw him? Is -- was it the same --

A. No.

Q. -- kind of the same before?

A. It was -- it was less, quite a bit less.

Q. And how often did you take pictures with Vic?

A. I'm sure at conventions there are plenty of pictures of us together. Other than that, outside of work, I can't -- I -- I don't know.

Q. And if I were to tell you that I -- I -- that there was a video that I can't produce to you obviously

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in the context of a deposition, but there was a video when Vic was directing -- I believe directing a show for Funimation, and I believe you were one of the people that were working with him.

A. Yes, ma'am.

Q. And in that video, when you had finished, I believe you walked up and you hugged Vic.

A. Yes, ma'am. It was a work-related thing.

Q. But in the video you don't appear to be, like, (audible sound) with him or pushing back at him or -- sorry.

A. As I said in my statement that I had put on Twitter, I had chosen to forgive him for the one incident that we had in 2007, because I did consider him a good colleague, a friend, and I wanted to believe the best in him.

Q. Okay.

MR. BEARD: Oh, I'm sorry. Sorry for that.

Q. (BY MS. CHRISTIE) I'm sorry.

A. That's okay.

MS. CHRISTIE: We'll mark this Exhibit 30.

(Exhibit 30 marked.)

MS. CHRISTIE: And once again, I apologize for not having copies.

MR. ERICK: That's all right.

MS. CHRISTIE: I thought I did.

Q. (BY MS. CHRISTIE) Okay. I'm going to hand you what I've marked as Exhibit 30. What does this appear to be?

A. It appears to be a tweet from Funimation. Sorry.

MR. ERICK: Okay. Yep. Got it.

Q. (BY MS. CHRISTIE) And can you please turn to the second page for me.

A. Sure.

Q. And does this appear to be that -- that tweet from you in the thread?

A. The highlighted one?

Q. Yes, ma'am.

A. Yes, uh-huh.

Q. Okay. And does that appear to be your name on Twitter?

A. Yes.

Q. Okay. And would this have been something that you would have tweeted?

A. Yes.

Q. Okay. So this is your --

A. My Twitter.

Q. -- tweet? Okay. Okay.

This would not have been Ame Howard?

A. No.

Q. No. Okay.

And in this tweet, did you indicate that there were multiple investigations?

A. Yes, ma'am.

Q. And could you see -- and this is asking just for your opinion -- could you see where people could have interpreted that Funimation had done multiple investigations?

MR. ERICK: Objection, form.

A. I -- I don't know. It's hard for me to say what other people think.

Q. (BY MS. CHRISTIE) But if you had seen this as a fan, coming from you, would you have believed that Funimation had conducted multiple investigations?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MS. CHRISTIE) And what did you mean by multiple?

A. Multiple, when I was talking about multiple, I wasn't just discussing the Funimation investigation, I was discussing the other investigations over the years.

Q. So over the years would you say there'd been more than five investigations?

A. I wouldn't know exactly how many.

Q. Ten, twenty?

A. Sorry. I wouldn't know.

Q. And when -- were you and Vic representing Funimation in any way when the jelly bean incident occurred?

MR. ERICK: Objection, form.

A. I don't recall if we -- if I was even working at Funimation at that time. That's a long time ago.

Q. (BY MS. CHRISTIE) And were you and Vic repre -- representing Funimation in any way when he -- and -- and when I use the word allegedly, please understand that's because he's not been charged with any crimes, there's not been any convictions, so I use the word allegedly.

A. I understand.

Q. Okay. Were you and Vic representing Funimation when he allegedly assaulted you in 2007?

MR. ERICK: Objection, form.

A. We work as independent contractors for Funimation, but we do not represent Funimation, other than being a voice actor.

Q. (BY MS. CHRISTIE) So there were no ties with Funimation? I mean, like, there was nothing at that convention that represented that you were --

A. No.

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Q. -- con -- connected with Funimation?

MR. ERICK: Objection, form.

A. No. And I believe at that convention there was a push by ADV, actually, and not Funimation.

Q. (BY MS. CHRISTIE) Can you spell the name of that con you were at in 2007.

A. Izumicon. So it's I-Z-U-M-I-C-O-N.

(Exhibit 31 marked.)

Q. (BY MS. CHRISTIE) And I'm going to hand you what I've marked as Exhibit 31.

A. Sorry.

Q. Okay. And did you -- does this -- what is this? Sorry.

A. It is my tweet.

Q. Okay. No one else tweeted this?

A. No.

Q. Okay. And did you tweet on February 11th, 2019, at 8:09 p.m., that Vic is the legal definition of harassment?

A. That was not my intent. There's a typo. I didn't even realize that I had accidently said he's the legal definition. I meant to say here's the legal definition of harassment. And I didn't realize it was a typo until I was sent my takedown notices.

If you read the entire thread you can see

that I was being harassed, and so I was trying to explain to children that don't understand what harassment is.

Q. Okay. And what is your definition of harassment?

A. Harassment, to me, is -- is constantly bugging and picking on someone even after they've repeatedly asked you to stop, or, I can't answer said questions, or whatever, to the point of being a nuisance or a threat.

Q. Do you believe that Vic is the legal definition of harassment?

A. I'm not even sure what the legal definition of harassment is. I think I had copied and pasted that from a Wikipedia or something.

Q. Okay.

(Exhibit 32 marked.)

Q. (BY MS. CHRISTIE) I'll mark this as Exhibit 32. Oh, wait. Sorry. Okay. I'm handing you what I've marked as Exhibit 32. Does that appear to be a tweet with your name?

A. Yes, ma'am.

Q. Okay. And would you say this is your tweet?

A. I believe it is. I don't recall making it, but it is my Twitter handle.

Q. Okay. In this tweet on February 19, 2019, at

6:48 a.m., did you tweet -- and I'm taking this out of context a little bit -- of, "I've spoken up for years."

A. Uh-huh.

Q. To whom had you spoken up to?

A. I spoke to Vic directly. I sent him two emails in the early 2000s about his behavior and how he was burning bridges and -- and -- and people were not looking at him favorably. And I mentioned it to ADV Films back in the day.

Q. Okay.

A. Other than that, I can't recall who I've spoken to about it.

Q. Okay. Besides Tammi Denbow, in January of this year, who else had you spoken to about the -- the alleged assault in 2007?

A. I was so shaken, the only person that I know knew about it early on was Rawly Pickens, who was my -- my boyfriend of five years after that convention.

Q. Did you ever observe Rawly confront Vic about that?

A. No, ma'am.

Q. Was Vic confronted about it at that time?

A. No, ma'am.

Q. You had not told Ron until January of this year?

A. I chose not to tell Ron -- we speak about everything, but that incident rattled me so badly, along with the incident when I was 15 years old, that my way of coping for a very long time was just to put it in the back of my mind and not even discuss it. So, no, I did not tell him until January.

Q. What number are we?

A. 33.

Q. 33. Okay.

(Exhibit 33 marked.)

Q. (BY MS. CHRISTIE) I have marked this as Exhibit 33.

MR. ERICK: Is this -- I'm sorry, is this all together?

MS. CHRISTIE: Yes, sir.

MR. ERICK: All right.

Q. (BY MS. CHRISTIE) On the first page of this document, what does that appear to be?

A. One of my tweets.

Q. And what is the date on that tweet?

A. February 19, 2019.

Q. Okay. Is there a time on that?

A. 5:15 p.m.

Q. Okay. And is this the tweet -- or does this appear -- is this your tweet?

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A. Yes, ma'am.
Q. Okay. And is this the tweet where you -- you told your story?
A. Yes, ma'am. Excuse me.
Q. And does that -- there's a screenshot there, but do the following pages appear to be the actual narrative of your story of -- that you can read?
A. Let me just check it real quick and make sure.
Yes. This appears to be it.
Q. And that's the entire narrative? It appears to be the entire narrative of your story, or appears to be?
A. It appears to be.
Q. Okay.
A. It's hard to say --
Q. Okay.
A. -- because I can't really read the text in the small picture.
Q. And I have a question for you, and I hope this does not seem to be insensitive, but why did you wait for 11, 12 years, before telling this story to anyone?
MR. ERICK: Objection, form.
A. I -- like I said, dealing with the emotional turmoil, I compartmentalized it -- I think that's the term the therapist uses -- compartmentalized it, pushed it away, so that it wasn't in the forefront of my brain.

It wasn't until I got a text message from the XXXX twins saying, Hey, you know, we need to talk to you about something, but I think the best thing for us to do is just send you something. So they emailed me their story, and that's -- that's when I started to speak up.
Q. (BY MS. CHRISTIE) Okay. Did you -- did you produce that email to your attorney?
A. No, because it didn't mention Vic, it just said we need to talk to you.
Q. Okay. And with regard to the XXXX twins, did they live with you and Ron?
A. Yes. XXXXX lived with us for about a year, and then XXXX, for a couple of months. In our garage apartment, I should say, not in our house.
Q. What was the time frame for that?
A. Oh, I don't recall.
Q. Was it --
A. A couple of years ago.
Q. Was it like 2017?
A. It was while -- we've been in our house for three years, so somewhere in --
Q. 2016 to --
A. -- that time period.
Q. 2016 to --

A. 2016, 2017, maybe.
Q. Were they --
A. I'm not sure.
Q. So they weren't living with you in January of this year?
A. No, ma'am.
Q. Okay. And during that time frame that they lived with you, how often would you see them?
A. It depended on how busy I was and how much I was in town, but once a week at least.
Q. Okay. And during this time frame -- strike that.
Did they confide in you?
A. About --
Q. Just about --
A. -- anything?
Q. -- general things, like things going on in their lives or boyfriends?
MR. ERICK: Objection, form.
A. To an extent, but not really. They were pretty guarded in a lot of ways.
Q. (BY MS. CHRISTIE) Okay. And so they -- they never said anything to you about their -- their alleged incident with Vic until right around the time the movie was getting ready to premier?

A. They -- I know that any time we mentioned Vic they would bristle and kind of look at each other, and they would just say, you know, we had a bad experience, but they never elaborated on that.
Q. And you never pressed them to find out?
A. No. That would have been rude. I could tell they didn't want to talk -- talk about it.
Q. And do you understand that someone that's perceived to be a good friend of Vic's publicly, that comes out and tells a story, that your story would carry more weight than, say, a fan's story might carry?
MR. ERICK: Objection, form.
A. I understand because we're public figures that, yes, there's going to be a little more intention.
Q. (BY MS. CHRISTIE) And that telling a story could damage somebody?
MR. ERICK: Objection, form.
A. I mean, I don't know what telling the story -- I don't know what kind of -- what would come out of that.
Q. (BY MS. CHRISTIE) Okay. Well, that there could be potential repercussions?
MR. ERICK: Objection, form.
A. I suppose it's possible.
Q. (BY MS. CHRISTIE) And you had indicated you

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had sent Vic a couple of emails in the early 2000s. How many times did you try to address Vic's behavior with him?

A. It was more than just emails. We spoke in person. There were several accounts where he made handlers cry, yelled at staff, and so I was usually the -- they joked and called me the Vic Whisperer. So I would go and calm him down and try to deal with the situation.

Q. And this question may seem odd, but you understand that just because you're a jerk, it doesn't mean that you're a predator, a pedophile, or a sexual assaulter? Do you under -- do you understand that?

MR. ERICK: Objection, form.

A. I understand that people can be jerks, regardless.

Q. (BY MS. CHRISTIE) And how many times are you alleging that Vic would take a fist full of your hair and whisper in your ear?

A. Oh, I can't even count how many times that's happened.

Q. Was it every time you saw him?

A. Not every time, but it was almost -- almost every time, depending on who was around us.

Q. And how many years since you've known Vic,

which appears to be about 19, 20, working on 20, have you worn your hair short like this?

MR. ERICK: Objection, form.

A. Oh, I don't know. I've had so many hairstyles over the years.

Q. (BY MS. CHRISTIE) Was it common for you to wear your hair shorter?

A. I don't know. I've had -- seriously, as a hairstylist, I've had almost every haircut under the sun, even in the last three months.

Q. Would you agree with me that it would be harder for somebody to grab and pull hair if -- if it's really short?

A. Yes.

MR. ERICK: Objection, form.

THE WITNESS: Sorry.

MR. ERICK: That's all right.

Q. (BY MS. CHRISTIE) And would Vic grab your hair when it was short?

A. I -- I can't recall. I can't recall. I know that he saw me recently, and instead of grabbing my hair, he grabbed my neck, the back of my neck.

Q. When was recently?

A. Whenever we did the Broly press stuff, December.

Q. Do you consider yourself to be a strong, confident woman?

MR. ERICK: Objection, form.

A. Yes, ma'am.

Q. (BY MS. CHRISTIE) Do you consider yourself to be weak?

MR. ERICK: Objection, form.

A. With certain things, of course. I think we all have our weaknesses.

Q. (BY MS. CHRISTIE) And -- and I ask that -- and I ask that question, because yesterday during Mr. Toye's deposition he indicated that he had to be the protector for the weak, and he kept saying your name. And I'm just trying to clari -- I'm just trying to clarify, you know, that you -- you see -- you view yourself as a strong person?

MR. ERICK: Objection, form.

A. I view myself as a strong person, however, I have experienced trauma that has made me weak in certain areas and aspects.

Q. (BY MS. CHRISTIE) And did you ever use physical force to push Vic away from you?

A. Yes, ma'am.

Q. Did you ever tell him, Dude, don't grab my hair, don't whisper in my ear?

A. Yes, ma'am.

MR. ERICK: Objection, form.

THE WITNESS: Sorry.

A. Yes, ma'am.

MR. ERICK: Just a half second more --

THE WITNESS: Sorry.

MR. ERICK: -- would be good.

Q. (BY MS. CHRISTIE) And maybe not dude, but Vic?

A. Yeah.

MR. ERICK: Same.

Q. (BY MS. CHRISTIE) Okay. Do you recall when you told him to stop?

A. There were quite a few times. I can't remember them all.

MS. CHRISTIE: I think right now would be a good time to take a break, if everybody's okay with that?

MR. ERICK: Yep.

THE VIDEOGRAPHER: And we're going off the record at 10:19.

(Break taken from 10:19 a.m. to 10:36 a.m.)

THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 2. The time is 10:36.

Q. (BY MS. CHRISTIE) Okay. I'm sorry to keep

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going over the situation in 2007, but I'm going to hand you what I've marked as Exhibit 34.

(Exhibit 34 marked.)

Q. (BY MS. CHRISTIE) And what does this appear to be?

A. It appears to be one of my tweets.

Q. And what is the date on that?

A. February 19, 2019.

Q. And is there a timestamp on that?

A. 9:43 p.m.

Q. Okay. And in this tweet you are briefly discussing, or it appears that you're briefly discussing, the alleged incident that happened in 2007; is that true?

A. Yes. Sorry.

Q. Okay.

A. I'm still reading it.

Q. Okay. Okay. Sorry.

A. No, that's okay.

Q. Need to give you time.

A. Okay.

Q. Okay. And in this tweet where you say I went to a friend's room and he grabbed me by my upper arms and french kissed me, there's no mention of him pushing you to the bed, correct?

A. No. I think I saved --

Q. Okay.

A. I didn't post details at that time.

Q. Okay. And there's no mention of Stan -- Stan knocking on the door?

A. No. Because --

Q. Okay.

A. -- like I said, I didn't post the details at that time.

Q. Okay. All right. And I'm going to switch gears just a little bit, because I missed some questions in my outline.

There have been -- I have seen some comments through several Twitter tweets that Vic was considered powerful.

A. Oh, yes. In the industry?

Q. Yes.

A. Yes, considerably.

Q. And have -- have any of the voice actors been fired from a project at his request, that you are aware of?

A. Not that I know of.

Q. Okay. And this is just my observation, but, to me, I would think that someone having more roles would be more powerful in an industry.

A. That's not necessarily the case. There are a lot of people who have a lot of roles, who don't speak up, who don't -- you know, it just depends on the situation.

Q. Okay. And what -- what -- what did you see that you felt made Vic powerful?

A. Well, he has a presence in the community, he was always wheeling and dealing and trying to find new connections, and so he did have a lot of connections in the industry. He -- the -- the studio saw him as somebody who they could attach his name to a project and it would make more money.

For example, there's a show called Tsubasa Reservoir Chronicles, and I'm one of the leads. And my name does not appear on the box, but Vic Mignogna's name does, even though I'm the lead character.

Q. Okay. And do you know of anyone who has tried to get Vic fired from any jobs?

A. No, ma'am.

Q. And have you -- do you know anyone that has said to you, Monica, I -- Vic needs to be replaced in this role?

A. No, ma'am.

Q. Okay. And earlier, you had -- you had mentioned Michele Specht.

Prior to the Ichi -- Ichibancon (phonetic) --

A. Oh, Izumicon?

Q. Izumicon. Okay. Sorry. Wrong one.

A. That's okay.

Q. The Izumicon in 2007, how many times had you been around her?

A. I don't know the number of times. I know that we were friends, but I don't know exactly how many times I've seen her.

Q. How often did you communicate with her, prior to this incident in 2007?

A. I don't know.

Q. Okay. And I believe you -- she's been described as a close friend, so describe what about your relationship made her a close friend.

A. I wouldn't say she was close, like, she wasn't a best friend or anything, she was a lot of fun. So whenever we were at conventions together, we would make a point to get together and, you know, go to dinner or do something all together. So I would say she was a close convention friend, if that makes sense.

Q. Uh-huh. Yes. And I believe you said this earlier, but if you had distanced yourself from Vic, why would you have sent the kissy face emoji?

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A. Because it's my job to put up appearances and make it appear as though everything is great, but, also, like I said in my statement, I made every effort to try and move past that event, thinking it was a one-time thing with me alone, and I wanted to forgive him. I wanted to believe that he was a better person than that.

Q. Could you just have said, I had fun?

MR. ERICK: Objection, form.

A. Yes. But if you look at my Twitter you'll see that I use emojis all the time, so it would have been out of character for me not to use an emoji. I use hearts constantly.

Q. (BY MS. CHRISTIE) And on this evening in 2007, I know that's been many years ago so the details might be fuzzy, or you might have kind of compartmentalized some stuff, but you -- you and Vic had planned to go to dinner with Stan?

A. Yes. It was what they call a dead dog, which is a little get-together they do after the convention to kind of wrap everything up with the staffers and --

Q. Okay.

A. -- everyone.

Q. Okay. And -- and had -- had Stan given you a time when you were going to go to dinner?

A. I don't recall whether he gave us a specific

time. I know he did say, I'll go by the room and get you when we're on our way.

Q. And how long were you in Vic's room?

A. Oh, I don't -- I don't know.

Q. And how did Stan know to knock on the door of Vic's room and not yours?

A. Because we had said -- he -- he had asked me -- Vic had asked me to come to his room to see the video in front of Stan.

Q. Okay. And I'm going to be asking you a couple of questions, please know that I'm not --

A. I understand.

Q. -- trying to -- to discredit or discount or -- your -- what you have told us. But if -- if Vic knew Stan was coming to get you, why -- why would Vic -- I mean, to your knowledge, why would Vic have initiated anything?

A. I don't know.

MR. ERICK: Objection, form.

A. I don't know. I can't answer that for him.

Q. (BY MS. CHRISTIE) And couldn't Stan have come to the door at any moment?

A. I don't know.

Q. But it's possible? I mean, he could have come at any moment?

A. I have no idea what Stan's plans were that day.

(Exhibit 2 previously marked.)

Q. (BY MS. CHRISTIE) And -- okay. So during the depositions the past two days, there have been some articles that we have mentioned. And I'm going to hand you what was Exhibit 2. Okay. This appears to be -- or could you tell us what this appears -- Exhibit 2 appears to be.

A. It appears to be -- excuse me -- an article on Polygon.

Q. Okay. And do you know what Polygon is?

A. I would assume it is a news site.

Q. Okay. And were you contacted by Polygon?

A. I was contacted by Polygon when Vic filed the lawsuit, and they were asked -- I was asked to comment on it.

Q. Were you con -- were you contacted by them to comment for this article?

A. No, ma'am.

Q. Okay. And how did they contact you when the suit was filed?

A. Through my talent agent.

Q. Okay. And then I'm going to hand you what --

A. Do you want to put an exhibit --

Q. Yes, I'll take that back.

(Exhibit 4 previously marked.)

Q. (BY MS. CHRISTIE) I'll hand you what was marked as Exhibit 4 earlier. And what does this appear to be?

A. It appears to be an article on Anime News Network.

Q. Okay.

A. Or I can't tell if that's the News Network or if that's just a banner at the top.

Oh, it is. Anime News Network. Sorry.

Q. Okay. Okay. And what is anime News Network?

A. It is a news site about anime.

Q. Okay.

A. Sorry.

Q. That makes sense.

A. Sorry.

Q. That makes sense.

And does this appear to be an article regarding Vic?

A. Yes, ma'am.

Q. Okay. Were you contacted by Anime News Network to comment for this article?

A. No, ma'am.

Q. Have you been contacted by Anime News Network since this article was --

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A. Not that I know of. I mean, Twitter handles, it's impossible to tell who is talking to you.

Q. Okay.

A. So as far as I know, no.

(Exhibit 5 marked.)

Q. (BY MS. CHRISTIE) Okay. Just change -- we'll just exchange.

And then I've handed you what is marked as exhibit -- or what has been marked as Exhibit 5. And what does that appear to be?

A. I honestly am not sure which -- is it one of these? I'm not -- it's either a blog, book, Manga, or about.

Q. Okay. What does it -- what does the title say?

A. It says, "Fixing the Staircase: Vic Mignogna's Sexual Assault Allegations and the Voice Actors Who Speak Out."

Q. Okay. Did you provide any information for this article?

A. Not that I'm aware of, no.

(Exhibit 8 previously marked.)

Q. (BY MS. CHRISTIE) Okay. Articles, articles. Okay. And then I'm handing you what has been previously marked as Exhibit 8. And what does this appear to be?

A. It appears to be a -- an article on Gizmodo.

Q. Okay. And --

A. But this looks like a tweet, so I'm not -- I'm confused.

Q. I think it might be part of the article.

A. Oh, is it just the picture? Okay.

Q. Yes, ma'am.

Did you provide any comments for this article?

A. Yes, ma'am.

Q. Okay. And are you Charlotte in this article?

A. I wouldn't know. I asked for Beth to choose a pseudonym so it wouldn't be under my name.

Q. Okay. And so you spoke with Beth Elderkin?

A. Yes, ma'am.

Q. And how did you speak to her?

A. On the phone.

Q. Okay. Did you ever communicate with her through email or text?

A. No, ma'am.

Q. Okay. And why did you choose to participate in this article as opposed to any other places?

MR. ERICK: Objection, form.

A. This particular article, I'm not sure, honestly. I wasn't reached -- I think they were one of the few that reached out, and I thought about it long

and hard before I agreed to it, but --

Q. (BY MS. CHRISTIE) Okay. And if I were to tell you that I -- and I do not have it, so I apologize -- if I were to tell you that I had seen a tweet or a statement by you where you said you did not want to ruin Vic's life, would that be an accurate statement?

MR. ERICK: Objection, form.

A. Would that -- I'm sorry, inaccurate or accurate?

Q. (BY MS. CHRISTIE) Would it be accurate?

A. That I don't want to ruin his life? Yes.

MR. ERICK: Objection.

THE WITNESS: Sorry.

MR. ERICK: Objection, form.

A. Yes, that is accurate.

Q. (BY MS. CHRISTIE) And do you still feel that way?

A. Yes.

Q. And do you understand that by calling Vic a predator, or a sexual harrasser, or sexual assaulter, and participating in the investigation and participating in the Gizmodo article, that that has done some damage to his life?

MR. ERICK: Objection, form.

A. I don't know how or if it's damaged, I just

know that I participated.

Q. (BY MS. CHRISTIE) But you understand that as part of the investigation at Funimation, he was terminated from working with them?

A. I understand --

MR. ERICK: Objection, form.

THE WITNESS: Sorry.

A. I understand that, yes.

Q. (BY MS. CHRISTIE) And -- and do you understand that it can appear to be suspect or suspicious to people that you did not raise the incident that occurred in 2007 before now?

MR. ERICK: Objection, form.

A. Raise it to the internet or to -- to the investigators or --

Q. (BY MS. CHRISTIE) No, to -- just in public.

MR. ERICK: Objection, form.

A. I'm sorry, could you repeat the question?

Q. (BY MS. CHRISTIE) Yes, ma'am.

A. I'm trying to wrap my head around it.

Q. Do you -- do you understand that it could appear to be suspicious that you did not raise or ever -- or address in public the alleged incident that occurred with Vic until now?

MR. ERICK: Objection, form.

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A. I don't know. That -- I don't know what other people think about it.

Q. (BY MS. CHRISTIE) If you were a fan, what would you think?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MS. CHRISTIE) Okay. And I saw -- I believe it's in your story -- that you were in therapy?

MR. ERICK: Objection, form.

A. Yes, ma'am.

Q. (BY MS. CHRISTIE) And was Ron aware that you were in therapy?

A. I'm sure we --

MR. ERICK: Object --

THE WITNESS: Sorry.

A. I'm sure we --

MR. ERICK: Objection, form.

Go ahead.

A. I'm sure we've discussed it over the years.

Q. (BY MS. CHRISTIE) And you had stated about two weeks after doing press for Broly, and it's in your statement and the exhibit, I believe 33 or 34, that three friends came forward. Would these friends be the XXXX twins and XXXX?

A. Yes, ma'am.

Q. Okay. And how often had you been around XXXX prior to the investigation?

A. It's hard to say offhand. I saw her predominantly at conventions.

Q. Okay. What does she do for a job; do you know?

A. Now?

Q. Yes, ma'am.

A. Now, she works at -- oh, gosh, what is the name of it? Morphe in NorthPark mall; it's a makeup company.

Q. Oh, okay. Do you know what her job was at Funimation?

A. I believe it was subtitling.

Q. And were you aware that Vic and XXXX had been texting and talking and having lunches together for about a year prior to when she has indicated that this alleged incident happened?

MR. ERICK: Objection, form.

A. No, ma'am.

Q. (BY MS. CHRISTIE) And why did you come forward, like, in January of this year?

MR. ERICK: Objection, form.

A. Do you mean on Twitter?

Q. (BY MS. CHRISTIE) On Twitter, or with the investigation with Funimation.

MR. ERICK: Objection, form.

A. With the investigation, I came forward because, as I said earlier, the XXXX twins let me know they needed to talk to me about something. And they emailed me their statement and I read it. And when I read it, I noticed that there were details that were so incredibly similar to what had happened to me, that it started to make me wonder if maybe the one-time thing wasn't a one-time thing, and maybe I had forgiven him, not realizing that there was more to the story.

And so then with that, coupled with XXXX then telling me the same thing, which, again, was along the same lines of what had happened to me, then I decided that I should probably speak up, if, for nothing else, because of the statute of limitations passing, at least it would corroborate the other stories so that they would know that they weren't the only ones.

Q. (BY MS. CHRISTIE) Do you believe that Vic should lose a 20-year career?

MR. ERICK: Objection, form.

A. I believe that actors deserve a safe work environment, and if that has to be the outcome, then, yes.

It's not on the microphone. Sorry. I just had a dribble. It's not on the microphone, so we're okay.

Q. And what do you consider to be a safe work environment?

A. A safe work environment, to me, would mean being able to come to work and everyone is professional, there's no kind of weird harassment, there's no kind of anxiety. Basically, making sure that it is a fun work environment, that nobody has to worry about anything that's going to make them uncomfortable or unhappy.

Q. Okay. And what, in your personal opinion, would it take for Vic to be able to come back to work?

MR. ERICK: Objection, form.

A. I believe I stated it in one of my Twitter statements or I know I've said it on Twitter repeatedly, that I have said that if he would apologize and he would seek counseling and seek help, that, at that point, then I feel like maybe he -- they would consider -- and lay low for a while, that maybe in the future he would have a path to redemption.

Q. (BY MS. CHRISTIE) Okay. And were there ever times where you and Vic were -- were in the recording booth together?

A. Not that I can recall. We usually work individually.

Q. And is there a requirement that you and he be together to record anything?

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A. No, not that I can think of.
Q. So it would be possible that you -- you and he could actually work on the same produc -- same show without ever having any contact with each other?
MR. ERICK: Objection, form.
A. Yes, ma'am. In fact, there's actors I've worked with for years that I've never even met.
Q. (BY MS. CHRISTIE) Okay. You have stated -- and I think we've discussed some specific conventions. How many are you scheduled to attend this year?
A. I honestly don't know offhand. It's been quite a few.
Q. And how many have you attended thus far?
A. Oh, I have no idea.
Q. Okay.
A. A lot.
Q. Has it been every weekend this year thus far?
A. Not every weekend.
Q. Have there been any conventions that you were invited to that you have not participated in?
A. Yes, ma'am.
Q. Okay. Which ones?
A. Kameha Con --
Q. Okay.
A. -- and River Region Comic Con. And I'm sure,

prior to this year, there were a few that I've had to miss.
Q. And why did you not attend the Kameha Con?
A. Because Vic was attending, and I was worried about my safety.
Q. Did you do a separate signing that weekend?
A. Yes, ma'am.
Q. Okay. And what about the River Region Comic Con? Sorry.
A. I had norovirus so I could not go. It was awful.
THE WITNESS: Thanks, Ron.
Q. (BY MS. CHRISTIE) Sorry about that.
A. No, it was the worst. It was awful. I don't wish that on anyone.
Q. No, I would not wish that on anybody.
A. It's bad.
Q. Okay. With regard to these conventions, do you know any of the owners or organizers?
A. I've met a few.
Q. Are there any that you speak to on a regular basis?
A. Not on a regular basis, no.
Q. Okay. And have -- have there been any owners or organizers that you have spoken to about Vic?

A. Yes, ma'am.
Q. And who would those be?
A. Chris Slatosch.
Q. Okay. Is he the only one?
A. Yes.
Q. And have you -- have there been any other -- who is Chris Slatosch?
A. Chris Slatosch is a convention runner in Texas. He has several conventions in the state.
Q. Does he run Kameha Con?
A. Yes, ma'am.
Q. And are there any other conventions that have listed both you and Vic to have appearances, that you have told them you would not attend if Vic is present?
A. No, ma'am. The only one I can think of is Kameha Con.
Q. Okay. And have you -- have you threatened to not attend conventions if they invite Vic?
A. I don't think that's in my stipulations, no.
Q. And have you had any voice actors, through your career, say things about you that are untrue?
A. Not that I can think of, offhand.
Q. And yesterday, when Ron gave his -- his deposition, he had indicated that a lie could be just not telling about something. Do you agree with that?

MR. ERICK: Objection, form.
A. To me, a lie is knowingly telling a falsehood.
I can't speculate what Ron thinks it is.
Q. (BY MS. CHRISTIE) And this is just a hypothetical, so it may be a "don't know." But would you -- would you think that calling someone a predator, when they've never been convicted of anything, is a lie?
MR. ERICK: Objection, form.
A. I don't know.
MS. CHRISTIE: At this time, would it be possible for us to break for lunch? Would you be okay or --
MR. VOLNEY: Sure.
MR. BEARD: We don't have much left --
MR. ERICK: Okay.
MR. BEARD: -- but we need to -- we need to caucus.
MS. CHRISTIE: Yeah.
MR. BEARD: And you and I need to have a conversation too.
MR. ERICK: Okay.
MS. CHRISTIE: We may -- we may be able to come back and --
MR. ERICK: Okay. And finish?
MS. CHRISTIE: -- pass the witness. Yeah.

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MR. ERICK: Great. All right. Yeah.
THE VIDEOGRAPHER: And we're going off the record at 11:03.
(Break taken from 11:03 a.m. to 12:29 p.m.)
THE VIDEOGRAPHER: And we're back on the record. The time is 12:29.
MS. CHRISTIE: At this time, we will pass the witness.
MR. VOLNEY: No questions for me.
MR. JOHNSON: No questions at this time.
MR. ERICK: We'll reserve ours for trial. Thanks.
THE VIDEOGRAPHER: And we're going off the record at 12:29.

(Deposition concluded at 12:29 p.m.)

CHANGES AND SIGNATURE

WITNESS NAME: MONICA RIAL DATE: JUNE 28, 2019

PAGE	LINE	CHANGE	REASON

I, MONICA RIAL, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

_____
MONICA RIAL

THE STATE OF _____)
COUNTY OF _____)

Before me, _____, on this day personally appeared MONICA RIAL, known to me (or proved to me under oath or through _____) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, _____.

_____
NOTARY PUBLIC IN AND FOR
THE STATE OF _____
COMMISSION EXPIRES: _____

NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	)	IN THE DISTRICT COURT
VS.	)	TARRANT COUNTY, TEXAS
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE, Defendants.	)	141st JUDICIAL DISTRICT

REPORTER'S CERTIFICATION
DEPOSITION OF MONICA RIAL
JUNE 28, 2019

I, Claudia White, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, MONICA RIAL, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature and return to CSI Global Deposition Services by _____;

That the amount of time used by each party at the deposition is as follows:

Ms. Carey-Elisa Christie, Esq. - 01 HOURS:46 MINUTE(S)
Mr. Casey S. Erick, Esq. - 00 HOURS:00 MINUTE(S)

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Mr. John Volney, Esq. - 00 HOURS:00 MINUTE(S)
Mr. Sam Johnson, Esq. - 00 HOURS:00 MINUTE(S)

That pursuant to information given to the Deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

Ms. Carey-Elisa Christie, Esq., and Mr. Ty Beard, Esq., Attorneys for Plaintiff
Mr. Casey S. Erick, Esq., Attorney for Defendants Monica Rial and Ronald Toye
Mr. John Volney, Esq., Attorney for Defendant Funimation
Mr. Sam Johnson, Esq., Attorney for Defendant Jamie Marchi

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule 203 of TRCP will be certified to after they have occurred.

Certified to by me this 29th day of June, 2019.

Claudia White, Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was/was not returned to the deposition officer on _____;

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition was delivered to Ms. Carey-Elisa Christie, Custodial Attorney;

That $_____ is the deposition officer's charges to the Plaintiff for preparing the original deposition transcript and any copies of exhibits;

That the deposition was delivered in accordance with Rule 203.3, and that a copy of this certificate was served on all parties shown herein on and filed with the Clerk.

Certified to by me this _____ day of _____, 2019.

Claudia White
Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

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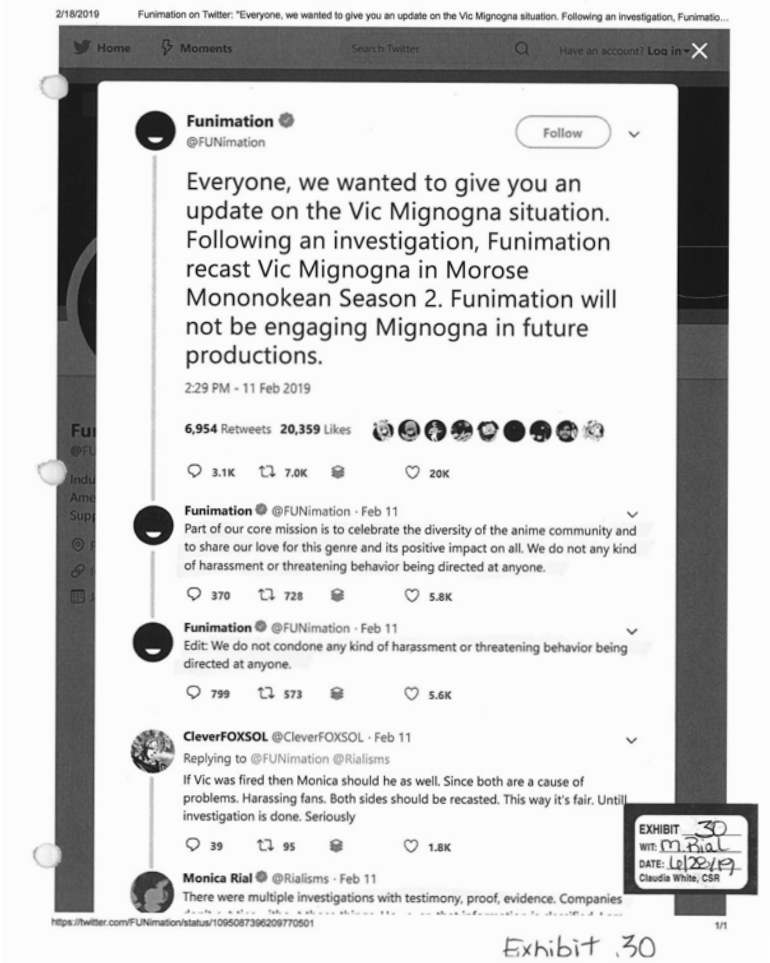

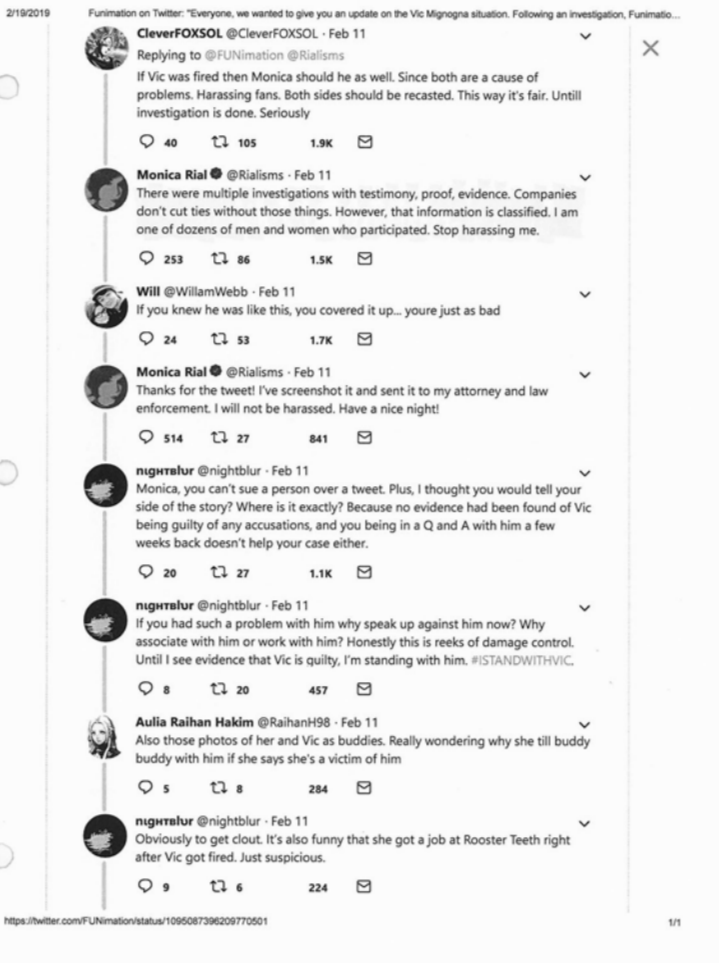

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Monica Rial @Rialisms · Feb 11

"Freedom of Speech" does not equal "freedom from consequence". Before you choose to harass me, please be aware that I have attorneys and law enforcement involved. We are taking all threats/harassment very seriously. Any harassment/threats will be screenshot and forwarded.

1.9K 976 6.6K

Monica Rial @Rialisms — Follow

And just so we're clear, he's the legal definition of harassment: Harassment is governed by state laws, but is generally defined as a course of conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety.

8:09 PM - 11 Feb 2019

EXHIBIT 31
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 31

Monica Rial @Rialisms — Following

Replying to @StiffyDale @xXReiBearXx @IzAMusicalGeek

That's not true. I've spoken up for years. Unfortunately, nobody did anything about it until now.

6:48 AM - 19 Feb 2019

2 Retweets 14 Likes

33 2 14

EXHIBIT 32
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 32

Monica Rial @Rialisms — Follow

These last few weeks have been some of the hardest of my lifetime. Please understand that we are ALL hurting. No matter what you choose to believe, please be kind. <3

First, please know that I've tried to address his behavior with him. I'm the kind
I tell you when you have food in your teeth and I was tired of people talking at
his back. How would he change if he didn't know his behavior was wrong? Eac
apologize and then be back at it within weeks. The studios slowly began to stop
n, not just because of sexual harassment, but because he was difficult to work
ough he had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, a
- so closely to my ear that his lips were touching or kiss my cheek/neck. This w
front of fans or colleagues so I had to be very careful about how I reacted. I di
ow inappropriate it was because he did it to so many people. I've witnessed i
others have witnessed it happen to me; colleagues *and* fans.

In the mid-2000s we were at a convention together and he grabbed me and k
om room. I froze. You may wonder why I didn't yell or scream or push him away
Why? Because I was raped as a teenager and I learned that sometimes fighti
t worse. Why did I go to his room? Because he asked me to watch a video and
ause he was my friend. Not only that, but he was dating my friend Michele an
rting with my soon-to-be-boyfriend at the convention all weekend. After that
nce, I distanced myself from him and unfortunately Michele as well. I felt incre
ven though I hadn't done anything wrong. I went to therapy and worked on fo
to forgive him for what he had done. Maybe it was just me? Maybe it was a or
ver to be repeated again? You can imagine my devastation when I learned th
r one. That it was happening to colleagues, and worse yet, convention attende

5:15 PM - 19 Feb 2019

2,347 Retweets 10,251 Likes

2.6K 2.3K 10K

Tweet your reply

MistareFusion @MistareFusion · 11h

Replying to @Rialisms

Thank you so much for coming forward and having the courage to endure all the slings and arrows, even though you should never have had to. God forbid, but if I ever found myself in such a situation, I hope I'd have the courage to stand up too. It's the only way to foster change.

1 1 38

1 more reply

Guy Hero @theman22022 · 14h

Replying to @Rialisms

Vic only wanted peace. He told his fans to not start anything. But then you started attacking him and his fans. So they fought back. And here we are. You lashed out at people who wanted the proof. Nothing has been shown. Until theres actually proof. No one will stop. Im stopping

EXHIBIT 33
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 33

First, please know that I've tried to address his behavior with him. I'm the kind of friend that will tell you when you have food in your teeth and I was tired of people talking about him behind his back. How would he change if he didn't know his behavior was wrong? Each time, he would apologize and then be back at it within weeks. The studios slowly began to stop working with him, not just because of sexual harassment, but because he was difficult to work with. Even though he had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, and either whisper so closely to my ear that his lips were touching or kiss my cheek/neck. This was usually done in front of fans or colleagues so I had to be very careful about how I reacted. I didn't even realize how inappropriate it was because he did it to so many people. I've witnessed it happen, just as others have witnessed it happen to me; colleagues *and* fans.

In the mid-2000s we were at a convention together and he grabbed me and kissed me i his hotel room. I froze. You may wonder why I didn't yell or scream or push him away. I was scared. Why? Because I was raped as a teenager and I learned that sometimes fighting back makes it worse. Why did I go to his room? Because he asked me to watch a video and I trusted him because he was my friend. Not only that, but he was dating my friend Michele and I had been flirting with my soon-to-be-boyfriend at the convention all weekend. After that experience, I distanced myself from him and unfortunately Michele as well. I felt incredibly guilty even though I hadn't done anything wrong. I went to therapy and worked on forgiveness I chose to forgive him for what he had done. Maybe it was just me? Maybe it was a one-time thing never to be repeated again? You can imagine my devastation when I learned that I wasn't the only one. That it was happening to colleagues, and worse yet, convention attendees.

Exhibit 34

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All the pictures and messages that are being passing around were taken at the press events and premiere for the Broly movie in mid-December. About 2 weeks after that, three of my close friends came forward. When these friends shared their stories with me, I was heartbroken. How could this happen to three of my close friends without me ever knowing? As more people came forward, I began to see the similarities. I chose to share my testimony with investigators solely because it corroborated the others' testimony. I didn't start this, I have nothing to gain from it, I didn't steal anyone's roles or titles; the stuff you're hearing on YouTube is all lies attempting to create drama and get subs/views. I'm perfectly content being *just* a voice actor.

The investigations were incredibly thorough. Each person was interviewed, the evidence weighed, and a decision made. Each company has to look out for the safety of their employees. In this instance, these companies felt they made the best decision to protect their employees and contract workers. Also, these companies aren't obligated to share any information with you. Many of the women who've come forward have chosen to remain anonymous, especially after seeing the way that I've been attacked. Please respect their privacy.

I didn't want to come forward on Twitter but I felt like I had to do something because my friends' lives, children, and careers were being threatened. Also, I knew if I didn't, there was a very good chance that this would just get swept under the rug... again.

I apologize for lashing out and threatening fans. I don't want to have to take people to court or send law enforcement after them but I was doing what I felt necessary to protect myself at the time. There is a watch list and I have the names and numbers of multiple harassers, but I'm willing to forgive if you'll stop the madness now. You may feel that my colleagues and I have been harsh, but let me ask you this: how would you respond if your life was being threatened? If the lives of your loved ones, your friends, your friends' children, were being threatened? If your addresses and phone numbers were being passed around like candy so people could call or drop by just to antagonize you? If the local authorities made sure to drive past your house daily, just to make sure you're okay? If you were forced to be on the phone with various law enforcement and lawyers every single day? If people were trying to get you fired just because you came forward with the truth? If you were doxxed because people think it's fun to attack those who are hurting?

I have always stood up for this community. I have loved the anime fandom from the moment I went to my first convention. To be threatened like this by the community I love, really hurts m heart. I recently stood up for the Dragon Ball fandom, only to have that community come back and attack me mercilessly. It has been so incredibly painful, I can't even express.

I have never said anything hurtful toward Vic or any of his fans. I don't want to ruin his life, he was/is my friend. I don't want him to be labeled a predator for life. I want him to get help and realize that his actions have hurt many people, including me. If he takes the necessary steps to better himself, then perhaps I would be willing to forgive him again.

I'm tired of the fighting, I'm tired of the threats, all of it. From here on, I will only be posting positivity and light. Any threats or retaliation will be met with an immediate block. I'm not wasting any more time on this matter. It's over. This has been incredibly difficult for everyone involved. Please be kind to one another. <3

Much love,
Monica

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Exhibit J

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NO. 141-307474-19

VICTOR MIGNOGNA,	)	IN THE DISTRICT COURT
	)	
Plaintiff,	)	
	)	
VS.	)	TARRANT COUNTY, TEXAS
	)	
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE,	)	
	)	
Defendants.	)	141st JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF

RONALD TOYE

JUNE 27, 2019

ORAL AND VIDEOTAPED DEPOSITION OF RONALD TOYE, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on June 27, 2019, from 9:28 a.m. to 3:49 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Job No. 132313

DEPOSITION OF RONALD TOYE
June 27, 2019

A P P E A R A N C E S

FOR THE PLAINTIFF:
Mr. Ty Beard, Esq.
Ms. Carey-Elisa Christie, Esq.
BEARD HARRIS BULLOCK HUGHES, PC
100 Independence Place
Suite 101
Tyler, Texas 75703
(903) 509-4900
ty@beardandharris.com
carey@beardandharris.com

FOR THE DEFENDANT RONALD TOYE AND MONICA RIAL:
Mr. Casey S. Erick, Esq.
COWLES & THOMPSON
901 Main Street
Suite 3900
Dallas, Texas 75202
(214) 672-2000
cerick@cowlesthompson.com

FOR THE DEFENDANT FUNIMATION:
Mr. John Volney, Esq.
LYNN PINKER COX & HURST, LLP
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
(214) 981-3839
jvolney@lynnllp.com

FOR THE DEFENDANT JAMIE MARCHI:
Mr. Sam Johnson, Esq.
JOHNSON SPARKS
7161 Bishop Road
Suite 220
Plano, Texas 75024
(972) 918-5274
sam@johnsonsparks.com

FOR THE VIDEOGRAPHER:
Mr. John Franks

ALSO PRESENT:
Ms. Monica Rial

CSI GLOBAL DEPOSITION SERVICES
972-719-5000

DEPOSITION OF RONALD TOYE
June 27, 2019

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REQUESTED DOCUMENTS/INFORMATION

NO. DESCRIPTION PAGE
NONE .....

CERTIFIED QUESTIONS

NO. PAGE/LINE
NONE .....

*XXXX identifies redacted names in the transcript per confidentiality stipulation

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DEPOSITION OF RONALD TOYE
June 27, 2019

THE VIDEOGRAPHER: And we're going on the record in the videotaped deposition of Mr. Ronald Toye. Today's date is June 27, 2019. The time is 9:28 a.m. At this time will counsel please state their appearances for the record, and then the court reporter will swear in the witness.

MR. BEARD: Ty Beard appearing for Victor Mignogna.

MR. ERICK: Casey Erick here for Ron Toye and Monica Rial.

MR. JOHNSON: Sam Johnson for Defendant Jamie Marchi.

MR. VOLNEY: John Volney for Funimation.

MS. CHRISTIE: Carey Christie for Victor Mignogna.

MR. ERICK: Defendants have the same agreement, that one objection applies to all defendants. And we also want to confirm on the record that the confidentiality agreement made yesterday during Mr. Mignogna's deposition remains in effect subject to the court's ruling today, this morning, regarding the affidavits produced June 26 by Defendants Monica Rial and Ron Toye in their supplemental -- I'm sorry, in their amended responses to disclosures.

MR. BEARD: Yes, I agree.

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Counsel, do y'all agree?
MR. VOLNEY: Yes.
MR. BEARD: Sam?
MR. JOHNSON: Oh, I'm sorry.
MR. ERICK: Do you agree?
MR. JOHNSON: With what?
MR. ERICK: What I just said.
MR. JOHNSON: Yes, agreed.
MR. BEARD: Okay. Turn your wallet over to him.
(Oath administered.)
THE REPORTER: Will this be taken under the Texas Rules of Civil Procedure?
MR. ERICK: Yes.
MR. BEARD: Yes.
MR. JOHNSON: Yes.
MS. CHRISTIE: Yes.
MR. VOLNEY: Yes.

RONALD TOYE,

having been first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. BEARD:

Q. Mr. Toye, I'm Ty Beard. I represent Victor Mignogna in this case; he's the Plaintiff.
Have you ever been deposed before?

A. Yes.
Q. Okay. So you're familiar with the process, basically?
A. Somewhat, yes.
Q. Okay. Let's go over it just to be sure. The ground rules are pretty simple. I'll ask questions and you'll answer. And if you would, don't interrupt me while I'm asking, just because the court reporter wants to be able to take it all down. If I ask you a question that doesn't make any sense, feel free to say, Can you rephrase that, or, I don't understand. I'll let you answer your question.
There will be objections occasionally. Your counsel may object to form or to privilege. I would suggest that when you hear your client -- your counsel object, you stop talking. But objections to form, generally speaking, you still have to answer. We just get it recorded.
I may object to nonresponsive. That's really a technical thing. I'm not, you know, trying to offend you or anything. But we -- as Sam said yesterday, we have to control the -- the dialogue. But feel free to answer completely, any question that I ask. If I ask it unfairly, such as, Do you still beat your wife? It's okay to say, I don't beat my wife, you know.

Do you have any questions?
A. Nope.
Q. Okay.
I think the court reporter asks that. Do you ask about reading and signing the deposition?
THE REPORTER: You have the opportunity to read and sign your transcript after it's over.
MR. ERICK: He'll -- yes, we agree to that. He'll read and sign. Thank you.
THE REPORTER: Thank you.
Q. (BY MR. BEARD) Mr. Toye, what's your full name?
A. Ronald Joseph Toye, III.
Q. Are you the fiancee of Monica Rial?
A. Yes.
Q. Mr. Toye, would you agree with this proposition, that someone accused of a crime should be allowed to defend themselves?
A. Yes.
Q. Okay. So what kind of defense would you agree they should be allowed to put on?
MR. ERICK: Objection, form.
A. One that respects whatever state they live in and the codes that go along with that.
Q. (BY MR. BEARD) Okay. Well, let's -- are you a

pedophile?
A. No.
Q. Okay. Forgive me. Your tone indicated a certain degree of indignation when I asked that question; is that fair?
MR. ERICK: Objection. Don't answer that.
MR. BEARD: What is the objection, Counsel?
MR. ERICK: Any answer he gives would be misleading, and it's a harassing question.
MR. BEARD: That's not a proper objection.
Q. (BY MR. BEARD) Does it offend you if someone were to call you a pedophile?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) You can answer.
MR. ERICK: You can answer.
A. Does it offend me -- can you repeat your question?
Q. (BY MR. BEARD) If someone were to call you a pedophile, would it offend you?
A. It would offend me, yes.
Q. Why?
MR. ERICK: Objection, form.
A. Because it isn't true.
Q. (BY MR. BEARD) Okay. Should you lose your job if someone calls you a pedophile?

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MR. ERICK: Objection, form.

A. If there's evidence to it, then I absolutely believe it.

Q. (BY MR. BEARD) Fair enough. But what if there's no evidence? What if somebody just simply says, Ronald Toye is a pedophile, should -- should you lose your job because of that?

MR. ERICK: Objection, form. Calls for speculation.

A. Could you repeat your question?

MR. BEARD: Not a proper objection, Counsel.

Q. (BY MR. BEARD) What if there's no evidence, someone simply says, Ronald Toye is a pedophile? In that case --

A. Sure.

Q. It's a complicated question --

A. Right, it's a multi-question.

Q. Yeah. If someone says, Ronald Toye is a pedophile, and produces no evidence other than that allegation, should you lose your job?

MR. ERICK: Objection, form.

A. The -- part of that question is, if it's a random person who says it, there's no corroborated evidence, and evidence may be a testimony that's outside

of a random stranger, and -- and a company investigates to their ability to look into the claim, then if the employer deems it necessary, then, sure, then it would be appropriate for an employer to fire that person.

Q. (BY MR. BEARD) Okay. I didn't mention a company, though. I'm simply asking --

A. You said a job.

Q. -- a pretty simple question.

A. -- so usually a job --

Q. Oh, you're talking about --

A. -- is associated with a company.

Q. -- your company that employs you?

A. Well, you had mentioned, if a person.

Q. Fair enough.

A. So I said -- I'm answering the question you asked, If a company or a job fired a person, would that be okay.

So I'm assuming when you say job, I can also make the assumption that a company would be attached to the job.

Q. So if I'm -- and I don't want to put words in your mouth.

A. Sure.

Q. So if your company investigates and fires you as a result of these allegations, that's fair?

MR. ERICK: Objection, form.

A. Right. So if they did their investigation and they did this, and we're talking about me, or let's say a hypothetical person, right?

Q. (BY MR. BEARD) No, no, we're talking about you.

A. Well, for me, if there was claims that were substantiated and other people had come through, and a company investigated, there's no reason to doubt that company's integrity, so, yeah, that would be fair.

Q. Okay. So the company should -- no reason to doubt the company's integrity, is what you're saying, that you presume that their investigation is totally fair?

A. Correct.

Q. Okay. I don't -- I don't want to put words in your mouth.

A. I think it's fair for a company.

Q. Okay. You said that if the evidence was corroborated.

A. Mm-hmm.

Q. Could you give me some examples of corroborating evidence --

A. Sure.

Q. -- that you think would be corroborating?

A. Multiple people saying the same story, same account of what happened.

Q. Okay. So if two people call you a pedophile, should you lose your job?

MR. ERICK: Objection, form.

A. If the company did the investigation and they deemed it ready for two people, absolutely.

Q. (BY MR. BEARD) All it takes is two people --

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) -- and a -- and a company investigation --

MR. ERICK: Same objection.

Q. (BY MR. BEARD) -- and you should lose your job?

MR. ERICK: Objection, form.

A. A person who is accused of those things, and two people say it to a company, a company should have the right to make a determination if that's the type of person they want to employ, yeah. Or a contract.

Q. (BY MR. BEARD) What if the company's investigation isn't fair --

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) -- do you still think that you should lose your job?

MR. ERICK: Objection, form.

A. The company is in a position to make a

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decision, what's best for the company.
MR. BEARD: Okay. That's nonresponsive.
Objection, nonresponsive.
Q. (BY MR. BEARD) If the company's investigation is not fair, as you've defined the word fair --
A. Sure.
Q. -- is it reasonable that you would, then, lose your job, merely because two people accuse you of being a pedophile?
MR. ERICK: Objection, form.
A. Yes, it's fair.
Q. (BY MR. BEARD) It's fair?
A. It's absolutely fair.
Q. Okay. So whatever the company wants to do --
A. Correct.
Q. -- is okay with you?
MR. ERICK: Objection, form.
A. As long as there's been an investigation to whatever matter, then, yes.
Q. (BY MR. BEARD) I'm curious. What would you define as an investigation?
A. Somebody asking another --
MR. ERICK: Objection, sidebar. Objection, form.
MR. BEARD: Sidebar is not a proper --

THE REPORTER: You need to answer that again. And let him --
THE WITNESS: Sorry.
THE REPORTER: -- when he starts objecting, let him -- before you answer.
THE WITNESS: Sorry.
THE REPORTER: Thank you. So say your answer again.
A. Yes, it's fair.
Q. (BY MR. BEARD) Okay.
MR. BEARD: Counsel, I'm entitled to ask you, what -- what was the sidebar objection?
MR. ERICK: The curious -- your comment about how -- how you were curious about his answer.
MR. BEARD: I am curious about his answer.
MR. ERICK: I made an objection about it.
MR. BEARD: Okay. Fair enough, I guess.
MR. ERICK: Great.
Q. (BY MR. BEARD) Now, back to the question. I'll repeat it. What do you consider a fair -- a fair investigation to look like?
MR. ERICK: Objection, form.
A. A person that has been trusted with a position to overview a company's policy, to then talk to other people involved in the company and make a determination

what's best for the company and their brand, that's a fair investigation to me.
Q. (BY MR. BEARD) Is it possible that person could be wrong?
MR. ERICK: Objection, form.
A. You know what, this isn't -- the question isn't about if it's wrong or fair. Is it fair --
Q. (BY MR. BEARD) Mr. Toye, I get to ask the questions.
A. Right, but --
Q. Please answer my question.
A. -- I get to answer it, and you can object however you'd like, but that's how I'm answering the question.
Q. Mr. Toye, that's nonresponsive.
MR. BEARD: I'm going to object to that.
A. Cool. And I answered the question.
Q. (BY MR. BEARD) I'll ask the question again.
A. Sure.
Q. Is it possible that an investigator for a company could make a mistake?
MR. ERICK: Objection, form.
A. That's not for me to decide. I'm not the company person.
MR. BEARD: Objection, nonresponsive.

A. Cool.
Q. (BY MR. BEARD) Okay. Is it possible that the company representative might collude with third parties to attack the person -- to attack you in this hypothetical? Is that possible?
MR. ERICK: Objection, form.
A. There's a lot of hypotheticals that could possibly happen in the universe, but in this situation I feel like people who make it to a position where they can make a determination for a company's brand probably wouldn't do that.
Q. (BY MR. BEARD) Okay. I didn't ask if they would probably do that, Mr. Toye.
A. You did say --
Q. I'm asking a very simple question.
A. -- collude together is a probable --
Q. Is it possible --
A. Sure.
Q. -- that an investigator could collude with -- with your accuser and find you guilty of being a pedophile, and fire you?
MR. ERICK: Objection, form.
A. That's assuming a lot about a company.
Q. (BY MR. BEARD) I know, but I need an answer to my question.

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A. No.
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) It's not possible?
MR. ERICK: Objection, form.
A. In my opinion, no.
Q. (BY MR. BEARD) There is no -- I just want to be real sure here. I'm not badging you. I just want to be --
A. Sure.
Q. -- sure I understand you.
If I -- is this a fair statement of what you're saying, it is not possible for an investigator in a company to collude with an accuser of an employee?
MR. ERICK: Objection, form.
A. Well, you're saying in a -- in a whole grand scheme of the thing, there's a possibility that it could happen, yes.
Q. (BY MR. BEARD) Okay. So there is a possibility, then?
A. Would you call collusion people gathering evidence to corroborate a story?
Q. I get to ask -- I get to answer [sic] the questions, Mr. Toye.
A. Well, I'm trying to help define it, yeah.
MR. ERICK: Let's just --

Q. (BY MR. BEARD) I get to ask the questions.
MR. ERICK: Let's -- question, answer, question, answer.
Q. (BY MR. BEARD) So if it's possible, then, that -- if I'm hearing you right.
A. Sure.
Q. If it's possible that an investigator for a company could collude with an accuser, and therefore find you guilty -- and I'm going to use that -- I'm putting that word in air quotes for the court reporter, understanding it's just a colloquial term.
A. Mm-hmm.
Q. If that's possible, is that -- is that a fair outcome, in your opinion?
MR. ERICK: Objection, form.
A. Again, in my opinion, if a company did their investigation, then, yes --
MR. BEARD: Objection, nonresponsive.
A. -- it's fair.
Q. (BY MR. BEARD) You're not -- okay.
A. I did answer, it is fair.
MR. ERICK: Everyone, let each other finish.
MR. BEARD: Fair enough.
MR. ERICK: All right?

MR. BEARD: Fair enough.
MR. ERICK: And then --
MR. BEARD: Fair enough.
MR. ERICK: All right.
Q. (BY MR. BEARD) If my questions are unclear, feel free to ask for me to restate them.
A. Sure.
Q. I'll be happy to do so.
So just to be sure, if I understood you, you said it's possible that an investigator could collude with an accuser and find you, quote, guilty, unquote, of the accusation, and you think that's a fair outcome?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) Answer the question.
A. Yes, I do think that's fair.
Q. You think that's fair?
A. Yes.
Q. Okay. What if there is no -- what if there's investigation and someone just accuses you of being a pedophile, should you lose your job?
MR. ERICK: Objection, form.
A. Does the company -- well, no.
Q. (BY MR. BEARD) What if two people accuse you of being a pedophile, but the company doesn't conduct an

investigation into it and they just fire you out of hand, is that fair?
MR. ERICK: Objection, form.
A. Can you clarify or make that sentence a little bit smaller so I can answer it directly?
Q. (BY MR. BEARD) I'll try.
A. Sure.
Q. If two people accuse you of being a pedophile, and you're not -- please understand, I'm not accusing you of anything in these questions.
A. Mm-hmm.
Q. These are hypotheticals.
If two people accuse you of being a pedophile, and your company doesn't conduct an investigation but just fires you out of hand, is that fair?
A. No.
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) No?
A. If they do not do an investigation and just fire you, then, no.
Q. Okay. What if four people accuse you of being a pedophile and they do not do an investigation?
A. If they do not --
MR. ERICK: Objection, form. Sorry.

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MR. BEARD: Let me get it all out so it will read right.

Q. (BY MR. BEARD) What if four people accuse you of being a pedophile, and the company doesn't do an investigation and they fire you, is that a fair outcome?

MR. ERICK: Objection, form.

A. If the company doesn't hear about it or do an investigation and you're fired?

Q. (BY MR. BEARD) Okay.

A. Then, no.

Q. Let me try again. I didn't say anything about the company not hearing about it.

If four people accuse you of being a pedophile --

A. Uh-huh.

Q. -- and the company does not conduct an investigation, but simply fires you, is that a fair outcome?

A. Yes.

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) That's fair?

A. If they hear about it, yes.

Q. Okay. What if the only way they heard about it, in this last hypothetical, is that your accusers contacted them privately and told them, is that still a

fair outcome?

MR. ERICK: Objection, form.

A. Yes.

Q. (BY MR. BEARD) Fair outcome?

A. Absolutely fair.

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Okay. If you're accused of being a pedophile, would you not naturally want to defend yourself from those accusations?

MR. ERICK: Objection, form.

A. Can you say that again?

Q. (BY MR. BEARD) Would you want to defend yourself if someone accused you being a pedophile?

MR. ERICK: Objection, form.

A. Yes.

Q. (BY MR. BEARD) Okay. Let's walk down a little hypothetical with me. Let's say someone tweets out that you are a pedophile.

A. Uh-huh.

Q. What -- what would you think you would typically do in response?

A. I would ignore that.

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Let's say that -- okay. Let's say that thousands of people see that tweet --

A. Uh-huh.

Q. -- and start commenting on it, what would you do?

MR. ERICK: Objection, form.

A. I would ignore it.

Q. (BY MR. BEARD) So you've ignored -- when you've been accused of things in the past, have you ignored it and never commented on it?

MR. ERICK: Objection, form.

A. Depends. Sometimes.

Q. (BY MR. BEARD) Well, what accusation would you feel strongly enough that you would defend yourself on?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) What accusation would be made?

MR. ERICK: Objection, form.

A. If it wasn't a -- can you repeat your question? Sorry.

Q. (BY MR. BEARD) Yeah. That was a -- that was a poor way of phrasing it.

You just said that it depends on the accusation, right?

A. Correct.

Q. Did I hear that correctly? Okay.

What accusations -- give me some examples rather -- strike that.

Give me examples of accusations that would move you to defend yourself publicly.

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Well, I mean, you said ped -- being accused of a pedophile wouldn't.

A. Right.

Q. Okay. What if you were accused of being a murderer, would that -- would that induce you to defend yourself?

MR. ERICK: Objection, form.

A. Nope.

Q. (BY MR. BEARD) Well, you said it depends on the accusation. I'm asking you to give me an example of an accusation that would move you to defend.

A. I'm not sure. It would depend on the moment, so I'm not sure.

Q. Okay. Okay. Fair enough.

Have you ever heard of the term due process?

A. I believe so.

Q. Okay. What do you think it means?

A. Giving a person an allotted opportunity to do something or the appropriate process for something.

Q. Okay. If someone is accused of something

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horrible, would you agree that the term due process means they get to defend themselves from that accusation?

MR. ERICK: Objection, form.

A. Yes.

Q. (BY MR. BEARD) Okay. Should they be allowed to question their accusers?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) The per -- let me clarify that.

A person accused of, say, pedophilia, let's just use that as an example, should they be allowed to question those who accuse them?

MR. ERICK: Object to form.

A. I don't think a person who's accused of hurting a child should question that child, so, no.

Pedophilia is abusing a child, if I'm not mistaken, correct?

Q. (BY MR. BEARD) Right. But what if the accuser is not a child? What if the accuser is an adult who says, I saw him molest a child? Should the accused be allowed to question the person that said, I saw him abuse a child?

MR. ERICK: Objection, form.

A. If they follow what you said the due process is the correct way.

Q. (BY MR. BEARD) No. I'm simply asking if you think -- is your personal opinion, do you think someone accused of pedophilia by a third party should be allowed to question the person who accuses him?

MR. ERICK: Objection, form.

A. With due process.

Q. (BY MR. BEARD) Well, what does that mean exactly?

A. With the correct and appropriate way to question a person who accused you of something.

Q. What do you think the correct and appropriate way is?

A. With respect.

Q. Respect. If I say that accuser is -- let's say that you were accused of being a pedophile, and you say, That's a lie, is that respect?

MR. ERICK: Objection, form.

A. The way you said it?

Q. (BY MR. BEARD) By your definition. By your definition.

Sure.

A. In that tone?

Q. No. I write it out. I write, That's a lie.

MR. ERICK: Objection, form.

A. No.

Q. (BY MR. BEARD) That's not respectful?

A. What forum?

Q. I tweet it out. Are you -- I'm sorry, in the hypothetical, you tweet it out.

A. Right. Yes.

Q. You tweet out, That accusation is a lie.

A. Yes.

Q. Is that a respectful response?

A. Yes, that's -- that is respectful.

Q. Can you think of an example of a response that wouldn't be respectful?

MR. ERICK: Objection, form.

A. Yes.

Q. (BY MR. BEARD) What would that be?

A. I would say one that calls for harassment of the person, or intimidating. Maybe also trying to damage their -- the other person's reputation in any way.

Q. Okay. Can you give me an example of harassment?

A. Yes. Let's say you -- this person should be beaten within an inch of their life.

Q. The accuser?

A. Correct.

Q. Okay. Another example?

A. Sure. This person better wear a bulletproof vest to their next convention, would be one.

Q. Okay. How about, This person is making this up, I didn't do it and he's a liar, is that respectful?

MR. ERICK: Objection, form.

A. That is respectful.

Q. (BY MR. BEARD) Okay. What if he says it in a video in the tone that I just said it --

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) -- is that respectful?

MR. ERICK: Objection, form.

A. Can you repeat your question?

Q. (BY MR. BEARD) Sure. What about, That person is a liar, I didn't do it, and he is making it up, in that tone that I just described?

A. Sure, yeah.

Q. Is that respectful?

A. Seems decent.

Q. Not an attack?

A. That doesn't sound like an attack.

Q. Okay. Okay. So if I'm understanding what you're saying, and again, I don't want to put words in your mouth, you're saying that merely disagreeing is not harassment or an attack -- rephrase that. Sorry. I am -- I am putting words in your mouth. Let me not do

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that.

Disagreement --

A. Uh-huh.

Q. -- is disagreement harassment?

A. Depends.

Q. Okay. Let's say that you say, I think Donald Trump's wonderful, and I say, I disagree.

A. Uh-huh.

Q. Is that harassment?

MR. ERICK: Objection, form.

A. If that's the only thing you say to me?

Q. (BY MR. BEARD) Yeah.

A. No.

Q. I say, I really disagree. Is that harassment?

MR. ERICK: Objection, form.

A. No.

Q. (BY MR. BEARD) I say, You know, only an idiot would vote for Donald Trump. Is that harassment?

MR. ERICK: Objection, form.

A. And it's just you?

Q. (BY MR. BEARD) For now -- yeah, for now, it's just --

A. No.

Q. -- just between us?

A. No.

Q. Okay. Same set of facts, except we're doing it publicly on Twitter and thousands of people are reading the tweets. Is that harassment?

MR. ERICK: Objection, form.

A. Could be.

Q. (BY MR. BEARD) Why?

MR. ERICK: Objection, form.

A. Depends on what the people are saying underneath it.

Q. (BY MR. BEARD) Oh, I see. So if I'm hearing you correctly, when I say, Only an idiot votes for Trump, it's harassment if somebody else then does what?

MR. ERICK: Hold on.

Objection, form.

All right. Can you do that again? I don't -- I don't follow the question.

MR. BEARD: Okay.

MR. ERICK: Before I tell him not to answer, maybe --

MR. BEARD: That's fine. That's fine. Because we're going to be doing this all day so we might as well get it out.

Q. (BY MR. BEARD) If I heard you correctly -- and, again, I don't want to put words in your mouth. If I heard you correctly, you seemed to say to me that

whether or not the statement, 'Only an idiot would vote for Trump' is harassment, depends on what third parties do?

A. No --

MR. ERICK: Object.

A. -- not necessarily.

Q. (BY MR. BEARD) Okay. Okay. Then please tell me how you think that statement could be harassment.

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Let me ask the question. Does that change your answer, that it could be harassment?

A. Could be, but I'm not sure.

Q. Okay. Could be, couldn't be.

A. Just depends.

Q. Depends on what?

A. I'm not sure. It's hypothetical.

Q. I understand. But what does it depend on?

A. I'm not sure.

Q. Okay. If you were accused of being a pedophile -- and all these hypotheticals, I'm presuming that that accusation is not true.

A. Okay.

Q. Let's -- let's get that career -- clear. If you were accused of being a pedophile publicly, and your

company did an investigation and fired you, okay?

A. Uh-huh.

Q. Should you be not allowed to make a living in your industry that you work in again?

MR. ERICK: Objection, form.

A. It's not my determination or my ability to make that call.

Q. (BY MR. BEARD) Would it be fair -- as you define the term fair --

A. Uh-huh.

Q. -- would it be fair for you to be punished in such a way that you could not make a living in -- in your industry that you currently work in?

MR. ERICK: Objection, form.

A. If the industry didn't want me in that industry --

MR. ERICK: Hold on, hold on, hold on.

A. -- then, yes, it's fair.

MR. ERICK: Objection, form.

MR. BEARD: That's fine. That's fine.

Q. (BY MR. BEARD) What if other companies did want you to work for them but were too afraid of the publicity backlash and refused to hire you, would -- do you think that would be fair?

MR. ERICK: Objection, form.

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A. Yes.
Q. (BY MR. BEARD) You think that would be totally fair?
A. Yes.
Q. Okay. Is it reasonable for someone -- scratch that.
Is it fair for someone to accuse you of being a pedophile when they have no actual knowledge, i.e., they didn't see it?
MR. ERICK: Objection, form.
A. What's interesting about that, what you're saying, is, with pedophilia, I'm -- I'm going to make an assumption that it's probably not done in public and the child didn't have a camera on them.
Q. (BY MR. BEARD) Okay.
A. So I don't know how hard I would dig into a -- that situation.
Q. If you were accused of being a pedophile you don't think you would dig into the nature of the accusation; is that --
MR. ERICK: Objection, form.
A. Again, because if you're asking me as a person, and I know I didn't do that, no, I wouldn't dig into it.
Q. (BY MR. BEARD) Even though hypothetically you could lose your job and not be able to make a living in

your business, you would not dig into it; is that what you're saying?
MR. ERICK: Objection, form.
A. With that person.
Q. (BY MR. BEARD) What person?
A. The person that is accusing me, or the company.
Q. Okay. Okay. What if 30 people accuse you of being a pedophile, and the company just fires you and there's no investigation, is that okay?
A. Absolutely.
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) Okay.
THE WITNESS: Oh, I'm sorry.
MR. ERICK: Yeah. That's all right.
Q. (BY MR. BEARD) Okay. Let's shift to another thing entirely.
A. Uh-huh.
Q. Are there any health issues preventing you from testifying fully and truthfully in this deposition?
A. No.
Q. Are you taking any medications that might affect your memory or your ability to testify today?
A. No.
Q. Other than your attorney, did you meet with anyone to prepare for this deposition?

A. No.
Q. Have you met with any witnesses in this case to prepare for this deposition?
A. No.
Q. Okay. Did you review any documents to prepare for this deposition?
A. No.
Q. What do you do for a living, Mr. Toye?
A. I'm a loan officer.
Q. What company do you work for?
A. Mid America Mortgage now.
Q. Are you an employee or an owner?
A. I'm an employee.
Q. Is Mid America a franchisee? In other words, do they franchise with a national company?
A. So Mid America is the umbrella, and then there's branches within it, but I work for Mid America.
Q. Okay. Are you employed by an individual branch of Mid America?
A. It's employed by Mid America.
Q. Okay. Okay. So the branch you work for is owned and part of Mid America?
A. Correct.
Q. Okay. I was just trying to figure that out. I went to --

A. Yeah.
Q. -- their website, and I couldn't sort that out.
What's your Twitter name or handle?
A. I'm not sure. I think it's --
Q. What's your Twitter handle? Excuse me.
A. I'm not sure. I think it's rontoye or rontoye3.
Q. Is your Twitter handle rontoye?
A. That sounds right, maybe.
Q. Okay. Do you have your phone with you?
A. No.
Q. Okay. I got to put my phone in evidence, but I'll just show this.
MR. ERICK: We're going to look at your phone?
MR. BEARD: I'm going to flash a screenshot.
MR. ERICK: All right. Well, then let's make it an exhibit, then.
MR. BEARD: Seriously?
MR. ERICK: Well, yeah. If we're going to ask witnesses that the entire --
MR. BEARD: Okay. Never mind.
MR. ERICK: Well, I just -- if we're going to ask questions --

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(Exhibit 28 marked.)

Q. (BY MR. BEARD) I'm going to hand you what's been marked as Exhibit 28. We'll do it the hard way.

MR. BEARD: I apologize to John --

MR. ERICK: Thank you.

MR. BEARD: -- and Sam. We didn't print binders out for you guys.

Q. (BY MR. BEARD) Okay. Would you flip to the very first page.

A. Yes.

Q. Would you read the first line of text.

A. rontoye@rontoye, Jan 23.

Q. Okay. Go ahead and read, if you would, this -- this entire text here.

A. Sure.

Replying to RWBY, underscore, fan1 -- or 10000 @kenthecaden and @marzsgirl. Also, to clarify, I don't feel, nor do they feel, he hurt them, he actually hurt them.

Q. Okay. Did you post that tweet?

A. Looks like I did.

Q. I'm just asking if you did.

A. Looks like I did.

Q. Do you remember making this tweet?

A. I don't remember, but --

Q. Okay. But it looks like --

A. Yes.

Q. -- something you would have sent out?

Okay. What is the Twitter handle on this page?

A. Which one? There's a few.

Q. Well, I'm sorry. On the first line.

A. rontoye.

Q. @rontoye --

A. Yes.

Q. -- the ampersand --

A. Yes.

Q. -- rontoye?

A. Ampersand, rontoye.

Q. Okay. Okay. So does that refresh your recollection about what your Twitter handle --

A. Yes.

Q. -- is?

And what is it?

A. rontoye.

Q. Thank you. All right. Just hang onto that.

A. Sure.

Q. We'll be using it later.

A. I appreciate it.

Q. Who's paying your leg -- the legal fees that

you're incurring for this case?

A. Monica and I.

Q. Okay. Is Funimation, in any way, directly or indirectly, paying your legal expenses?

A. No.

Q. Okay. Let's see. Do you have any other social media accounts besides Twitter?

A. I'm not sure.

Q. Do you have --

A. Facebook.

Q. -- a Facebook account?

A. Yeah.

Q. Okay.

A. And an Instagram.

Q. And Instagram?

A. Yes, sir.

Q. Snapchat?

A. Yes.

Q. Are there any other social medial accounts you can think of?

A. Oh, God. I'm not sure at this time.

Q. On your Facebook account, have you commented on -- about Vic -- Victor Mignogna?

MR. ERICK: Objection to the form.

A. I can't remember if I have or haven't.

Q. (BY MR. BEARD) Okay. Because I don't know what Instagram is, I'll ask the same question with regards --

A. Sure.

Q. -- to Instagram.

Have you commented about Victor Mignogna on Instagram?

A. I'm not sure.

Q. Okay. Have you discussed Victor Mignogna on any other electronic platforms besides Twitter?

A. I can't remember. I'm not sure.

Q. Do you remember posting about Victor Mignogna on any platform besides Twitter?

A. No. I can't remember.

Q. Okay.

A. It's possible.

Q. Okay. I'm not trying to trap you --

A. Sure.

Q. -- I'm just trying to get --

A. I'm not worried about that.

Q. -- the -- did you tweet -- scratch that.

Okay. When I say tweet, I mean did you post a tweet on your plitter -- on your Twitter account, @rontoye? Can we agree that that's what I'm referring to?

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Did you ever tweet that there was an investigation being conducted by Funimation about Mr. Mignogna's alleged allegations of sexual misconduct?

A. I'm not sure.

Q. You're not sure?

A. I'm not sure.

Q. You have no memory of that?

A. I'm not sure.

Q. Okay. Do you know if there was an investigation of Victor Mignogna --

A. I know that --

Q. -- about -- let me just finish. I'm not trying to cut you off -- about the sexual allega -- the sexual misconduct allegations that have been made?

A. Can you repeat your question again?

Q. Sure. Do you know if there was an investigation by Funimation of Victor Mignogna with regards to the allegations of sexual misconduct that have come out this year?

A. I know they spoke to Monica.

Q. Funimation --

A. Correct.

Q. -- spoke to Monica?

How do you know that?

A. Because she is my fiancee.

Q. She told you?

A. Yes.

Q. Is that correct?

A. Yes.

Q. Okay. When did she tell you about --

A. I don't remember.

Q. -- about that?

A month ago?

A. I'm not sure.

Q. What I'm asking is, was it more than a month ago?

A. I'm not sure.

Q. Okay. Have you had any communication with anyone associated with Funimation about Victor Mignogna?

A. I'm not sure.

Q. Really?

A. Uh-huh.

Q. Okay. Can you name the people -- well, do you know people at Funimation, who work at Funimation --

A. Define --

Q. -- besides Monica?

A. Define what you mean by work.

Q. People who have been employed by Funimation to do anything like voice acting or an administrative capacity or any kind of business capacity, either

whether as a contractor or -- as an independent contractor or as a W-2 employee?

A. Right. So as a contractor, I know a few contractors --

Q. Okay. Who --

A. -- that work for them.

Q. Who all do you know?

A. A know Monica.

Q. Okay.

A. And a few others.

Q. Would you please list them.

A. Sure. Vic, Chris.

Q. Chris who?

A. Sabat.

Q. Okay.

A. Ian.

Q. Ian who?

A. Sinclair.

Q. Please give me the last name, if you will.

A. Sure.

Jamie Marchi. Those are the people that I know.

Q. Those are the only people who are associated with Funimation that you know?

A. Well, I --

Q. That's a question. Sorry.

A. Right. I know there -- I know of other people, but are you saying know in a friend capacity or --

Q. Sure. I mean, you know --

A. Sure.

Q. -- people that -- people that you have talked to, I mean --

A. Oh, talked to?

Q. Yeah. Yeah. You can limit it to that.

A. Sure. I'll have to think.

Mike McFarland, Colleen Clinkenbeard.

Q. Hold on. MacFarlane, L-A-N-E?

A. (Witness shrugs.)

Q. Don't know. Okay.

Colleen Clinkenbeard? Is that with a C?

A. I would wing it.

Q. Don't know.

A. I have no idea.

Q. Okay. Fair enough.

Who else?

A. That's, that I -- I can think of right now.

Q. Okay. Have you dis -- have you had any conversations with Chris Sabat about Victor Mignogna?

A. Yes.

Q. Okay. What did you say in those conversations?

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A. I can't remember.
Q. Did they discuss Mr. Mignogna in a positive way?
A. I can't remember.
Q. Really? Did Mr. Sabat say anything about Mr. Mignogna?
A. I can't remember.
Q. Okay. Have you had any conversations with Ian Sinclair about Victor Mignogna?
A. Yes.
Q. What did you say in those conversations?
A. I can't remember.
Q. Okay. What did Mr. Sinclair say about Mr. Mignogna?
A. I can't remember.
Q. Okay. Did you have any conversations with Jamie Marchi about Victor Mignogna?
A. Yes.
Q. And what did you say?
A. I cannot remember everything.
Q. Well, tell me some of the things you can remember, if you can remember anything.
A. Vic's name.
Q. That's it?
A. Uh-huh.

Q. In any of these conversations with Sinclair or Marchi, do you recall if the conversations were -- were positive about Mr. Mignogna? In other words, did you say nice things about him?
A. I can't remember.
Q. Okay. And you can't remember what they said in response?
A. Right.
Q. Okay. Mr. McFarland, did you discuss Mr. Mignogna with him?
A. I cannot remember.
Q. Okay. Can -- can you remember if you characterized him in a positive way in that conversation?
A. No.
Q. Okay. Can you remember if Mr. --
A. I don't remember talking to him about it.
Q. I'm sorry?
A. I don't remember talking to him about Vic at all.
Q. Okay. Okay. Okay. Just to be clear, you are saying that you did talk to Sabat, Sinclair, and Marchi, you just don't remember the contents of the conversation?
A. Correct. He's come up in conversation.

Q. Sure. But McFarland, you don't remember ever having a conversation with?
A. Correct.
Q. Okay. Colleen Clinkenbeard, have you had any conversations with her about Victor Mignogna?
A. He's come up in conversation.
Q. Okay. Do you recall what you said?
A. No.
Q. Do you recall what she said?
A. No.
Q. Okay. With any of the people I just mentioned, Christopher Sabat, Ian Sinclair, Jamie Marchi, Mike McFarland, Colleen Clinkenbeard, have you sent or received text messages from them regarding Victor Mignogna or this case?
A. I can't remember.
Q. Did you turn any such -- any text messages over to your attorney --
A. I can't remember --
Q. -- for discovery?
A. -- but I know I've given them everything that they've asked for.
Q. Do you have any idea if your attorney produced those to us?
A. Nope.

Q. Okay. Fair enough.
Did you exchange emails with any of these people, Sabat, Sinclair, Marchi, McFarland, and Clinkenbeard?
A. Not that I --
Q. I'm sorry. I didn't finish the question. It was my fault -- regarding Victor Mignogna or this case?
A. Not that I can remember.
Q. Okay. Were you -- if you had, you would have turned those over to your attorney; is that correct?
A. Correct.
Q. Okay. Okay.
Oh, I forgot to say --
A. Sure.
Q. -- if you need a break, you can call -- you can ask for it. You have to answer the question, but after that you can call it.
A. Uh-huh.
MR. BEARD: I am going to call a break, if that's okay.
A. Sure.
THE VIDEOGRAPHER: And we're going off the record at 10:09.
(Break taken from 10:10 a.m. to 10:27 a.m.)
THE VIDEOGRAPHER: We're back on the record

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for beginning of disc number 2. The time is 10:27.

Q. (BY MR. BEARD) Mr. Toye, what's your education back -- could you describe your education for us.

A. Yes. I went to my -- I went to school.

Q. Post high school, if any.

A. Sure. I went to Dallas Baptist University.

Q. Okay. Did you get a degree from --

A. I didn't finish my four year -- close, but didn't finish.

Q. Any other -- any degrees or anything like that that you -- have you -- have you --

A. Obtained.

Q. Scratch that.

Have you attained any other degrees?

A. No.

Q. Okay. Okay. Have you ever been arrested or convicted of a crime?

A. Yes, I've been arrested before.

Q. What for?

A. When I was younger, I wrote a check that bounced, that I had no idea about, and they picked me up on some, like, thing where you write a check, and I paid for it and got it covered.

Q. Okay. Other than traffic offenses, though, nothing else?

A. No.

Q. Okay. Have you engaged in any other prior lawsuits?

A. Yes.

Q. Okay. Describe them, please.

A. It was a few years ago, so I don't know all the details, but an apartment that we lived in had black mold, and we sued them.

Q. Okay. How long ago?

A. I can't remember the exact date. Four years, five years. Four to five years.

Q. Okay. What was the resolution of that case?

A. They gave us a big check.

Q. Y'all settled?

A. Yes. They settled with us.

Q. Oh, they settled, okay.

Okay. Have you been married before?

A. Yes.

Q. Okay. And are you divorced?

A. Yes.

Q. Okay. When was the divorce?

A. I can't remember the exact date, but --

Q. Approximately.

A. Six, seven years ago.

Q. Do you have any history of drug or alcohol --

A. No.

Q. -- abuse? Okay.

Are you a smoker?

A. No.

Q. Tell me, again, your employer. I didn't write that down.

A. Mid America Mortgage.

Q. Mid America Mortgage. Okay.

How long have you worked there?

A. Just started about a week and a half ago, maybe two.

Q. Where did you work before Mid America Mortgage?

A. Fairway Mortgage.

Q. What did you do for them?

A. Sure. I was a loan officer and operations manager.

Q. Were you an owner of Fairway Mortgage?

A. Not at all.

Q. What does a loan officer do?

A. He instructs clients on purchasing a residential mortgage.

Q. Okay.

A. Or obtaining a residential mortgage.

Q. Okay. What was the other thing that you said you did?

A. Operations manager.

Q. What does an ops mana -- operations manager do?

A. Make sure the loans close.

Q. How long did you work at Fairway Mortgage?

A. Around three years.

Q. Are you a religious man?

A. Yes.

Q. What denomination?

A. Christian.

Q. Any particular denomination of Christianity?

A. I would say nondenominational.

Q. Okay. Do your religious beliefs have an opinion -- scratch that.

Do your personal religious beliefs have anything to say about telling lies?

A. Yep.

Q. What does it say?

A. It's not good.

Q. Would it be fair to say they say don't do that?

A. It's not a good idea.

Q. Okay. Do you attempt to follow those rules?

A. For the most part, I do my best.

Q. Okay. Okay. Let's go to Exhibit 28.

A. Sure. Is there tabs or a table of index or anything --

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Q. Nope.
A. -- or just flip until I see 28.
Q. No, no. It's -- it's the actual binder itself, that's Exhibit 28.
A. Oh, so this is 28.
MR. BEARD: Counsel, we can do this one of two ways, we can do it fast --
MR. ERICK: Yep.
MR. BEARD: -- in which I'll ask Mr. Toye to simply leaf through it and tell me which tweets he doesn't remember sending, or we can walk through them one at a time.
MR. ERICK: Well, I mean, we probably have to walk through them.
MR. BEARD: Okay.
MR. ERICK: Yeah. I just -- I -- I think we'd just be adding a step to have him go through it and then have you ask about them individually, so --
MR. BEARD: Okay. Let's get to it, then.
MR. ERICK: Yeah. I mean, I wish there was a shortcut. I don't think --
MR. BEARD: Yeah. That's fine. I'm not -- that's fine.
Q. (BY MR. BEARD) Look at page 1, please.
A. Yes, sir.

Q. We just looked at that a moment ago.
A. Uh-huh.
Q. Okay. As I recall, you said you don't remember sending this tweet?
A. Correct.
Q. Okay. Would it be consistent with your personality to have sent this tweet? Strictly an opinion.
MR. ERICK: Objection, form.
A. Could be.
Q. (BY MR. BEARD) Okay. All right. Let's look at page 2. What's the date of that tweet on page 2?
A. January 24th.
Q. Okay. Would you read that tweet, please.
A. Sure. The --
Q. No, no, just -- just read it over, and --
A. Oh.
Q. -- and when you're done, tell me.
A. I'm done.
Q. Okay. Do you recall posting this tweet? Making this tweet. Sorry.
A. I don't recall, but I see it here.
Q. Okay. Read the first line.
A. Ron --
Q. No, I'm sorry. I'm sorry. Read the first line

of text after the header.
A. Okay.
Q. It's the third line on the tweet.
A. Perfect.
They are not false. Four people very close to me have been assaulted by him.
Q. Any idea who him is?
A. Yes. Victor Mignogna.
Q. Okay. Is your memory beginning to clear? Do you remember now, making this tweet?
A. I don't remember making the tweet, but I know exactly who I was speaking about right there.
Q. Okay. Okay. Well, how do you define the word assaulted?
A. Sure. Any action, verbally, physically, emotionally, that asserts themselves in a way that offends or hurts another person.
Q. Okay.
A. Uh-huh.
Q. Anything -- and, again, I'm -- I'm trying to understand the contours --
A. Uh-huh.
Q. -- of what you're saying. Are you saying that anything that offends someone is an assault?
A. If the person felt it was an assault, yes.

Q. Okay. Totally up to the person who heard the statement in this hypothetical?
MR. ERICK: Objection, form.
A. Could be.
Q. (BY MR. BEARD) Well, let me -- let me -- let me -- let me -- let me scratch that. I -- I think I can make it clearer.
Among the types of activities that you defined as an assault, were statements, correct?
A. Could be.
Q. Okay. So are you saying that any statement that offends someone is an assault?
A. No.
MR. ERICK: Object.
A. I didn't say that.
Q. (BY MR. BEARD) Okay. Okay. What -- what is necessary for a statement to be an assault?
A. I'm not sure.
Q. All right. Read the -- on this -- this tweet --
A. Sure.
Q. -- read the -- read the line -- well, it's the fourth line total.
A. Sure.
Didn't know this until a few days ago or

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things would have been much.

Q. Next.

A. Sure.

Different in LA.

Q. Do you have any idea what this sentence means?

A. Yes.

Q. What does it mean?

A. It means things would have been different in L.A.

Q. In what way?

A. I'm not sure.

Q. Okay. Let's look at number three, page 3.

A. Yes, sir.

Q. Did you post the tweet on this page?

A. Looks like I did.

Q. Didn't ask if it looked like you did. Do you remember if you --

A. I do not remember.

Q. Okay. Okay. Okay. Please read the sentence start -- read the whole thing, starting with, I can't speak.

A. I can't speak to all accounts of people who have come forward with their personal experiences with Vic, but I know with 100 percent certainty that he assaulted four people I love. I am sorry to all the

people he has hurt, and I stand with the victims.

Q. Okay. You said you don't remember if you sent this tweet.

A. Correct.

Q. Do you believe that Vic Mignogna assaulted four people that you love?

A. Yes, I do.

Q. Okay. Who are they?

MR. ERICK: Yeah. With this -- I mean, we can't -- this would be under the confidentiality agreement from yesterday, of those four individuals.

MR. BEARD: Oh, yeah, yeah, yeah.

MR. ERICK: So -- okay.

MR. BEARD: Well, I mean, other than the parties, obviously.

MR. ERICK: Right, other than the parties --

MR. BEARD: Yeah, yeah.

MR. ERICK: Correct.

MR. BEARD: No, that's fine.

MR. ERICK: So we'll do the same thing as we did yesterday, that the -- the names will be confidential, redacted.

MR. BEARD: Yeah. I think the deal was we agreed that we would redact anything if we --

MR. ERICK: Well, they'll -- they're confidential. So -- so for the purposes of his answer, we'll go ahead, but at this point these names, if they're not parties, are -- you know, we'll redact them according to our prior agreement.

MR. BEARD: Okay.

Q. (BY MR. BEARD) Who are they, the four people that you think he assaulted?

A. I believe that he assaulted Monica Rial.

Q. Okay.

A. XXXXX XXXX, XXXX XXXX.

Q. Slow down, because I'm writing here very slow.

A. And XXXX XXXXXXXXX.

Q. How do you know that he assaulted Monica Rial?

A. She told me.

Q. Okay. Describe the assault that he conducted on her.

A. What Victor Mignogna had -- how he assaulted Monica was, he invited her up to his room. He then cornered her, grabbed her, kissed her, threw her on a bed, continued to kiss her, and thankfully somebody stopped it by interrupt -- by knocking on the door.

Q. Do you know who that somebody was?

A. I can't remember the name.

Q. Okay. That's fine.

You weren't there to witness any of this, right?

A. I was not there.

Q. Okay. How long ago did this occur?

A. I'm not sure. It didn't happen to me.

Q. Well, how long ago did Monica say it occurred?

A. I think she mentioned 2007.

Q. 2007. Okay.

When did she tell you about this assault?

A. Like, a couple of days before the 24th.

Q. Of January?

A. Uh-huh.

Q. Okay. How long have y'all been dating?

A. Gosh, nearly five years.

Q. And in that five years be -- approximately, before January 24th, she never, one time, mentioned that he assaulted her?

A. She did not.

Q. Have you personally met Vic Mignogna?

A. Yes, I have.

Q. Where was the first place you met him?

A. It was at a convention. I can't remember if -- I think it was one in Florida.

Q. Okay. About how long ago was that?

A. I'm not sure. Two, three years ago.

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Q. Several years maybe?
A. Yeah.
Q. Sure.
A. Maybe one year, two years, somewhere in there.
Q. Okay. A while back?
A. Correct.
Q. Okay. How many -- how many times have you interacted with him socially? And what I mean by that is, anything more than just, Hey, how you doing, kind of stuff?
A. A few times.
Q. More than two?
A. I'm not sure.
Q. More than five?
A. Could be. I'm not sure.
Q. More than 10?
A. I'm not sure.
Q. Okay. Help me understand what "a few" kind of means. Give me a range at least.
A. I'm not sure. A couple.
Q. Okay.
A. A bunch. I'm not sure.
Q. Okay. How do you know -- well, back up.
Describe the assault on XXXXX -- the purported -- I'm going to ask, the purported assault on

XXXXX and XXXX XXXX occurred while they were together; is that correct?
A. Uh-huh, that's correct.
Q. Okay. Describe that, please.
A. Sure. Again, he invited them up to their [sic] room. He began to speak to them about -- asking them -- told them that he'd brought them up there because he didn't want to go to a strip show with their friends. And then he said, I'd rather see you two strip. He then -- they -- he -- then XXXXX said -- or XXXX, I can't remember the exact pert -- part, but they said, You're old enough to be my dad.

And then they became terrified when he got angry and said, I'm not that old. I look like I'm in my forties.

Then Vic -- they continued to go on. And then the girls were terrified because he went from being the nice, charming Vic, to, I -- in their opinion, a monster, and they wanted to leave.

They said they had to leave. Vic said okay, walked with them to the door, grabbed XXXXX, kissed her, and then proceeded to do the same thing to XXXX. And then they got in the elevator and bawled their eyes out.

Q. And that's what they told you; is that correct?

A. That's correct.
Q. You weren't there, of course?
A. I was not there.
Q. Did they tell you why they went to his room?
A. Yes. They were going up there because they thought he was a nice guy, a good Christian guy, and he was going to be nice to them. They had met him a couple of times, always been really sweet. So they thought it would be fine to go up there and have a talk. Wanted to get away from the loudness of the convention.
Q. Do you recall if they -- if he went -- did he give them their add -- scratch that.
Did he give them the room number and then they later came up?
A. I think they went together.
Q. Okay. Can't remember, though?
A. Can't remember.
Q. Okay. When did they tell you this occurred?
A. I can't remember the exact date.
Q. Was it, say, at least two years ago?
A. No.
Q. Okay. Are you --
A. Oh, are you saying when the assault occurred?
Q. Yeah, yeah.
A. Oh, I can't remember the date.

Q. I'm trying to get some idea of the timeline. Was it --
A. I can't --
Q. Was it last week, last month, last year, that kind of thing?
A. I can't remember the day --
Q. Okay.
A. -- or when they said it happened.
Q. Well, when did they tell you about it?
A. Recently, or relatively recently. This year.
Q. About when?
A. I cannot remember.
Q. I'm not trying to trap you, I just --
A. I'm not worried about that.
Q. Say, January maybe?
A. Maybe.
Q. Maybe. Okay. Okay. Certainly not like late last year or anything, it was this year; is that correct?
A. Maybe.
Q. But you can't recall them telling you when this happened?
A. I can't recall when the -- when it happened, when they told me.
Q. Okay.

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A. Yeah.
Q. Okay. How do you know them?
A. They are fans of this industry. Met them at a convention when I was there with Monica. Been really nice. And then developed a relationship.
Q. How long have you known them?
A. Three years, three or four years.
Q. So they didn't tell you about this until sometime this year? That's a question.
A. No. They told me they had a horrible interaction with Vic that they wouldn't speak about. I didn't have the details.
Q. About when did they tell you that?
A. Really, pretty quickly after meeting us.
Q. Okay. Which you're thinking is around three years ago?
A. Three to four years, yes.
Q. Three to four. Okay. That's fine.
Do you have any idea what prompted them to tell you these things this year?
A. I'm not sure what prompted it. Probably the uproar of what's going on.
Q. Okay.
A. I've had a lot of girls tell me some of their stuff and story about Vic assaulting them.

Q. Like who?
A. A lot. I don't know all their names, but it's a lot.
Q. Tell me the names you can remember, besides the ones --
A. Yeah. Sure.
Q. -- you've already told me.
A. The people that I know of, that have told me, that have come forward, that Vic assaulted them, XXXXX XXXX, XXXX --
Q. Same --
A. Yeah.
Q. Same?
A. Right. The people I've repeated.
Q. Well, besides --
A. The ones --
Q. -- Monica Rial, the XXXX sisters and XXXX XXXXXXXXX, who else can you remember telling you that they were assaulted by Vic?
A. I can't remember all the names, but there have been several.
Q. I understand that. Tell me the ones you can remember.
A. I just gave them to you.
Q. Do it again, please.

A. No.
Q. Excuse me?
A. No.
Q. Mr. Toye, you're not allowed to say no here.
MR. ERICK: Just -- just do it again. It's -- it's fine.
A. XXXXX XXXX.
Q. (BY MR. BEARD) I mean, we can go up to the judge and he can tell you --
A. Sure.
Q. -- I mean, if you want to do that.
A. XXXXX XXXX.
Q. Right.
A. Victor Mignogna assaulted XXXXX XXXX, XXXX XXXX, XXXX XXXXXXXXX, Monica Rial, Jamie Marchi. Those are the ones that I can remember right now.
Q. Did you ever say that Mr. Mignogna assaulted hundreds, or a hundred women?
A. I can't remember.
Q. Really?
A. Uh-huh.
Q. Okay. So you have no memory of ever saying that?
MR. ERICK: Objection, form.
A. I can't remember.

Q. (BY MR. BEARD) Okay. If your memory clears up, would you please tell your attorney so that he can supplement discovery?
A. Sure.
Q. Thank you.
I'll just go through them line by line. Okay. Let's go to page 4. Number four --
A. Uh-huh.
Q. -- glance over it --
A. Yes.
Q. -- and tell me if you remember making -- posting this tweet.
A. I can't remember posting it.
Q. Okay. I'm representing to you, by the way, that all of the pages in here are copies of tweets that were posted on Twitter by someone with the handle Ron Toye.
Okay. Please read, starting with, I will call him awful. And you can stop before the -- before the quote.
A. Sure.
I will call him awful, and this isn't hearsay. There are three types of people in this world. And I am a sheepdog. Quote from a great movie below for reference.

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Q. Okay. Then the next block --
A. Uh-huh.
Q. -- that is a quote.
A. Yes.
Q. Go ahead.
A. It's not the full quote.
Q. Okay. Go ahead and read what's there, if you don't mind.
A. Yes.
And if it ever darkened their doorstep they wouldn't know how to protect themselves. Those are the sheep. Then you've got predators who use violence to prey on the weak. They're the wolves. And then there are those blessed with the gift of aggression, an overpowering need to protect the flock. These men are a rare breed who live too.
Q. What movie is that a quote from?
A. I believe it's American Sniper.
Q. Okay.
A. Chris Kyle.
Q. So does it appear to you that the person who posted this is saying that they are the sheepdog and that that means that they guard the weak?
A. Yes.
Q. Okay. Okay. Is that you?

A. Yes.
Q. Okay. How do you guard the weak?
MR. ERICK: Objection, form.
A. Supporting them. Protecting them. Speaking up for them, if they need.
Q. (BY MR. BEARD) All right. Go to page 5, please.
A. Uh-huh.
Q. Read the text part. You can ignore the headers unless I tell you otherwise.
State the date, I guess.
A. January 25th.
Q. Okay. Okay. Do you recall posting this tweet?
A. I don't remember it.
Q. Okay. Would you read it, please.
A. I am not anonymous. I know Vic. I know ladies very close to me who have the exact same experience with him that mirrors the experiences of a hun -- of hundreds of the survivors coming forward. Some stay anonymous due to fear, understandably. If it walks like a duck, quacks like a duck, it's a duck.
Q. It doesn't actually say duck, does it, though, at the end? It is ellipses, right?
A. Quacks like a duck, it's a -- it's an implied duck.

Q. Dot, dot, dot. Yeah.
Does this jog your memory? Did you --
A. I don't remember tweeting it --
Q. -- remember posting this?
A. -- but that's my Twitter handle.
Q. Okay. Hundreds of the survivors coming forward.
What do you think the mysterious person who posted this tweet meant?
MR. ERICK: Objection, form.
A. I think that this is my Twitter handle so I tweeted this.
Q. (BY MR. BEARD) Okay.
A. And what they meant was, and what I believe, based on what I know about the four victims we've already addressed and the research I've done online, and this was done on the 25th, which is four days after Vic's own testimony admitting he messed up, that there -- and looking online, io9 articles or whatever articles in Google searches and YouTube and all of that, there's hundreds of people talking online about this for years and years.
Q. And so if there's talk for years and years, it must be true?
MR. ERICK: Objection, form.

A. In this situation, what I'm talking about for Victor Mignogna, I believe it, without question, to be true, because of the personal experiences that people very close to me related, and then hundreds and hundreds of accounts online, and his own admission on the 21st that he failed to ask for consent.
Q. (BY MR. BEARD) Well, we'll get to that.
A. Sure.
Q. We'll get to that.
Back to XXXXX and XXXX XXXX. How do you know them again?
A. I met them at a convention.
Q. Did they ever live with you?
A. XXXXX and XXXX both did, at one point.
Q. Okay. How -- how long?
A. About a year ago, maybe two.
Q. For -- are they --
A. About a year.
Q. -- still living with you?
A. No. They live in Florida, I think.
Q. Have you produced any affidavits from them stating that Vic assaulted them?
A. Anything that I've got, my attorney has.
Q. Do you remember any written statements they gave you, that they might have signed, that say Vic

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Mignogna assaulted them?
A. I can't remember.
Q. Or that corroborate your version of the story?
A. Right. I -- I -- I believe so, yes.
Q. Okay. You would have turned that over to your attorney if you had it?
A. Yes, yes.
Q. Okay. How did you meet Monica?
A. I was managing an apartment that she lived in.
Q. Did you ask her out on your first date?
A. Can you clarify your question?
Q. Well, I -- sorry. I assumed a fact.
There was -- was there a first date?
A. Yes, absolutely.
Q. Okay. Who asked who out?
A. I asked her.
Q. Okay. Now, was that harassment?
A. The way I asked her?
Q. The fact that you asked her out --
A. No.
Q. -- is that harassment?
A. No.
Q. Okay. Okay. So you'd agree that just merely asking somebody out doesn't constitute harassment?
A. I'm not sure.

MR. ERICK: Objection, form.
Q. (BY MR. BEARD) Really. Okay.
Who is XXXX XXXXXXXXX?
A. She's a lady I know. Really good, close, personal friend. She used to work at Funimation.
Q. Okay. And what did she tell you about being assaulted by Vic Mignogna?
A. She let me know that she was in her office, Vic came in, closed the door, and then grabbed and kissed her. And then at the end said something along the lines of, I hope that's okay. And then walked out.
Q. So the story she told you was he kissed her first, then said, I hope that's okay?
A. Yeah. Hope you don't mind, and walked out.
Q. Okay.
A. Something around there.
Q. And she told you that story -- did she -- you got that from her?
A. Yes, from her.
Q. Okay. And just to be clear, XXXXX and XXXX XXXX, they told you --
A. Yes.
Q. -- their -- their account? Okay. Okay.
How do you know Ms. XXXXXXXXX?
A. She's a friend of mine.

Q. Well, I know, but, I mean, how -- okay. Rephrase that.
How long have you known her?
A. Two years. One and a half years. Somewhere in there.
Q. Okay. Has she ever lived with you?
A. No.
Q. Okay. When did she tell you about this interaction with Mr. Mignogna?
A. I cannot remember the -- the day.
Q. Was it this year?
A. I'm not sure.
Q. If you would, take a minute and try hard to see if you can remember.
A. Sure.
Q. Just --
A. Do we want to set a timer?
Q. No, that's fine. It's not coming to you?
A. Huh-uh.
Q. Can't remember.
A. I cannot recall.
Q. Do you have problems recalling things, as a general rule?
A. Well, there's a lot of things that happen over a course of time, so --

Q. Sure.
A. -- sometimes it can -- yeah.
Q. Sure. Do you ever remember things that didn't happen?
A. No.
Q. How do you know?
A. Because I wouldn't remember something that didn't happen.
Q. Why not?
MR. ERICK: Objection, form.
A. Because it doesn't even make -- that question doesn't even make sense.
Q. (BY MR. BEARD) It makes perfect sense. I'll re -- I'll rephrase it, though, if you need me to.
A. Sure.
Q. You've testified numerous times that you can't remember making various tweets?
A. Right.
Q. Yet you've also testified that you understand these tweets --
A. Right.
Q. -- which would imply a certain degree of knowledge, but anyway.
A. Uh-huh.
Q. I'm asking, do you have any memory problems,

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and you said no.

A. Correct.

Q. And I'm saying, do you have any memories that turn out to be false?

MR. ERICK: Object -- objection, form.

Q. (BY MR. BEARD) Or have turned out to be false?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Okay. Go to page 5. If you would, read the date and the information -- and what is stated besides the header.

A. On page 5, you said?

Q. Yep.

A. I am not anonymous. I know Vic. I know ladies very close to me who have had -- who have the exact same experience with him that mirrors the experience of hundreds of the survivors coming forward. Some stay anonymous due to fear, understandably. If it walks like a duck --

Q. Oh, I'm sorry.

A. -- quacks like a duck --

Q. You've already done that.

A. Yeah.

Q. My mistake. Sorry about that.

Go to page 6.

A. Uh-huh.

Q. Go to page 6. Look at -- look at that text. State the date, and read the --

A. Sure.

Q. -- tweet.

A. It's January 25th.

Yes, I do. Do you know who I am? Do you think I would make this up? He hurt me. He hurt my personal friends. He knows me personally. He knows who he hurt. Check yourself. You are backing the wrong guy in this one.

Q. Did you send this tweet?

A. It's from my Twitter.

Q. Do you remember sending it?

A. I don't remember sending it, but it's right here in front of us.

Q. Okay. Has your Twitter account ever been hacked, as far as you know?

A. I'm not sure.

Q. Well, I mean, do you know if it's ever been hacked? I mean --

A. I'm not sure.

Q. Can you remember any incident of it being hacked?

A. I am not sure.

Q. Well, do you remember it or not?

A. I don't remember it or not.

Q. Thank you.

A. Yeah.

Q. That's what I'm asking.

All right. He hurt my personal friends. Who is that referring to?

A. Victor Mignogna.

Q. And he knows me personally, is also referring to Vic Mignogna?

A. That is correct.

Q. And he knows who he hurt.

Check yourself.

A. Uh-huh.

Q. What does that mean?

A. In this content, I don't know. I don't have the previous person who's talking to me at that point.

Q. Okay. Does this -- does the following sentence add any context that might --

A. You're backing the wrong guy? No, it doesn't add context because I don't know what they're saying above it.

Q. Have you ever used the phrase check yourself before?

A. I'm sure.

Q. Well, what does it mean?

A. Go back to think, check yourself.

Q. Okay. Go to page 7.

A. Sure.

Q. I'm not sure why there are two tweets on this page. So look at the top one.

A. Uh-huh.

Q. The same thing, read the date and the -- and the text.

A. Sure. January 26.

That's not true. LOL. You obviously don't know how sexual assault cases work. How many victims set up cameras just in case they get assaulted? There is consistency in a story shared by almost -- shared for almost 20 years. It's called a pattern. He is guilty. You will see.

Q. Who is he?

A. In this situation, Victor Mignogna.

Q. Okay. Hypothetically, if this statement was false, what do you think should happen to the person making the false statement?

MR. ERICK: Objection, form.

A. If a -- if the statement was false, then that person -- then Vic would have every right to sue them.

Q. (BY MR. BEARD) What would be an appropriate

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punishment for them?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) In your opinion.
MR. ERICK: Objection, form.
A. Asked to take it off, if it's -- if it's a false statement.
Q. (BY MR. BEARD) That's it?
A. Uh-huh.
Q. Nothing more?
A. No.
Q. What if, hypothetically, Mr. Mignogna was terminated as a result of this false statement, hypothetically --
A. It's --
Q. -- what would be a fair punishment to the person that made the statement?
MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) You're not sure?
A. I'm not a lawyer or a cop.
Q. No, no. I'm asking you just personally, your -- your -- your personal opinion of right and wrong and fairness. What do you personally think would be an appropriate punishment?
MR. ERICK: Objection, form.

A. I'm not sure.
Q. (BY MR. BEARD) Should the person who says this lose their job if they cause Mr. Mignogna to lose his job?
MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) If it's a false statement. I'll rephrase.
If someone makes a false statement accusing Mr. Mignogna of sexual assault, he loses his job as a result of that, and then it later turns out to have been a false statement, is it fair for the person that made the false statement to lose their job?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Why not?
A. Due process we mentioned earlier.
Q. Understood. But the hypothetical is that it's been proven that it's false. Just -- just go with me on the hypothetical.
If it's proven it's false, should the false accuser lose their job?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Why not?

A. Because the job had nothing to do with that statement in this -- in that hypothetical --
Q. What would be --
A. -- situation.
Q. I'm sorry. I spoke over you.
What would be a fair punishment to someone who makes a false allegation that gets the accused fired?
A. That's not for me to decide.
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) Well, what do you think would -- I mean, give me an example of something you think would be fair.
MR. ERICK: Objection, form.
A. I don't know.
Q. (BY MR. BEARD) Really?
A. Yeah.
Q. Okay. All right. We're going to speed this up, then we'll come back. But I'm going to -- I'm going to ask you to look at -- look at that tweet, the second tweet on page 7. Tell me if you remember whether you posted this or not.
A. I do not remember posting it, but it's my Twitter handle.
Q. Right. That's fine. You don't have to say

that.
Go to page 8, and on each of these pages, as I call them out, look at the tweet and tell me if you remember posting the tweet.
A. Sure.
Q. Okay. Go to page 8.
A. Yep.
Q. Do you remember?
A. Nope.
Q. Okay. And it's okay, if you say no, that means you don't remember posting the tweet. Fair enough?
A. Fair enough.
Q. Okay. Go to page 9.
A. No.
Q. Go to page 10.
A. No.
Q. Go to page 11.
A. No.
Q. Go to page 12.
A. No.
Q. Go to page 13.
A. No.
Q. Go to page 14.
A. No.
Q. Go to page 15.

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A. No.
Q. Turn to page 16.
A. No.
Q. Go to page 17.
A. No.
Q. Go to page 18.
A. No.
Q. Go to page 19.
A. No.
Q. Go to page 20.
A. No.
Q. Go to page 21.
A. No.
Q. Go to page 22.
A. No.
Q. Go to page 23.
A. No.
Q. Go to page 24.
A. No.
Q. Go to page 25.
A. No.
Q. Okay. If you would, look at page 26, 27, 28, 29, and 30, and tell me if you remember posting any of those.
A. No.

Q. Okay. If you would, look at pages 31 through 40.
A. Sure.
Q. And tell me if you remember posting any of those tweets.
A. No.
Q. Okay. Look at pages 41 through 50, and tell us if you remember sending any of those tweets.
A. No.
Q. Stop for a second on this. In the last six months, has anyone posted to your Twitter account besides you, as far as you know?
A. Posted to it?
Q. Yeah. Has anyone posted a tweet, besides you, to -- to this handle, @rontoye?
A. People have -- they -- they post -- they replied or posted --
Q. Right.
A. -- or tweeted me.
Q. But I'm talking about -- I'm talking about creating the tweet.
A. No.
Q. You -- you've -- let me rephrase.
You -- you are saying you haven't had any incident, that you're aware of, of someone besides you

posting -- type -- writing a tweet to the rontoye handle, Twitter handle?
A. To me?
Q. No, no, no. Okay. Try one more time.
Has anyone used your account besides you?
A. No.
Q. Okay. Thank you.
Do you think it would be reasonable to assume that with that fact that you just stated, that you actually did send all these tweets we just covered?
MR. ERICK: Objection, form.
A. Yes.
Q. (BY MR. BEARD) Okay. Okay. Read number 50 -- pages 51 through 60.
A. Read them?
Q. No. Look them over and tell me if you -- same drill we've been doing. Tell me if you recall making any -- tell me which ones you recall posting.
A. I don't recall any of those.
Q. Okay. Look at pages 61 through 70, and tell us if you recall posting any of those tweets.
A. No, I don't recall.
Q. Okay. Go to page -- review pages 71 to 80, and tell us if you remember -- which ones you remember posting, which tweets you remember posting.

A. No, I don't recall.
Q. Okay. Go to pages -- review pages 81 through 90, and tell us if you recall -- which pages you recall posting, which tweets you -- sorry. Scratch that.
Please tell us which tweets you recall posting.
A. No.
Q. Okay. Look at pages -- where are -- what number are we on?
A. 91.
Q. Yeah. Look at pages 91 through 100, and tell us if you recall posting any of those tweets.
A. No.
Q. Look at page 101 through 110, and tell us if you remember posting any of those tweets.
A. No.
Q. Pages 111 through 120, please, and tell us if you recall posting any of those tweets.
A. No.
Q. Please look at pages 121 through 130, and tell us if you recall -- which of these tweets, if any, that you recall posting.
A. No.
Q. Okay. Go to page 131 through 140, and review those pages and tell us if you recall making any of --

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posting any of those tweets.

A. No.

MR. BEARD: Let's go off the record just a second. Take a small break.

THE VIDEOGRAPHER: And we're going off the record at 11:25.

(Break taken from 11:25 a.m. to 12:41 p.m.)

THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 3. The time is 12:41.

Q. (BY MR. BEARD) Okay. If you would, Mr. Toye, look at Exhibit 28, page 141.

A. Yes, sir.

Q. Review page 141 through 150, and tell me which of those tweets, if any, you recall posting.

A. I don't remember posting any of my tweets here.

Q. Okay. Which one are we on?

A. 151.

Q. All right. Start with 151 and go to 160, and review those tweets and tell us if you remember posting any of them.

A. Sure.

I do not recall making my tweets here.

Q. Okay. Look at 171 to 180. Review that and tell us if you recall making any of those tweets.

A. Did you say 171, or did you want me to start at 161?

Q. Oh, I'm sorry, 161 to 170.

A. I do not remember when I made all these tweets.

Q. Well, do you remember if you made those tweets?

A. Oh, yeah. I think we -- I think I mentioned that, that it looks like it's from my account. So, so far, yeah, all of these I would say I made. I just don't remember when.

Q. Well, flip back and tell me -- start with the, yes, I made it part --

A. I thought we --

Q. If I'm characterizing you correctly.

A. Let's start with 1 to 70 so far.

Q. Oh, okay. Are you saying that you did make all those tweets?

A. Yeah. That's -- I thought when you said this name, did anyone do this or this, would you assume, so, yeah.

Q. Okay. Unfortunate that we -- I apologize for not clarifying the question.

A. No worries. I wanted to honor your request.

Q. Appreciate you.

Well, we still have to go through it, though.

A. Sure. No problem.

Q. 171 to 180 --

A. Cool.

Q. -- if you would, review those and tell me if you recall making those tweets.

A. Nope. I don't recall making them, but I know that this is my Twitter handle.

Q. Okay. The question I'm asking you is, do you recall making the tweets?

A. No.

Q. Okay. But we've already established, I think, and you can agree or disagree, that in every case this is your Twitter handle?

A. Yes, up to page 180.

Q. The @rontoye is on every -- is on every page that you looked at.

A. Uh-huh.

Q. And as I recall, you don't have any recollection of your Twitter account being hacked or anything like that?

A. That's correct, I don't.

Q. Okay. And no one else uses your account to tweet, correct?

A. That's correct.

Q. Okay. Okay. Well, I'll just ask it straight

up.

A. Sure.

Q. Not being argumentative, just asking the question.

Are you willing to agree that these are your tweets?

A. Yes. So far to page 180?

Q. Through page 180.

A. Yes.

Q. Okay. Well, then we can maybe speed this up a bit.

A. Sure. No worries.

Q. Let's go one -- look at pages 181 to 190, and tell me if those are your tweets -- tell me if you made those tweets.

A. I don't recall making them, but this is my Twitter handle.

Q. Are those your tweets?

A. It looks like it, yes.

Q. Yes. Is that a yes?

A. Looks like it, yes.

Q. I need you to say yes or no.

A. Or it looks like it.

Q. Or I don't know. I mean, those are the --

A. Yeah, I'm not sure. It looks like it.

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Q. Please tell me one of the three, if you could. Are they your tweets?

A. Looks like it.

Q. Let me try one more time. I would like yes, no, or I don't know. I didn't ask if it looked like it, I asked did you -- are those your tweets? Have you -- or, if you prefer, did you post those tweets?

A. It looks like I posted them.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) No, we're going to keep asking this question until I get an answer.

A. Cool.

Q. Yes, no, or I don't know?

A. It looks like I made those tweets.

MR. BEARD: Let's go off the record a second.

A. Sure.

THE VIDEOGRAPHER: Counsel, do you agree?

MR. ERICK: No, I don't. Just -- I think he's answering the question. He's saying that the -- the copies you've given him, the documents, are -- these appear to be his tweets. He said, That's my Twitter handle. No one else has used it.

MR. BEARD: He keeps answering a question I didn't ask. And it's a very simple question here,

Casey.

MR. ERICK: But these -- but listen -- I understand. Listen. But these are -- are -- these are taken out of a thread, I believe.

MR. BEARD: Casey, I don't care what his answer is, I just want one of the three answers. And there's no reason --

MR. ERICK: Okay.

MR. BEARD: I mean, you know --

MR. ERICK: All right. Then let's do it again.

Give him one of the three answers.

MR. BEARD: Yes.

Q. (BY MR. BEARD) Yes, no or I don't know.

A. Can I go with or?

Q. No.

A. I don't know.

Q. Thank you.

MR. ERICK: Just listen.

A. Yeah, I don't know.

Q. (BY MR. BEARD) Are those your tweets?

A. I cannot with 100 percent say it. It looks like it.

Q. Okay. Well --

A. It's chopped up, cut up. I don't see a URL.

It looks like my tweet.

Q. Okay. Well, is that an, I don't know?

A. Correct.

Q. Thank you.

And does that "I don't know" apply to pages 1 through 190?

A. So far, yes.

Q. Thank you.

191 to 200.

A. Sure.

Q. Oh, I'm sorry. And tell us if you made these tweets, whether you made these tweets.

A. Looks like my tweets.

Q. What page are we --

A. We're on --

Q. Please look at --

A. -- 201.

Q. -- 201 through 210, and tell us whether you made those tweets.

A. Sure. It appears to be my tweet.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Did you make those tweets, yes, no, or I don't know?

A. I am not a hundred percent sure if there is anything that's been added or subtracted from this. So

if I can't give you a hundred percent, if it is my tweet, in fact, I can say it looks like my tweet.

Q. Mr. Toye, answer the question, please.

A. It looks like my tweet.

Q. That's not the question I asked. Answer the question I asked, please.

A. I'm not sure.

MR. ERICK: He has, Ty. And, listen, I mean, I -- and I've let you -- I've given you a little rope here.

MR. BEARD: If you -- Casey, if you'd like to stipulate on the record that "it looks like it" is "I don't know," that's fine.

MR. ERICK: No. I'm not -- I'm not the one under oath, so it doesn't matter --

MR. BEARD: Well --

MR. ERICK: But he's given you the answer. At some point we're just -- we're just badgering the witness.

MR. BEARD: Well, if I have to, I'll dis -- I'll -- I'll -- I'll call this and go up to the judge and complain about being nonresponsive.

MR. ERICK: Okay. But that's not going to change his answer. His answer is he thinks he believes that -- look, he has said that's his Twitter

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handle, this -- these appear to be his tweets. These are selected copies of certain tweets. He's given you the very best answer that he -- that he can, and -- and that's it. And if we just keep asking the same question, at some point I'm just going to have to tell him he's already answered, and that's it. So I -- I understand you may not like the answer, but that's -- that's his answer.

MR. BEARD: No, I'm insisting on him answering the question that I asked. At no point --

MR. ERICK: He has. He's not -- he's not --

MR. BEARD: At no point did I say, Does that look like your tweets? I said, Did you -- are those your tweets or not? Did you send them or not?

MR. ERICK: That's his answer. I get it, that you may not like it. I understand -- I think I understand, but --

MR. BEARD: Okay. Saying that again doesn't change anything.

MR. ERICK: But that's the truthful -- that's his truthful answer.

MR. BEARD: That doesn't alter reality.

MR. ERICK: Okay. I understand. He is answering the question. He's not saying, I'm not

answering the question. He's -- He's answered the question. He's answered it several times, and I've allowed it, but, to a point, I have to stop it. And so -- you know, that's -- that's the best the witness can do. I mean, these are -- these are selected tweets. He's not -- he's not hiding from the fact that that's not his Twitter handle. He's said that. And he's said that, These look like to be my tweets.

MR. BEARD: Well, okay. We'll do this -- we'll do it the hard way, then, Casey. That's fine with me.

MR. ERICK: I'm not sure what that means, Ty, but --

MR. BEARD: That means I'm --

MR. ERICK: Why don't we ask the witness --

MR. BEARD: -- that means I'm going to file a motion to compel and ask the court for more time --

MR. ERICK: Okay.

MR. BEARD: -- and go through all that rigamarole, because, you see, you didn't produce any of these tweets to us and --

MR. ERICK: Ty --

MR. BEARD: And I'm trying to authenticate them in a deposition, and I'm getting, looks like, might be, could be, don't know.

MR. ERICK: No.

MR. BEARD: That's fine. That's fine.

MR. ERICK: No. He's saying that's his Twitter handle. He's said, I don't -- I'm not aware of anyone that's hacked it or used it. He said, These appear to be my tweets. But these are selected excerpts.

MR. BEARD: That's fine.

MR. ERICK: I mean, not -- these aren't -- these don't have other information that would corroborate the fact that it was taken on a certain time or date. So that -- that's it.

MS. CHRISTIE: They actually have dates.

MR. BEARD: Yeah, there are dates.

MR. ERICK: Okay. But just --

MS. CHRISTIE: They have specific dates.

THE WITNESS: I didn't -- this was given to me.

MS. CHRISTIE: And some of them have specific times.

THE WITNESS: You're asking me for --

MR. ERICK: He's not saying -- he's saying that these appear to be my tweets, so I --

MR. BEARD: Objection, nonresponsive. We'll move on.

MR. ERICK: Okay. All right.

Q. (BY MR. BEARD) Look at page 211 to 220. Did you post these tweets?

A. It looks like it.

Q. When you say, It looks like it, is that yes, no, or, I don't know?

A. It looks like it. I don't know. It's my Twitter handle.

Q. I don't know, is that the answer?

A. It looks like that those are my tweets.

MR. BEARD: Okay. Objection, nonresponsive.

Q. (BY MR. BEARD) Look at 221 to 230, and tell us -- and answer the question for each of them, did you post those tweets?

A. It looks like it.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Look at pages 231 to 240, and please answer the question for each, did you post those tweets. Or tell us the tweets you didn't post.

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) I'll rephrase.

MR. ERICK: Yes, just --

Q. (BY MR. BEARD) Let's speed this up by simply making each question inferred that you will tell us if

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you made those tweets, if you -- or if you don't recall, or if you didn't. And you'll describe individually, if in the batch, some you did make and some you didn't, and so forth. Is that agreeable?

A. Looks like my tweets.

MR. BEARD: Objection, nonresponse -- nonresponsive.

Q. (BY MR. BEARD) Please look at 241 to 250, same question.

A. It looks like my tweets.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Look at 251 to 260. Same question.

A. They look like my tweets.

MR. BEARD: Objection, nonresponse -- nonresponsive.

Q. (BY MR. BEARD) Look at 261 to 270. Same question.

A. Sure. They look like my tweets.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Look at 271 to 280, please. Same question.

MR. ERICK: Object, form.

A. They look like my tweets.

MR. BEARD: Objection, nonresponsive.

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Q. (BY MR. BEARD) Look at 281 to 290, please, same question.

MR. ERICK: Objection, form.

MR. BEARD: Counsel, would you please tell me what the form objection is.

MR. ERICK: It's a -- it's a compound question. I think the question that we're going with is, is it or isn't it, or --

MR. BEARD: Well, let me ask --

Q. (BY MR. BEARD) Well, when you get through, Mr. Toye, tell me, and I'll ask the question in a long and complicated way.

A. Looks like my tweet.

Q. Actually, I'm going to reask the question, but --

A. Sure.

Q. Thanks. I am representing to you that those are unaltered copies of your tweets. Based on that representation being correct, in other words, assuming that I'm right, did you post those tweets?

A. How do I know if you've presented anything?

Q. I'm saying if it turns out I lied --

A. Right.

Q. -- then you're not -- obviously, you're not stuck to the answer.

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A. Several of the tweets are missing information or cut off in a way. If you look at page 183 --

Q. Sure.

A. -- 244, the sides are altered. There's also missing spots.

Q. Hold on, hold on, hold on. Let us take a look at it. 183?

A. Yes, I think it's 183.

Q. Is your copy maybe just printed wrong? Because mine's crystal clear.

A. Oh, sorry about that. 244.

Q. If you see anything like that, call my attention to it. I mean --

A. Right.

Q. That's --

A. So then I'm calling attention to a document you're telling me is perfect.

Q. Well, no, let me -- I mean --

A. Yeah, see, 244 --

Q. I can understand the confusion.

A. -- it looks cut off a little.

Q. Let's see.

A. You see how the -- the words right there, it kind of looks like it's lined off on a screen capture. Some of them have different markings in there. So it

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looks like, on a document that I'm gonna -- I'm supposed to auth -- 100 percent authenticate, I'm -- I can't say that this hasn't been altered in any way.

Q. Okay. Are we looking at the same page?

A. 244?

Q. Oh, 244.

A. You see there's like a slight line through W, and that W doesn't look like a full W?

Q. Is that illegible?

A. It's -- it's -- it's clearly cut in a way. There's other examples of it. I'm just not going to authenticate something. I'm not an authenticator. It looks like my tweet. It's from my Twitter account.

Q. What I'm asking, and, look, I'm not trying to trap you into anything.

A. Yeah.

Q. I'm just trying to get these tweets authenticated.

A. But that's -- I'm not an authenticator of tweets.

Q. Let me finish, please.

A. Sure.

Q. If, in fact, these are not altered in any material way, are they, then, your tweets? Are they an accurate copy of your tweets?

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A. Hypothetically, if, maybe.
Q. Hypothetically. Hypothetically.
A. If hypothetically they were and you presented stuff that was hypothetically perfect, and they were my tweets, then hypothetically, yes, those would be my tweets.
Q. Well, that's not -- you can't --
A. Well, you just gave me a bunch of hypothetical questions. So hypothetically --
Q. I'm allowed to do that, Mr. Toye.
A. Me too.
Q. No, you're not, actually. I'm -- I'm indulging you.
A. Okay.
MR. ERICK: Just question and answer.
Q. (BY MR. BEARD) All right. Let me try again.
A. Okay.
Q. Of all the tweets you've seen -- all the documents that I'm representing are tweets in that notebook --
A. That's what it looks like.
Q. -- that Exhibit 28, if, in fact, those are accurate --
A. Uh-huh.
Q. -- and accurate being defined as nothing

material has been altered --
A. Right.
Q. -- do they rep -- are they accurate copies of what you tweeted?
A. How can I say that?
Q. Okay.
A. I didn't gather --
Q. Just answer my question. I don't care what the answer is.
A. I don't know.
Q. Thank you. That's -- I tried.
Where are we?
A. Sweet.
Q. Please look at 291 to 300. For each of these documents, tell us if you -- well, rephrase that.
Did you post those tweets, and, if not, tell us which ones you didn't.
A. Looks like it, but I'm not sure.
MR. BEARD: Objection, nonresponsive.
Q. (BY MR. BEARD) Please look at 301 to 310.
A. Uh-huh.
Q. Did you post those tweets, and, if not, would you tell the ones that you didn't.
A. They look like my tweets, but I'm not sure.
MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Please look at 311 to 320. Did you post those tweets, and, if not, tell us which ones you didn't.
A. They look like my tweets, but I'm not sure.
MR. BEARD: Objection, nonresponsive.
Q. (BY MR. BEARD) Please look at 321 to 330. Did you post those tweets, and please tell us the ones you didn't, if any.
A. Can I point out another huge thing, why I can't say this is my tweet? Here's another representation --
Q. Sure.
A. -- of completely different style of tweet. 322.
Q. 322.
A. Yeah. The bottom's cut off. I don't have the timestamp. I don't have the -- the same information. This isn't consistent. I'm not going to authenticate something like that. It looks like my tweet.
Q. What information is --
A. So look at 322 and 323.
Q. Okay.
A. 323 has a timestamp, date, looks a little bit more convincing.
Q. Right.
A. But when you go to 322, it's all cut off.

Q. Well, is it possible to access Twitter from various -- from different devices?
A. I don't know.
Q. Do you access Twitter through a phone?
A. Sometimes.
Q. Do you access Twitter through a computer?
A. Possibly.
Q. Are phones and computers different devices?
A. Yes.
Q. Do phone -- does your phone and your computer look identical on the screen when you access Twitter?
A. I'm not sure.
Q. Come on now.
A. I'm not sure.
MR. BEARD: Objection, nonresponsive.
Q. (BY MR. BEARD) Well, is there anything illegible about the tweet on 322 or anything --
A. It's definitely --
Q. -- that's what --
A. -- altered than other tweets in here. So it -- it is -- it looks like my tweet.
Q. To be fair, I think what you're saying -- what I'm hearing you saying is, is it's formatted differently than --
A. It's --

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Q. -- than the tweet on 323?
A. -- cut, copied and pasted --
MR. ERICK: Object, form.
A. -- differently, yes.
Q. (BY MR. BEARD) Okay.
A. So I can't authenticate it. It looks like my tweet.
Q. (BY MR. BEARD) Thank you.
Is there anything illegible on 322?
A. The text is a little blurry, but it is -- it looks like my tweet --
Q. Well --
A. -- but I can't say it is for sure.
Q. -- if you would, please just read 322 for us.
A. Sure.
Q. And -- and start with the -- with -- with the top line.
A. Yeah.
rontoye@rontoye, February 28.
No he isn't. You trolls think him lawyering up was an offensive move. Sorry. It was defensive. He knows his skel -- the skeletons he has hidden that are coming back to haunt him. Smiley face.
Q. Okay. And there's some symbols at the bottom. Describe those for us, please.

A. One looks like a circle with 95, one looks like two arrows swizzling around with one, and one has a heart that has 27.
Q. Okay. These are Twitter icons, aren't they?
A. It looks like it.
Q. Okay. The one says -- that has 95, what does that icon signify?
A. Looks like 95 people commented on it.
Q. Okay. And what is the one with -- the num -- it has the number -- numeral one by it?
A. One shared it.
Q. Okay. And the one, the last, 27?
A. Twenty-seven people in the world liked it.
Yeah, we can go -- the next page has zero likes, zero re -- or one like, zero --
Q. I appreciate your --
MR. ERICK: Wait for the question.
Q. (BY MR. BEARD) I appreciate you volunteering, but we don't need that right now.
A. Cool.
MR. BEARD: Where were we?
Q. (BY MR. BEARD) Okay. 331 to 342.
A. How -- did you not want me to respond to the --
Q. Oh, yeah. I'm sorry.
A. -- one you asked me previously? I was trying

to honor your question.
Q. Sure.
A. So page 323, we were just going over the -- the likes --
Q. Right.
A. -- retweets, and that, because you brought attention to the other ones --
Q. Right.
A. -- so I wanted to really specify that.
Q. Actually, I'm glad you mentioned that --
A. Cool.
Q. -- because I have a question.
A. Can I finish mine that you asked me?
Q. Sure.
MR. ERICK: All right.
Q. (BY MR. BEARD) Mr. Toye, you probably ought to listen to your counsel and stop talking when he tells you to.
MR. ERICK: Let's just wait for a question.
A. They look like my tweets.
Q. (BY MR. BEARD) Okay. Let's go back to 322, if you don't mind.
A. 330, totally different.
Q. Oh, I'm sorry. Which was the one you were --
A. Page 330 is --

Q. -- complaining about?
A. -- again, completely different from it.
Q. No --
MR. ERICK: Hey.
Q. (BY MR. BEARD) Here, listen to me.
MR. ERICK: All right. Can we take a quick --
MR. BEARD: Yeah, sure.
MR. ERICK: -- break?
MR. BEARD: No problem, no problem.
THE VIDEOGRAPHER: And we're going off the record at 1:18.
(Break taken from 1:18 p.m. to 1:28 p.m.)
THE VIDEOGRAPHER: And we're back on the record. The time is 1:28.
Q. (BY MR. BEARD) And how much time -- oh, here it is right here. Never mind. Never mind.
Okay. Mr. Toye, I showed you 342 pages; is that correct?
A. So far, I'm on 331, but let's flip to the end.
MR. BEARD: Did we not get through --
A. 342.
MS. CHRISTIE: No. He --
THE WITNESS: There's 342 --
Q. (BY MR. BEARD) Oh, okay. Let's finish up 342.

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All right. Do these look like your tweets?
A. They do look like my tweets.
Q. Okay. Do all the other tweets in this binder look like your tweets?
A. They do look like my tweets.
Q. Okay. Let's see. For reference --
A. Sure.
Q. -- the last tweet I showed you was April 4th, 2019.
A. Uh-huh.
Q. And it was our intention to produce these in chronological order, and I'm sure some of them probably aren't. But, generally speaking, my question is, after April 4th, 2019, did you tweet about Vic Mignogna?
A. I'm not sure.
Q. You don't remember if you tweeted about him?
A. I can't recall.
Q. Okay. Did you tweet about Vic Mignogna last -- in the last seven days?
A. I can't recall.
Q. Did you tweet about Vic Mignogna in the last two days?
A. I don't think so, but I can't recall.
Q. Okay. No mem -- you -- just to be clear, you don't remember -- all I'm asking is if you tweeted about

him, not what you tweeted -- well, not yet, but not what you tweeted. And you're saying you don't remember if you tweeted about him at any time from April 4th to now?
A. I can't recall.
Q. Okay. All right. Have you communicated with any conven -- well, okay. I'm going to use the term convention for the next series of questions. And by convention, I mean convention owner, convention manager, anyone in some kind of a management position at a convention. And -- and the type of convention I'm referring to is anime or science-fiction related. Is that clear?
A. Sounds a lot of different things, but, yes.
Q. Right. Well, if you need clarification, feel free to ask.
A. Sure.
Q. Have you contacted any conventions about Vic Mignogna?
A. There was a conversation between me and a Kameha Con that had some parts about Vic.
Q. And I'm -- I'm not criticizing. It would be best if you answered yes or no, and then let me ask you which ones. It reads better on the transcript.
A. Cool.
MR. ERICK: So we need to do -- do the

question again?
MR. BEARD: Yeah.
MR. ERICK: Okay.
Q. (BY MR. BEARD) Have you contacted any conventions and -- about -- about Vic Mignogna?
A. A convention.
Q. Okay. Which convention?
A. Kameha Con.
Q. Have you contacted any other conventions besides Kameha Con?
A. Not that I can think of.
Q. You do not remember contacting any convention about Vic Mignogna, other than Kameha Con; is that correct?
A. Not that I can think of.
Q. How did you contact Kameha Con?
A. Through text message.
Q. Okay. Did you keep those text messages on your phone?
A. Yes.
Q. Did you give those -- copies of those text messages to Shane --
MS. CHRISTIE: Holmberg.
Q. (BY MR. BEARD) Holmberg?
A. I can't recall.

Q. Did you ever tweet -- scratch that.
Did Shane Holmberg post those text messages on Twitter?
A. I'm not sure.
Q. Don't remember any of that?
A. Not right now.
Q. Okay. Did you provide those text messages to your attorney?
A. Yes, I did.
Q. Did you provide copies of your tweets to your attorney?
A. I gave them access to my Twitter.
Q. Okay. So you gave him the login credentials --
A. Uh-huh.
Q. -- and presumably he would be able --
A. Yes.
Q. -- their -- their firm -- okay. Fair enough.
Have you deleted any tweets about Vic Mignogna?
A. Nope, not that I can think of.
Q. Okay. Have you deleted any text messages about Vic Mignogna?
A. No, not that I can think of.
Q. And when I say about Vic Mignogna, what I mean is anything related to Vic Mignogna, the accusations,

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this lawsuit, et cetera. Is that reasonably clear?

A. Not that I can think of.

Q. Okay. And the answer is still not that you can remember?

A. (Witness nods.)

Q. Okay. Bear with me a moment.

All right. Let's go back to XXXX XXXXXXXXX for a moment. I believe you said that you knew her for about a year and a half; is that correct?

A. Roughly. Maybe two.

Q. Okay. How did you meet her?

A. I don't remember exactly how I met her. Friends, something.

Q. Socially?

A. Socially.

Q. Okay. Were y'all friends?

A. Prior to meeting her?

Q. No, no, after you met her.

A. Yeah --

Q. Y'all become --

A. -- absolutely.

Q. And she -- did she live with you?

A. Never.

Q. Okay. Okay. I wasn't sure if I had asked that question.

A. Uh-huh.

Q. And she told you, as I recall -- well, no. I'll just -- I'll ask the question again.

Did she describe to you an assault or a sexual assault by Vic Mignogna?

A. Yes.

Q. Okay. Tell us about it.

A. She said that he went into her office, closed the door, kissed her. And then on his way out said, I hope -- I hope that was okay, or something along the line of that, and then walked away.

Q. Did she say whether she was sitting down?

A. I -- I can't recall right now.

Q. Okay. Did she describe the actual, walks through the door and, like, I don't know, leans over the desk, or, I mean, did she describe any of that?

A. I can't remember --

Q. Any of that detail?

A. -- that part of it.

Q. Okay. And you didn't see it, of course?

A. I did not see that.

Q. Okay. Do you know Jamie -- well, you know Jamie Marchi; you've testified to that.

How do you know Jamie Marchi?

A. She's my friend.

Q. Okay. About how long have you known her?

A. Four years, four or five years.

Q. Okay. Did you meet her socially?

A. Yes.

Q. Okay. Did she describe a sexual assault, of any kind, by Vic Mignogna, on her?

A. She described him pulling his -- her hair and --

Q. Fair enough.

A. -- forcibly whispering -- and then also whispering in her ear, sexual stuff.

Q. When I say sexual assault, you -- any kind of assault.

A. Okay. Perfect.

Q. That's fine.

I'm sorry. But, go ahead. Would you describe what she told you.

A. Yeah. She said that he reached up behind the back of her head, grabbed it, clinched his fist, pulled her hair back, and then whispered in her ear, something that she didn't exactly remember the exact words, but whispered in her ear creepily and made her feel dirty.

Q. But she didn't tell you what those words were, just that she was creeped --

A. That was creeped out --

Q. -- she was creeped out by it?

A. Yeah.

Q. Okay.

A. I would be creeped out.

Q. And you believed her, I guess?

A. Oh, yes.

Q. But you weren't there? You didn't see it happen?

A. Correct. I wasn't there.

Q. Okay.

A. To my knowledge, it happened at Funimation in the lobby.

Q. Right. In the front lobby of Funimation?

A. Uh-huh.

Q. Have you ever been there?

A. I've visited there once or twice.

Q. What does the front lobby look like?

A. I have no -- I cannot remember. Got a desk, I think.

Q. And is it a big area, a small area? I mean --

A. It's a big area.

Q. How many people are -- when you've been there, about how many people, on average, have been in that area?

A. I have no idea.

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Q. More than one?
A. Yes.
Q. More than five?
A. I'm not sure. I've been there once or twice.
Q. Have you ever been there when no one was there?
A. No.
Q. Okay. Was there a receptionist when you've been there --
A. Uh-huh.
Q. -- sitting up front?
A. (Witness nods.)
Q. Okay. Did anyone related to Funimation -- and I'm gonna -- I'll describe that in a second -- ever tell you it was okay to disclose that they had conducted an investigation?
And before you answer, when I say everyone related to Funimation, I mean anyone employed by Funima -- that you know was employed, either past, present, contractor or W-2 employee, anyone in management, and for purposes of this discussion, we'll include Christopher Sabat.
So did any of that group of people ever tell you it was okay to disclose that they conducted an investigation?
MR. VOLNEY: Objection, form.

Q. (BY MR. BEARD) Answer.
A. I never had a conversation about that.
Q. Did you have a conversation with anyone at Funimation who was in management?
A. No, not that I can think of.
Q. And forgive me if I reask questions I've already asked, but we broke for lunch and I want to make sure I get it down.
Okay. If you would, take a look at Exhibit 28 and flip to page 13.
A. Yes.
Q. Would you read the text of that tweet. You can omit the header --
A. Sure.
Q. -- information.
A. It says, or it reads: I know you have to be able to add these clues up. Fifteen years of the same story over and over. People posting their stories. Maybe, just maybe, there might be some truth to it, and if there is, you're backing a predator. Does this sound familiar? Take your time. I can wait. GIF.
Q. Who are you talking about in that tweet?
A. Vic Mignogna.
Q. Don't want to put words in your mouth, but is it a fair reading of that sentence that you're calling

him a predator?
MR. ERICK: Objection, form.
A. Yes.
Q. (BY MR. BEARD) When you say predator, what -- what do you think of, yourself, as a predator?
A. Sure. What I think of as a predator is anyone or anything that's in a position that -- or has ability to identify, isolate, and take advantage of that isolation or weakness in another being, thing, item, and seeks to do some level of harm, or control, manipulate.
Q. So a sexual predator, as people generally understand that term, would be a predator by your definition?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) Correct?
MR. ERICK: Objection, form.
A. That would be an example, yeah.
Q. (BY MR. BEARD) Yeah. It's not necessarily the only example --
A. Right.
Q. -- I'm just saying --
A. That would be one, yeah.
Q. Yeah. That -- that -- that predator includes sexual predator; is that a fair statement?
A. Yes.

Q. Okay. Okay. Let's flip to page 20. Would you -- when I ask you to read the tweet, unless I tell you otherwise, just read the text. You don't have to read the header. And I mean read it out loud. I'm sorry.
A. Bye -- I don't know what that is. It's some kind of thing.
Q. An icon?
A. Yeah, some kind of icon.
Q. An emoticon perhaps?
A. Yeah.
Have fun with the predator. Can't wait for your -- for you apology.
Obviously spelling mistake, or grammar.
I will unblock you when it comes out just to see that. Emoticon.
Q. Is this a reply?
A. I don't know. It's missing some data.
Q. Take a look at the header and -- and see if that clears it up.
A. It says, rontoye@rontoye, February 2. And it says, replying to canvaspirate and rialisms.
Q. Okay. Do you -- so is canvaspirate a tweet -- a Twitter handle?
A. It looks like it.

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Q. Okay. Do you know who that might be?
A. Not really, no.
Q. Okay. rialisms is Monica Rial's Twitter handle, isn't it?
A. Correct.
Q. Okay. All right. So this is posted as a reply, apparently?
A. Correct. Looks like it, yes.
Q. Okay. Do you remember what the context was?
A. No.
Q. Okay. But you're telling someone, Bye. Have fun with the predator. Can't wait for you -- your, I assume --
A. It was --
Q. -- apology?
A. -- supposed to be your, it looks like.
Q. And who are you talking about?
A. Looks like on this one -- I'm not sure on this, but -- I'm not sure. I don't know who or what was the previous conversation so it could be anybody.
Q. If you were a betting man, who would you say you were talking about?
MR. ERICK: Objection, form.
A. I don't know.
Q. (BY MR. BEARD) Okay. Go to page 22, please.

A. Sure. Okay.
Q. Same thing. Please read the text.
A. If only one says it, but there are 10, 20, 30-plus people saying the same thing over the past 15-plus years, even if 10 to 20 percent are false, that would mean no less than 8 are true. If only eight assaults, is that enough to judge a person as a predator?
Q. Is that last question rhetorical?
MR. ERICK: Objection to the form.
MR. BEARD: What's the form --
A. It seems like it.
MR. BEARD: -- objection?
MR. ERICK: I just -- I guess I don't understand.
THE WITNESS: Yeah, I don't understand, in a sense, it --
Q. (BY MR. BEARD) Do you know what rhetorical means, Mr. Toye?
A. Yeah, abso -- yes, I do, but I'm --
Q. Okay.
A. Yeah.
Q. In other words, are you asking that question sarcastically to say he is a predator?
A. I'm not sure. I don't know the -- it shows

that I'm replying to somebody, so I don't know exactly who I'm talking about, what I'm talking about to the previous tweet. It's not provided.
Q. Would it be a fair inference from that sentence -- from that sentence that you're calling Vic Mignogna a predator?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) In your opinion.
MR. ERICK: Objection, form.
A. I'm not sure, based on this.
Q. (BY MR. BEARD) Right.
A. But when I say predator, and I'm speaking of Vic, it's because of my understanding of what he did to Monica Rial, XXXXX and XXXX XXXX, XXXX XXXXXXXXX, Jamie Marchi, and then the research I've seen online, and the hundreds and hundreds of things I've seen. So in my opinion --
Q. We'll get into that later.
A. -- he's a predator.
Q. I appreciate you volunteering, but --
So back to my question. Would it be -- do you think it would be a reasonable reading of that sentence --
MR. ERICK: Objection.
Q. (BY MR. BEARD) -- that --

MR. ERICK: Sorry, go ahead.
MR. BEARD: What's your objection?
MR. ERICK: I was -- I was -- I was going to let you finish.
MR. BEARD: Okay. I'll start over.
Q. (BY MR. BEARD) Is it a fair reading of that question that it implies that Vic Mignogna -- or whoever you're talking about in here, is, in fact, a predator?
MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) Okay. It would be fair, wouldn't it, that to take -- to take the words at face value, if there are 10, 20 or 30 people accusing someone of being a predator?
A. Right.
Q. Do you feel like that alone is enough to establish their guilt?
MR. ERICK: Objection, form.
A. Depends on what you mean by guilt.
Q. (BY MR. BEARD) That they are, in fact, a sexual predator?
MR. ERICK: Objection, form.
A. Could be.
Q. (BY MR. BEARD) Well, I'm -- okay. I'll ask it again.

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If 10 people say Vic Mignogna is a sexual predator, do you think they should be believed, absent any other evidence, other than they just said it?

A. I'm not sure.

MR. ERICK: Objection -- objection, form.

Q. (BY MR. BEARD) Yeah. You're not sure?

A. I'm not an attorney or lawyer.

Q. No, I'm just asking if you -- by your definition of predator --

A. Uh-huh.

Q. -- you know --

A. It seems to be corroborated.

MR. ERICK: Hold on, hold on.

THE WITNESS: Sorry.

Q. (BY MR. BEARD) If 10 people say he's a predator, and we're using your definition of predator in this question, do you think that that is sufficient evidence to conclude that he is a predator?

MR. ERICK: Objection, form.

A. I don't know what other people can conclude. I just know my opinion.

Q. (BY MR. BEARD) I'm asking your opinion.

A. In my opinion?

Q. Yes.

A. If they had a fiancee like I do that was

assaulted by Vic Mignogna, two very close friends, XXXXX and XXXX XXXX, who were assaulted by Vic Mignogna, their friend, XXXX XXXXXXXXX, who was assaulted by Vic Mignogna --

MR. BEARD: Objection, nonresponsive, everything --

A. -- Jami Marchi, who was assaulted by Vic Mignogna --

MR. ERICK: Everyone needs to let everybody finish, so --

A. Jamie Marchi, assaulted by Vic Mignogna --

MR. BEARD: Not at the cost of --

A. -- and then looking online and seeing hundreds and hundreds of women saying their story, videos, his own personal testimony saying he messed up, yes, it's fair to say that's a predator.

Q. (BY MR. BEARD) Okay. Would you do me the courtesy --

A. Sure.

Q. -- of answering the question I'm about to ask, and not the question that you want to answer apparently.

A. Okay.

Q. If 10 people say Vic Mignogna is a predator, and they furnish no other evidence other than they say it, do you think Vic Mignogna should be considered a

predator?

MR. ERICK: Objection, form. Objection, sidebar.

Q. (BY MR. BEARD) Answer the question.

A. It's not for me to decide.

Q. I'm asking you if you personally think Vic Mignogna is a predator --

MR. ERICK: Objection --

Q. (BY MR. BEARD) -- in those fac -- with those facts?

MR. ERICK: Sorry. Objection, form.

A. I stated my opinion about Vic as a predator, and I believe he is, based on evidence.

MR. BEARD: Objection, nonresponsive. Let me try again.

Q. (BY MR. BEARD) How many people should accuse someone of being a predator, or let's just say predator -- should accuse someone of being a predator and that be sufficient, in your opinion, to establish their guilt?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) You don't know?

A. Huh-uh.

MR. ERICK: Objection, form.

THE WITNESS: Sorry.

Q. (BY MR. BEARD) In the case of Mr. Mignogna, is it one?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Would one person accusing him of being a predator be sufficient to convince you of his guilt?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) Well, I mean, throughout all these 342 tweets you seem to be calling him a predator over and over; is that fair to say that?

MR. ERICK: Objection -- wait. Objection, form.

A. I believe based on what I know from Monica Rial, XXXXX XXXX --

MR. BEARD: Objection, nonresponsive.

A. -- XXXX XXXX, XXXX XXXXXXXXX --

MR. BEARD: We've heard this before.

MR. ERICK: Hold on. Hold on.

MR. BEARD: We've heard this before.

MR. ERICK: He gets -- Ty, he gets to finish the answer. I know --

MR. BEARD: He doesn't get to filibuster my time, Casey.

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MR. ERICK: He's not filibustering anything. He's answering the question.

MR. BEARD: No, he's not. He's repeating the same --

MR. ERICK: You're not even letting me finish my --

MR. BEARD: I understand, but --

MR. ERICK: Okay. This isn't going to go well if we keep interrupting each other. So even though you don't like it, you may not like the answer, he gets to finish, you get to say what you want to say about it. There it is.

MR. BEARD: All right.

MR. ERICK: All right.

MR. BEARD: I'm going to ask one more time, and I will absolutely shut this down and we'll go visit with the judge. You're being nonresponsive -- your client is being nonresponsive, excuse me. I don't like to talk to somebody's client.

MR. ERICK: Okay.

MR. BEARD: And all I'm asking is that your client answer the question I ask --

MR. ERICK: Yes.

MR. BEARD: -- and not run the clock out. It's not going to work anyway. We got three and a half

hours, so --

MR. ERICK: All right. I don't want to argue about it anymore, but go ahead.

MR. BEARD: Let's take a break.

MR. ERICK: Okay.

MR. BEARD: I need five minutes.

THE VIDEOGRAPHER: We're going off the record at 1:50.

(Break taken from 1:51 p.m. to 1:59 p.m.)

THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 4. The time is 1:59.

Q. (BY MR. BEARD) Mr. Toye, if Vic Mignogna were indeed guilty of the things that you pretty clearly believe him to be guilty of, what do you think would be an appropriate punishment?

MR. ERICK: Objection, form.

A. I'm not sure. I'm not a cop or a lawyer.

Q. (BY MR. BEARD) Well, no, I'm asking just your opinion. I mean, what do you think -- what penalty do you think someone should pay for that?

MR. ERICK: Objection, form.

A. For what he did to Monica Rial?

Q. (BY MR. BEARD) If it were true.

A. And XXXXX and XXXX?

Q. If it were true.

MR. ERICK: Objection, form.

A. I'm not -- I'm not sure.

Q. (BY MR. BEARD) Should he never be able to work again --

MR. ERICK: Objection.

Q. (BY MR. BEARD) -- in -- in the anime field?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Okay. Look at page 23, please, of Exhibit 28. Would you read the text of that tweet.

A. Sure.

Don't give up on him regardless of what comes out. That is not the intention of anyone. What most want is the truth to come out, an apology, healing, and safety for ladies at conventions until he gets help and proves himself to not be a predator. He needs help.

Q. How can someone prove themselves to not be a predator?

A. I'm not sure.

Q. So then this tweet -- you put a condition in this tweet that you can't explain; is that correct?

MR. ERICK: Objection, form.

A. What was your question?

Q. (BY MR. BEARD) How would he prove himself to

not be a predator? What would he have to do?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Okay. So basically, then, you weren't real serious about this tweet, then; is that correct?

MR. ERICK: Objection, form.

A. I'm not the person that he hurt, so I feel like -- or a person that is a predator hurt, so I would say that would be up to the person he or she, the predator, made the offense to, so whatever that would look like.

Q. (BY MR. BEARD) Okay. To be fair, so you're saying that if the victims were satisfied, you would be satisfied?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) I mean, I'm not trying --

A. Sure.

Q. -- to put words in your mouth, I'm just --

A. No, that sounds --

Q. Is that fair?

A. That sounds fair.

Q. Okay. Okay. What if some victims are satisfied, but others aren't, is he still a predator?

MR. ERICK: Objection, form.

A. If some victims are satisfied, is he still a

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predator? I feel like if he did the acts, that would be predatorial behavior. He's forgiven by some and not by others, but it's not for me to make the determination for that. But, in my opinion, he would still be a predator.

Q. (BY MR. BEARD) But to be fair --

A. Right.

Q. -- and throughout these tweets you've called him a predator, right?

A. Right, because in my opinion, I believe him to be a predator.

Q. I understand why you did it. I'm just simply confirming that --

A. Yes.

Q. -- you called him a predator.

A. Correct.

Q. Many times?

A. Yes.

Q. Okay. So would you cons -- would you still consent -- continue to call him a predator if, hypothetically, half of his victims said, I'm good?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) But the other half weren't, they weren't satisfied?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Did you ever think about that?

A. Yes.

MR. ERICK: Objection.

THE WITNESS: Oh, sorry.

MR. ERICK: No, you're fine. Go ahead.

Q. (BY MR. BEARD) Has Vic ever been convicted of a sexual crime, to your knowledge?

A. I'm not sure.

Q. Well, I mean, it really kind of is a yes or no or either you --

A. I don't know.

Q. Have you ever heard -- let me rephrase this.

Do you have any evidence that he has ever been convicted of a sexual crime?

A. No.

Q. Thank you.

All right. Go to page 25. Read that, please.

A. Sure.

LOL. Exactly. So when it comes out he is a predator, this isn't my truth, he wouldn't prey on me. This is current truth of him as a subpar human. What will be your apology? Give me an example. I already know I am right, so I don't have to apologize. Insider

knowledge and all, with a smiley face.

Q. What insider knowledge were you referring to?

A. The information I know about his assaults on Monica Rial, XXXXX XXXX, XXXX XXXX, XXXX XXXXXXXXX, Jamie Marchi.

Q. Okay. By February 2nd, had -- scratch that.

To your knowledge, has -- have XXXXX and XXXX XXXX commented publicly on this whole matter?

A. Not to my knowledge.

Q. Who reported this incident to Funimation --

MR. ERICK: Object.

Q. (BY MR. BEARD) -- with -- sorry.

Who reported the purported incident with XXXXX and XXXX XXXX and Vic Mignogna to Funimation?

A. I'm not sure.

Q. Do you know if Monica did, Monica Rial?

A. I'm not sure.

Q. Did you?

A. I did not.

Q. Okay. Has XXXX XXXXXXXXX publicly commented on this matter?

A. Not that I can think of.

Q. Okay. Did you report the purported incident with Vic Mignogna and XXXX XXXXXXXXX to Funimation?

A. No, I did not. I'm not an employee of

Funimation.

Q. I didn't ask that question, but, thank you.

Did Monica Rial report XXXX XXXXXXXXX and Vic Mignogna's purported interaction?

A. I'm not sure.

Q. Did you and Monica Rial text each other regarding Vic in the last six months?

A. I'm sure we have.

Q. Did you turn those text messages over to your attorney?

A. Yes, I think so.

Q. Have you emailed each other regarding Vic in the last six months?

A. Not that I can think of.

Q. Okay. Let's go to page 12 --

A. Sure.

Q. -- please. Well, hold on one second. Maybe I'll read before I --

A. Sure.

Q. -- direct you. Okay. Yeah, go to 31. Okay. Read 31, please.

A. I don't need to hear him out because I know a very personal account of his atrocious behavior, and him and I are going to talk about it really soon.

Q. Did you literally mean you were going to have a

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conversation with him?
A. I'm not sure.
Q. You don't remember what you meant?
A. It looks like it. It looks like I wanted to have a talk with him.
Q. It wasn't a veiled threat to beat him up or physically attack him?
A. I'm not sure.
Q. Could it have been?
A. I'm not sure.
Q. If you heard somebody say so-and-so did a very bad thing, and he and I are going to talk about it really soon, what would you infer from that statement?
MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) Would it be reasonable for someone to infer that you're pretty angry with Vic at this point --
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) -- when you're typing this?
MR. ERICK: Objection, form.
A. I didn't mention Vic in this tweet.
Q. (BY MR. BEARD) Oh, is this not about Vic?
A. I don't know. I don't have any other tweets before or after.

Q. Okay. Go to page 89, please.
A. Sure. Sure.
Q. Please read that one.
A. Okay. It says: I would. No one wants him to die. I want to kick his ass for hurting my fiancee and a few of my female friends. But if anyone threatens his life, I will report it, and I ask you to do the same, not just the website, but to the cops.
Q. Who is -- who are we referring to?
A. It sounds like Vic --
Q. Okay.
A. -- because he assaulted my fiancee.
Q. Is there anybody else that in February you would have tweeted out, I want to kick his ass?
A. There could be people. I'm not sure.
Q. Were there?
A. I'm not sure.
Q. Okay. Were you angry at Vic in early February?
A. Yes.
Q. Okay. Were you angry at him in, say, late Jan -- that's not -- yeah. Around January 23rd of 2019, were you angry with Vic?
MR. ERICK: Objection, form.
A. Yes.
Q. (BY MR. BEARD) How angry?

A. I was really angry after I found out that he assaulted my fiancee, yes.
Q. Furious?
A. Pretty furious, yes.
Q. Is that fair?
A. Yeah.
Q. A lot of malice in your heart to him; is that fair?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Help me with this. You just agreed you were furious at him, but there's no malice?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Okay. Just to be clear, you can be furious with anger at someone, and that's not -- and that's not malice?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) It's not malicious even?
MR. ERICK: Objection, form.
A. In my opinion, there -- there is -- there are times when that is correct.
Q. (BY MR. BEARD) Was that correct in late January of 2019?
MR. ERICK: Objection, form.

A. That I didn't have malice towards Vic? That's correct.
Q. No malice?
A. None.
Q. Okay. Go to 209, please.
A. Sure.
Q. Read that one, please.
A. Sure. No direct apology to Monica or any other survivors. General comment. And if people respect his wishes, why are people still attacking her? I think we give the fans what they want, a court battle, and let's see who walks away a registered sex offender. Smiley face. Let's play that game.
Q. Okay. Are you talking about Vic Mignogna?
A. It looks like it, yes.
Q. In fact, aren't you replying to Vic Mignogna?
A. It looks like I'm replying to snap -- snapperking, and it says, and Vic Mignogna, but that is --
Q. If, in fact, that's Vic Mignogna's Twitter handle, then you would be -- it's fair to say you're replying to Vic Mignogna; is that correct?
A. That's not how Twitter works.
Q. Oh. Explain it to me.
A. So some -- if I send a direct message to you,

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for instance, when you tweeted at me, we'll be in touch. That would be -- you would be sending it to me. If I reply directly to you it would be, Ron replied to Ty Beard.

But if, say, somebody on that same post replies to you, since you tagged me, it's going to show this, this, this.

Q. Whoever was tagged in the -- in the conversation?

A. Yes, correct.

Q. Okay. When you -- when you --

MR. ERICK: Still don't understand it, but, yeah.

MR. BEARD: I'm an expert. Can't you tell?

Q. (BY MR. BEARD) But when you're typing this reply, do you see who all has been tagged in it?

A. Not -- I don't really pay attention. There was so many tweets coming at me at that time period, like, an --

Q. Fair enough.

A. -- insane amount of tweets.

Q. Fair enough. Fair enough. Okay.

Let's see who walks away a registered sex offender.

A. Uh-huh.

Q. Were you implying that Vic Mignogna is a registered sex offender?

A. No.

Q. Would it be reasonable for someone to imply that from that statement?

MR. ERICK: Objection, form.

A. No.

Q. (BY MR. BEARD) I mean, in your opinion.

MR. ERICK: Object, form.

A. No.

Q. (BY MR. BEARD) Do you have any recollection of what you meant by walking away a registered sex offender?

A. Based on what I saw online, it's talking about some people with accounts of 16-year-olds and 14-year-olds. I don't know. I'm not a lawyer --

Q. Do you have any idea --

A. -- but they could come forward.

Q. -- what the term registered sex offender means?

A. No.

Q. Okay. But you used it in this tweet --

A. Yeah.

Q. -- apparently?

What do you think it means?

A. Somebody who is known to be a sex offender.

Q. Convicted of a sex offense?

A. Huh-uh. I don't know.

Q. Who registers them, then?

A. I don't know. I'm not a cop or an attorney or -- and don't know the process.

Q. So, forgive me, you -- you use the term registered sex offender --

A. Uh-huh.

Q. -- in reference to Vic Mignogna; that's fair, isn't it?

A. Could be.

Q. No. You just tell me.

A. Seems fair.

Q. Is that a fair -- is that a fair reading?

A. Yes, sir.

Q. Okay. All right. You use the term registered sex offender, and you're sitting here telling me that you don't actually know what a registered sex offender is; am I hearing this right?

MR. ERICK: Objection, form.

A. With the full detail, I can't say with a hundred percent, but somebody who sleeps with prostitutes and is -- accounts of 14- and 16-year-old girls, it seems like that's what --

Q. (BY MR. BEARD) Have you ever had an affair?

A. No, never.

Q. What did you get divorced over?

A. I was an asshole.

Q. Is that it?

A. Yeah. I didn't like the lady, and she didn't like me. We got a divorce.

Q. You ever had sex with a prostitute?

A. Never.

Q. Ever gone to strip clubs?

A. Yes. I've been to a strip club when I was 18. Topless. Yeah, when I was 18, but that's it.

Q. Let's get back to what you feel is the definition of registered sex offender.

A. Sure.

Q. Tell me -- did I hear you correctly -- and I really am not trying to be combative, but I'm just trying to get this pinned down.

What I hear you say is, I don't really know what a registered sex offender is.

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Is that fair?

A. Based -- in that moment, based on my opinion, it was a maybe, who knows what could come forward.

Q. (BY MR. BEARD) Is that term insulting, do you think?

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MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) If I called you a registered sex offender on Twitter -- on Twitter, would you find that insulting?
A. I would ignore it.
Q. Would you find it insulting if you read it?
MR. ERICK: Objection, form.
A. I wouldn't give it a second of thought.
Q. (BY MR. BEARD) So no matter what anybody says about you on Twitter, you aren't offended ever?
MR. ERICK: Objection, form.
A. Sometimes.
Q. (BY MR. BEARD) Okay. Do you think a reasonable person would believe that the term registered sex offender means someone who was convicted of a crime involving a sexual offense --
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) -- sexual crime?
MR. ERICK: Objection, form.
A. I don't know. I don't know what other people think.
Q. (BY MR. BEARD) So you used this term in regard to Vic Mignogna without actually knowing what it meant? Is that --

MR. ERICK: Objection --
Q. (BY MR. BEARD) -- what we're saying?
MR. ERICK: Objection, form.
A. I'm sharing my opinion.
Q. (BY MR. BEARD) All right.
A. Based on --
Q. But you just said --
A. -- knowing that he assaulted my fiancee, XXXXX and XXXX XXXX --
MR. BEARD: Objection, nonresponse.
A. -- Jami Marchi, hundreds of girls online --
Q. (BY MR. BEARD) Mr. Toye, I need you to answer my question --
(Multiple speakers overlapping.)
Q. -- and stop going through --
MR. ERICK: It will go quicker, Ty, if you let him finish, and then you object nonresponsive.
MR. BEARD: No, I don't think so.
MR. ERICK: All right.
MR. BEARD: I've heard that enough. We're running the clock out. Try it again.
Q. (BY MR. BEARD) Would it be reasonable for someone who reads the term registered sex offender in reference to another person to conclude that that person was guilty of a sexual crime, yes or no?

MR. ERICK: Object -- objection, form.
A. I don't know.
Q. (BY MR. BEARD) You don't know. Fair enough.
If you read it, would you infer that they were guilty of a sexual crime?
A. I don't know.
Q. Okay.
(Sotto voce.)
MR. ERICK: Objection to the sidebar comments. Carey, that's inappropriate, and that's the second time I've heard you comment about the witness.
Carey, do you understand?
MS. CHRISTIE: I got you.
MR. ERICK: Do you understand?
MS. CHRISTIE: Yeah, I understand you fully. Calm down.
MR. ERICK: All right. Then let's stop the cute remarks.
MS. CHRISTI: Calm down.
MR. ERICK: I am calm.
MS. CHRISTIE: No, you're not.
MR. ERICK: Stop -- stop making little snide remarks.
MS. CHRISTIE: Don't yell at me. Don't yell at me.

MR. ERICK: Okay. Well, then behave yourself.
MS. CHRISTIE: I am.
MR. BEARD: Excuse me? I'm sorry. Did you actually tell a female attorney to behave herself?
MR. ERICK: I did.
MR. BEARD: You got to be joking. Ah, that's beautiful. Okay. Let's go --
MS. CHRISTIE: Isn't that harassment? According to their definition, it is, Casey.
MR. BEARD: Well, I don't know.
MR. ERICK: Carey --
MR. BEARD: I don't know.
Q. (BY MR. BEARD) Mr. Toye --
MS. CHRISTIE: Actually, according to their definition, what you just said to me is harassment.
MR. ERICK: Let's -- let's take a break. Let's take a break.
THE VIDEOGRAPHER: Mr. Beard?
MR. BEARD: Yeah, that's fine.
THE VIDEOGRAPHER: And we're going off the record at 2:17.
(Break taken from 2:17 p.m. to 2:25 p.m.)
THE VIDEOGRAPHER: And we are back on the record. The time is 2:25.

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Q. (BY MR. BEARD) Mr. Toye, turn to page 11 of Exhibit 28.

A. Uh-huh.

Q. Read it, please.

A. Yes it does. LOL. There are hundreds of girls on here testifying to their experience. And are you blind? Vic's victims are testifying in the court of social media, and people are calling them liars. This is why people don't come forward. You blindly trust this man despite all the evidence.

Q. So you approve of people making accusations in social media; is that correct?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) Really?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Okay. Read -- don't read it out loud, but take a look at the second line that starts out with: Vic's victims. Read that line please and complete the sentence. Just look it over.

A. Uh-huh.

Q. Is it fair to infer that you're approving of Vic's victims testifying in the, quote, court of social media?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) You don't know if you were approving this?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Okay. Let me get this straight. I just want to be sure I understand.

You say: Vic's victims are testifying in the court of social media, and people are calling them liars. This is why people don't come forward. You blindly trust this man despite all evidence.

Are you telling me that you can't figure out if you were in favor of Vic's victims testifying in the court of social media?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) You don't know if you're -- you don't know if you meant that that was a good thing or a bad thing?

A. There --

MR. ERICK: Objection, form.

A. I -- I'm not sure.

Q. (BY MR. BEARD) Okay. Does it offend you when people testify in the court of social media?

MR. ERICK: Objection, form.

A. I'm not sure.

MR. BEARD: What's wrong with the -- what's wrong with the question?

MR. ERICK: I don't understand, like, there's no court of social media, so you're asking him --

MR. BEARD: Oh, I'm sorry.

MR. ERICK: Well, hold on --

Q. (BY MR. BEARD) Would you define the term --

MR. ERICK: -- I'll finish it. I'll finish it. You're just asking him --

MR. BEARD: I withdraw the question.

MR. ERICK: You're asking --

MR. BEARD: I'll withdraw the question --

MR. ERICK: Okay.

MR. BEARD: -- for your well-founded objection.

Q. (BY MR. BEARD) What is the court of social media?

A. I'm not sure.

Q. You're not sure. What do you think it is?

A. Social media.

Q. So the court of social media is social media; is that correct?

A. Maybe. And it depends on the context of the

conversation.

Q. Well, what's -- in the context of this conversation?

A. I don't know. I don't have the other parts.

Q. What other parts?

A. This is a reply --

Q. Right.

A. -- to starburstcos, so I don't know what they said to me.

Q. Is there anything wrong with victims of sexual assault making accusations on Twitter that they have been assaulted by a particular person?

MR. ERICK: Objection, form.

A. If a victim brings their testimony forward and they want to share their story of a victim, meaning they were assaulted, I am okay with them sharing their story.

Q. (BY MR. BEARD) Is that a yes?

A. I gave my answer. I believe --

Q. Okay. I'll try again.

A. -- there's context. Sorry.

Q. I'll try again.

Is there anything wrong with victims who claim to have been sexually assaulted, stating on Twitter, I was sexually assaulted by so-and-so?

MR. ERICK: Objection, form.

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Q. (BY MR. BEARD) Anything wrong with that?

MR. ERICK: Object to form.

A. I don't know.

Q. (BY MR. BEARD) You don't know. So there's nothing wrong with it. You just don't know if it's wrong or right?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Not sure.

Here's what I don't understand. Maybe you can help me. You seem to have complained a lot -- and if I'm mischaracterizing the tweets, please correct me. But you seem to have complained a great deal about the fact that people are challenging Monica Rial's testimony, Jamie Marchi's testimony, and so -- sorry, accusations against Vic Mignogna. You seem to not be happy about that in these tweets; is that fair?

MR. ERICK: Objection, form.

A. I'm not sure. I'm not happy that Vic assaulted Monica.

MR. BEARD: All right. I'm calling this deposition, and I'm going up to talk to the judge, Casey. This is bullshit.

Please strike that.

MR. ERICK: Okay. I don't know --

MR. BEARD: Your client is being nonresponsive in violation of 199.5.

MR. ERICK: Ty --

MR. BEARD: You have not produced -- you have not produced the tweets. We're trying to authenticate this so that we don't have to go do this, but I've had enough of this.

MR. ERICK: Ty, Ty, look --

MR. BEARD: Don't start that shit with me, Casey. I've had --

MR. ERICK: What are you so -- what are you so excited about? I'm trying to respond to you.

MR. BEARD: I'm excited because you're being condescending and I'm getting tired of it.

MR. ERICK: Ty -- all right. All right.

MR. BEARD: You asked the question.

MR. ERICK: I'm not being -- I'm not being -- listen, I don't understand. I mean, you're defensive. I'm not being condescending. I am not. Okay. You just said a certain, whatever you just said, and let me respond.

Listen, you're asking nothing but hypothetical questions of a fact witness. He has not -- he has not been designated to give any opinion about any legal issue in this case.

MR. BEARD: I'm calling this.

MR. ERICK: I'm trying -- I'm trying to respond to you.

MR. BEARD: I'm not interested.

MR. ERICK: Well, what is -- what is --

MR. BEARD: I'm not interested.

MR. ERICK: You're aggravated for -- over nothing.

MR. BEARD: No, I -- look, I --

MR. ERICK: You're asking him hypothetical questions, and he's a fact witness.

MR. BEARD: We have sat here for four hours or -- no, three hours.

MR. ERICK: Ty, if you want to end it, that's fine. That's up to you. You're asking hypothetical questions of a fact witness who has not been designated to give any opinions in this case. He's not going to be designated to give any expert opinions or legal opinions in this case. They're not necessarily proper questions. They're hypothetical questions. You're asking him --

MR. BEARD: What did you mean when you said that as hypothetical?

MR. ERICK: You're -- you're --

MR. BEARD: Seriously? That's what you're

saying?

MR. ERICK: I don't understand. I don't know why we can't communicate about something this simple. He's -- you're asking him to guess.

MR. BEARD: I asked you a very simple question.

MR. ERICK: You're asking him to guess; that's why they're problematic. You're asking him what other people will think or could think. You're asking him to guess.

MR. BEARD: You're mischaracterizing what I've asked.

MR. ERICK: He's a fact witness. You can ask him factual questions about what he knows, but you're asking --

MR. BEARD: He doesn't --

MR. ERICK: Okay.

MR. BEARD: Casey, other than what's your name and where do you work, I think almost literally every question he's answered is, I don't know. Now, you know, look, I --

MR. ERICK: That's -- that's the reason -- that's --

MR. BEARD: That's nonresponsive. Just that simple.

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MR. ERICK: You're asking him questions, you're asking him to guess. You're asking him, wouldn't other people feel this way? He doesn't know that. You're asking him what people think. He doesn't know.

MR. BEARD: I've asked him what he thinks, and he doesn't know.

MR. ERICK: He doesn't know because you're asking him -- it's a hypothetical.

MR. BEARD: I've asked him what he meant when he said this and he doesn't know.

MR. ERICK: You're saying if you had X, Y, Z, and so on, would you think this, or wouldn't it be weird if you thought this, or if you didn't think this. These are your -- you're asking him to guess these questions. That's why he -- that's why his answers are the way they are.

MR. BEARD: We're done.

MR. ERICK: Okay. All right.

MR. BEARD: We're done.

THE VIDEOGRAPHER: And we're going off the record at 2:32.

MR. ERICK: All right. I guess we're done.

MR. BEARD: No, we're not done. We're not done. Strike that.

MR. ERICK: Okay.

MR. BEARD: Oh, really.

MR. ERICK: I don't know what we're doing here. You got me --

MR. BEARD: I said we're not done. I misspoke about 32 seconds ago. I hope it wasn't too inconvenient.

MR. ERICK: No, I just -- let's go.

THE VIDEOGRAPHER: Do you want to go back on the record?

MR. ERICK: Do you want to take a break or something? Five minutes? Okay. All right. Let's take a quick break.

(Break taken from 2:33 p.m. to 2:39 p.m.)

THE VIDEOGRAPHER: And we're back on the record. The time is 2:39.

Q. (BY MR. BEARD) Do you know what polygon.com is?

A. I think it's a newspaper or article company, like a news outlet.

Q. Have you ever had any communications with polygon.com or anyone associated with polygon.com?

A. I'm not sure.

Q. Have you ever made any comments on any -- on any forum or posting on polygon.com?

A. I can't remember if I have or haven't.

Q. Do you know what Anime News Network is?

A. Yes. It's a website.

Q. animenewsnetwork.com; is that correct?

A. I believe so. I'm not sure.

Q. Yeah. Okay. What is animenewsnetwork.com?

A. It's a website.

Q. What kind of website?

A. One that has anime and news on it, and it -- and tracking actors. I don't frequent the website a ton.

Q. Devoted to anime?

A. Sounds like it.

Q. Okay. Does it have forums?

A. I believe so.

Q. Have you ever posted any comments on the forums?

A. I'm not sure. I can't remember if I have or haven't.

Q. Have you ever communicated with Anime News Network?

A. I'm not -- I'm not sure.

Q. Have you ever communicated with anybody involved with Anime News Network?

A. I'm not sure.

Q. Are you familiar with an article that was

titled Fixing the Staircase: Victor Mignogna's Sexual Assault Allegations and the Voice Actors Who Speak Out?

A. Sounds familiar, but I'm not sure.

Q. Do you recall reading such an article?

A. I'm not 100 percent sure, but it sounds familiar.

Q. Did you talk to anybody associated with this article, i.e., someone that might be writing it or something?

A. I am not sure. I don't know.

Q. Do you know if Monica Rial contacted them in any way?

A. I don't know.

Q. Well, do you know or not? I'm just -- is that a no?

A. No. That would be a no.

Q. All right. So as far as you know, you had no involvement in the article, Fixing the Staircase: Vic Mignogna's Sexual Assault Allegations and the Voice Actors Who Speak Out?

A. I don't know. I'm not sure.

Q. Do you know what gizmodo.com is?

A. I am not sure.

Q. Okay. Have you ever contacted -- if I were to represent to you that gizmodo.com is a website --

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A. Uh-huh.
Q. -- would you -- rephrase that.
I'll represent to you that gizmodo.com is a website that reports news in science fiction and the anime sector.
Have you ever contacted anyone associated with gizmodo.com?
A. I don't know.
Q. For any reason?
A. I don't know.
Q. Okay. Do you know who Beth Elderkin is?
A. Yes.
Q. Who is she?
A. I've heard her name. I don't know exactly who she is. I know I've seen her on Twitter and she's a reporter.
Q. Have you ever had any -- have you ever -- have you ever sent her any text messages?
A. Nope.
Q. Have you ever sent her any emails?
A. I'm not 100 percent sure. Maybe. I'm not sure.
Q. Would you have produced those emails to your attorney?
A. Yes.

Q. Have you talked to her on the telephone?
A. I believe I might have spoke to her on the telephone. I think so.
Q. How many times?
A. I don't know. Maybe once.
Q. What did you talk about?
A. I can't remember the exact contents of the conversation, but we spoke about, I believe, Monica's situation.
Q. Have you ever met her face to face?
A. No.
Q. This conversation that you may have had with her, was it related to an article she was writing for Gizmodo?
A. I don't know.
Q. Oh, yeah. And with regard -- yeah. With regards to gizmodo.com and any of the websites I've mentioned in the last few minutes, you haven't posted anything on any of their forums, have you?
A. I don't know.
Q. Have you commented on any of their articles or their other postings?
A. I don't know.
Q. Would you be surprised if someone were to turn something up showing that you did?

MR. ERICK: Object, form.
A. I don't know.
Q. (BY MR. BEARD) You don't know if you would be surprised?
A. No.
Q. Do you go to anime conventions?
A. Occasionally.
Q. How many have you been to in the last -- since January 1st of this year?
A. I'm not sure. Four or five, three, somewhere in there.
Q. What's the last one you went to?
A. I can't recall.
Q. You don't remember the last anime con -- convention you went to?
A. That's correct. I don't recall.
Q. Do you know any -- do you know any organizers of conventions, or owners or managers of conventions, related to anime and science fiction?
A. I've met a few.
Q. Who are they?
A. I don't recall all their names, but I know I've met Chris Slatosch.
Q. Okay. Anybody else?
A. Managers and owners, that's -- I've met a

bunch. I don't know all their names.
Q. Did you send text messages to Chris Slatosch?
A. Yes.
Q. Did you state in those text messages that charges had been filed against Vic Mignogna?
A. I don't know.
Q. Did you imply that?
A. I don't know. I can't remember.
Q. Can you remember anything you said about Vic Mignogna?
A. That he assaulted my fiancee and a few of my close friends.
Q. Okay. Did you urge him to drop Vic Mignogna as a -- as a -- as a celebrity -- scratch that.
What do they call them?
MS. CHRISTIE: Guest.
Q. (BY MR. BEARD) Guest, yeah. Sorry.
A. No.
Q. Let me rephrase that.
Did you urge him to terminate his -- terminate Vic Mignogna's appearance at Kameha Con?
A. No.
Q. Didn't suggest that he do that?
A. Not that I can think of.
Q. Did you threaten him with any consequences if

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he failed to do that?

A. I didn't threaten him at anything.

Q. Did you say that you would withdraw financial support if Vic Mignogna continued to be a guest?

A. There was some parts of that text message where he had not messaged me back in 10 days, never gave me a sponsorship package, any information about anything, so with that, and in addition to a man being there that assaulted my fiancee, I wasn't going to engage with the conversation anymore, but there had never been any talks of any monetary benefit, any -- any sort of packet whatsoever.

Q. As I recall, you gave one instance of a sexual assault, purportedly, of Monica Rial; is that correct?

A. What do you mean?

Q. You gave one account of Monica Rial purportedly being sexually assaulted by Vic Mignogna; is that correct? It was in the hotel room, etc. I mean, I can go back if we -- we can -- we can rehash --

A. I don't remember.

Q. Okay. Tell me about the sexual assault that you believe occurred by Vic Mignogna on Monica Rial.

A. Tell me about it?

Q. Tell me what she told you happened.

A. She told me that he invited her up to his room,

wanted to show her something. She went up there. He, then, grabbed her, kissed her, threw her on the bed. And then -- I think a guy's name was Stan, came and knocked on the door and saved her.

Q. Okay.

A. He pinned her down.

Q. Is that the only incident she ever told you about involving Vic Mignogna and what you would characterize as assault?

A. She has mentioned that he's pulled her hair, similar to Jamie, before.

Q. Okay. Anything else?

A. Getting close -- too close to her, inappropriate kind of hugging. But that's -- yeah. Just frequent hair pulling.

Q. Was there ever an incident involving a jelly bean that was thought to be an assault?

A. The first time I heard of that story was a guy on YouTube -- Face -- Twitter, named Nick Rekieta brought that up, so that's the first I heard of it. But, yeah, then she told me that happened.

Q. You referred to the Funimation investigation numerous times on Twitter, didn't you?

A. I'm not sure.

Q. Okay. Did you ever -- did you ever make any

statements about what specifically was being investigated, i.e., who was being investigated and what they purportedly did?

A. I'm not 100 percent sure.

Q. Okay. Go to page 179 of Exhibit 28, please.

A. Sure.

Q. Read the text of that tweet, please.

A. She didn't hide behind it. That's why he is fired from every major studio. She presented, and now he is gone. That can't share all the details. Fans are upset. I get it. But being rude is not the play here.

Q. Who are you talking about in this tweet?

A. I'm not sure.

Q. Was it Vic Mignogna?

A. Could be.

Q. What kind of studios is this referring to?

A. I'm not sure. Depending on who it was, certain time periods throughout this you can see that I've talked about Bill Cosby, who is also an actor, who's been fired; Harvey Weinstein, who is involved in the entertainment industry, who's lost a lot of respect. So I'm not sure.

Q. Do you know who tonyshadowmoon is?

A. Not that I can think of.

Q. @tonyshadowmoon or @deku_a?

A. Not that I can think of. Again, in that time period I was receiving more tweets per day than Clint Eastwood, Joe Pesci, and a couple of other actors I looked up. It was -- I was under assault and harassment, so I don't know who most of these people that were attacking and harassing me were.

Q. So this could be about Bill Cosby?

A. Very possible.

Q. Okay. If you would, take a look at page 1.

A. Page 1?

Q. Yep. I've represented to you that these are tweets.

A. Uh-huh.

Q. What's the date on that tweet?

A. January 23rd.

Q. Okay. Look at page 342.

A. Yes.

Q. Okay. Assuming that you actually sent all these tweets, would you agree with the statement that between January -- January 23rd and April 4th, you sent approximately 342 tweets regarding Vic Mignogna?

MR. ERICK: Objection, form.

A. I'm not sure.

Q. (BY MR. BEARD) Do you know how many -- you have no idea how many tweets you sent about Vic

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Mignogna?

MR. ERICK: Objection, form.

A. No, not exactly.

Q. (BY MR. BEARD) Okay. Did you -- did you tweet a lot about Vic Mignogna?

A. I was under constant barrage and attack --

MR. BEARD: Objection, nonresponse.

Q. (BY MR. BEARD) Did you tweet a lot about --

A. -- so I had --

MR. ERICK: Go ahead. Let him finish.

A. I was under constant attack and harassment, being called names, being attacked, harassed, relentlessly.

Q. (BY MR. BEARD) I didn't ask that question.

A. So I responded.

MR. ERICK: Hold on, hold on. Let him ask you a question. Go ahead.

Q. (BY MR. BEARD) I didn't ask that question. I asked you if you tweeted a lot about Vic Mignogna.

A. I don't know if it was exactly about Vic Mignogna, but I know I was under a constant attack and having to reply to people.

MR. BEARD: Objection, nonresponsive.

Q. (BY MR. BEARD) Would you think it unusual if someone were to send -- were to tweet, say, 340 times in

a couple of months about one person they claimed to hate?

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) Well, I mean, do you think it unusual?

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) Yes or no? I mean, that is kind of a yes-or-no thing.

MR. ERICK: Objection, form.

A. I don't know.

Q. (BY MR. BEARD) Is it unusual for someone to do that?

A. For me, in this situation, I was under attack. I was getting tweeted at --

MR. BEARD: Objection, nonresponsive.

A. -- so --

Q. (BY MR. BEARD) You're not obsessed with Vic Mignogna, are you?

MR. ERICK: Objection to form.

A. No.

Q. (BY MR. BEARD) You don't have a crush on him or anything?

A. No.

Q. Let's see. Have you tweeted about any GoFundMe

accounts in the last six months?

A. Possibly.

Q. Do you remember tweeting about any GoFundMe accounts in the last six months?

A. Vaguely.

Q. Remember what you said?

A. No.

Q. Okay. Does Vic Mignogna have a GoFundMe project currently?

A. I found out that, yesterday after watching the deposition, that he does, in fact, have one, but he doesn't even know what's going on or where the money goes. So, yeah, he does have one.

Q. Okay.

A. Yeah.

Q. Yeah. So go to page 209.

A. Sure.

Q. Sorry. 269. 289. Hold on. Hold on. Let's us look first. Okay. Yeah. Yep. Look at 289, please, page 289.

A. Cool.

Q. Read the tweet, please. I'm sorry, read it out loud.

A. Nope. We don't delete it, but I am going to have them review this entire situation. I welcome a

case in court. I just don't need fans to fund it.

Q. What were you talking about?

A. I'm not sure.

Q. You don't know what "it" is?

A. It depends on the content of -- the context of the conversation.

Q. I'm just asking, you said I just don't need fans to fund it. What "it" are you referring to?

A. Maybe a case in court.

Q. You're not referring to a GoFundMe?

A. I'm not sure.

Q. Go to page 291. Read that out loud, please.

A. No, she isn't. You all will see, and you have no idea the depth of this. The info in the article is just the tip of the iceberg. He is asking fans to pay for his legal help. Hilarious. I will donate to it to prove a point. He knows what he did, admits it, and now it's on.

Q. Well, who's this about?

A. I'm not sure.

Q. Do you think it was about Vic Mignogna?

A. Possible.

Q. But not sure?

A. Not sure.

Q. Do you know anybody else that's asking fans to

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pay for their legal help?

A. Not to my knowledge.

Q. Do you think Vic Mignogna asked his fans to pay for his legal help?

A. Yes, he did.

Q. When?

A. When he endorsed it, when he said that, my friend set this up, and I appreciate the outpouring. So by his endorsement, he approved the asking of it.

Q. Make sure I understand this.

A. Sure.

Q. A statement that says 'I appreciate anything you want to do' is equivalent to 'Please give me money'?

MR. ERICK: Objection, form.

A. Maybe.

Q. (BY MR. BEARD) In your opinion.

MR. ERICK: Objection, form.

A. Depends.

Q. (BY MR. BEARD) Okay. When did you find out about Vic Mignogna's GoFundMe again?

A. I'm not sure.

Q. I thought you just said a moment ago that you just found out yesterday.

A. Oh, I thought you were meaning date.

Q. Approximately's fine.

A. I said I -- I -- when -- can you clarify what you just said?

Q. When did you find out that Vic Mignogna had a GoFundMe dedicated to his legal expenses?

A. So I didn't -- what I mentioned was I heard yesterday that Vic endorsed that he approved Nick, but doesn't realize where the money is going, where it's spent, how it was set up.

MR. BEARD: Objection, nonresponsive.

A. But I heard about it from Nick.

Q. (BY MR. BEARD) When did you find out about Vic Mignogna's GoFundMe?

A. I'm not sure exactly.

Q. Was it a week ago?

A. No.

Q. Was it a month ago?

A. I'm not sure. I don't know.

Q. Okay. Let's see. Turn to 301, please. No. I'm sorry. 294. Excuse me. Read that out loud, please.

A. Sure.

I am not worried about him being lawyered up. Smiley face. I was only speaking towards me sharing a post that was later found to be fake. I don't stand for falsified evidence. Smiley face. I welcome a

case. It's just sad Vic has to use fans to pay for it.

Q. Is that Vic Mignogna?

A. Could be. It sounds like it.

Q. Okay. How is he using fans to pay for it -- well, first of all, let me back up.

What is being paid for?

A. What is being paid for?

Q. Yeah. In this -- you're referring -- you said to pay for "it." What is it?

A. What the GoFundMe account is set up for, it seems like.

Q. If I could -- is it the GoFundMe account?

A. Let's see. I'm not sure exactly, but it seems, based on this, it could be.

Q. Oh, no, I'm sorry, you're right, you're right, you're right.

It is the -- is his legal expenses; is that correct?

A. Seems like that's what it is, yes.

Q. Okay.

A. For -- on the site it says his legal defense, not offense.

Q. And you state he used -- he has to use fans to pay for it.

How he is using fans?

A. With -- in my opinion, based on what I read on the GoFundMe page, that this is for Vic's legal defense. He's using fans because it's not meant to defend himself, it's meant to go after people that come forward and try to silence victims. So in my opinion, that is what it is.

Q. Could it be for the defense of his reputation?

A. I don't know.

Q. Just asking if it's possible.

A. I don't know.

Q. You don't know if it's possible?

A. I'm not sure.

Q. Okay. Have you ever stated that Vic Mignogna was stealing from fans?

A. I don't know.

Q. Did you ever tweet anything out about that?

A. I'm not sure.

Q. Yeah, I know.

Let me see. Which one? Do you remember? Here we go.

Would you read number 297, please?

A. Sure.

Q. I'm sorry. Read it out -- assume that I'm saying read it out loud unless I specifically say read it silently.

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A. Okay.
Q. So please read it out loud.
A. Ask yourself this: What if he doesn't take one person to court? What will you think when I make a donation to his GoFundMe with the hopes we go to court to prove to the world who he is? If he takes no one to court, he stole fans' money, 100K in legal fees. Come on.
Q. Who are you talking about?
A. It sound -- I'm not sure in this tweet, but it sounds like Vic.
Q. Well, I mean, if he -- if he takes no one to court, does that mean sue someone?
A. I'm not sure.
Q. Okay. What have your legal fees amounted to up to this point in this case?
A. I don't recall.
Q. More than $10,000?
A. Yes.
Q. More than $20,000?
A. I'm not sure.
Q. More than 30,000?
A. I'm not sure.
Q. More than 40?
A. I don't know.

Q. A hundred thousand in legal fees, does that seem exorbitant to you to sue people for defamation?
A. I don't know.
Q. Okay. If someone chooses to believe Vic over Monica Rial regarding the allegations that she's made, does that constitute harassment of Monica Rial?
MR. ERICK: Objection, form.
A. I don't know.
Q. (BY MR. BEARD) Do you think it's harassment?
MR. ERICK: Objection, form.
A. I don't know.
Q. (BY MR. BEARD) If they say, I don't believe her, is that harassment in your opinion?
MR. ERICK: Object to form.
A. I don't know.
Q. (BY MR. BEARD) Okay. Have you ever claimed that supporting Vic constituted harassment?
A. I'm not sure.
Q. Okay. Do you believe everything you read on the internet?
A. No.
Q. Do you believe everything negative you read about Vic on the internet?
A. No.
Q. What's something you've read about him,

negative, that you didn't believe?
A. I'm not sure. I can't recall.
Q. So you really can't answer no, then, right?
MR. ERICK: Objection, form.
A. I can say maybe no.
Q. (BY MR. BEARD) Which is it?
MR. ERICK: Objection, form.
A. Repeat your question.
MR. BEARD: Would you read that back?
(Question read back.)
A. There's been so many things that have gone back and forth and all over the -- again, you're seeing an -- accounts of 342 tweets that you're saying that I did in response to people coming at me and harassing me. I can't remember. But I don't believe everything that everyone says about him.
Q. (BY MR. BEARD) But you can't -- if I'm hearing you correctly, you can't give me an example of anything negative you read about him that you didn't believe?
A. Not at this time, but there are things that I'm sure that I've, in my mind, said maybe it's not true.
Q. I believe you've said this, but do you believe the accused has a right to be heard?
No, I'm sorry, you haven't said that. My bad. Scratch that.

Do you believe that someone accused of a sexual crime has the right to be heard in public?
A. Yes.
Q. Do you believe they have the right to post on Twitter that they didn't do it?
A. Yes.
MR. ERICK: Object, form.
THE WITNESS: Oh, sorry.
MR. ERICK: That's all right. Go ahead.
Q. (BY MR. BEARD) You can answer.
Do you believe that they have the right to say on Twitter that their accuser is not telling the truth?
A. Yes.
Q. And do you agree that saying, I didn't do it, that person is lying --
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) -- on Twitter? That's okay? You don't have a problem with that?
MR. ERICK: Objection, form.
A. Depends.
Q. (BY MR. BEARD) I'll reask it a different way.
Do believe it is wrong of someone accused of a sexual crime to say on Twitter, I didn't do it?
MR. ERICK: Objection, form.

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A. No.
Q. (BY MR. BEARD) Okay. Do you believe it's wrong of someone accused of a sexual crime to say on Twitter, My accuser is lying?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Do you think it is wrong for some -- for a friend of someone accused of sexual assault to say he didn't do it --
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) -- on Twitter?
MR. ERICK: Objection, form.
A. No -- yeah. No.
Q. (BY MR. BEARD) Do you think it's wrong for a friend of someone accused of a sexual crime to say the accuser is lying?
MR. ERICK: Objection, form.
A. No.
Q. (BY MR. BEARD) Do you think it is wrong for a friend of an accuser to give -- sorry, scratch that -- for a friend of someone accused of a sexual assault to give money to their friend to pay for his legal expenses --
MR. ERICK: Objection, form.
A. I don't know.

Q. (BY MR. BEARD) -- related to the accusation of sexual assault?
MR. ERICK: Objection, form.
Q. (BY MR. BEARD) You can answer.
A. I don't know.
Q. You don't know if that's right or wrong?
A. Depends on the circumstances.
Q. When would it be wrong?
MR. ERICK: Objection, form.
A. I'm not sure.
Q. (BY MR. BEARD) Okay. To be clear, you're not saying -- and, again, I don't want to put words in your mouth. You're not saying there's anything wrong with Vic's supporters saying I don't believe Monica Rial?
A. I have no problem with that.
Q. Okay. Do you have any problem with them saying not only do I not believe Monica, I think she's lying?
A. No.
Q. I mean, other than the obvious problem of being in a romantic relationship, but I understand that, but --
In the last -- well, since January 25th, let's say it that way, what's been the most common thing you've tweeted about?
A. I'm not sure.

Q. Prior to January 20th of 2019, how many times had you tweeted about Vic, if any?
A. I have no idea.
Q. Do you recall tweeting about Vic in 2018?
A. No, not that I can think of.
Q. Have you ever used the hashtag, #kickvic?
A. I don't remember. Maybe.
Q. Do you have any memory of using the hashtag, #kickvic?
A. There's a possibility. I cannot remember.
Q. So is that a no?
A. It's a maybe.
Q. Have you personally witnessed a single assault, as you define that term, by Vic Mignogna, against anyone?
A. I've seen him hug inappropriately, fans at conventions, yes.
Q. Tell me about one of those incidents, please.
A. Sure. Grabbing a fan and wrapping his legs around her and hugging her.
Q. Wrapping his legs around her?
A. Yes. Like full-on body hug.
Q. Okay. Where was this?
A. It may be at Florida Supercon. I think that was where it was at.

Q. Was it in front of a bunch of fans?
A. Yes. It was at his autograph line.
Q. So he walked up and hugged a fan?
A. No. She came up.
Q. Okay. He hugged her?
A. Uh-huh.
Q. And you thought that was inappropriate?
A. The way he did it with the girl, not sure how old she was, absolutely.
Q. Did you ask her?
A. No. Neither did he.
Q. Did you -- I didn't ask about that. But that's fine. Did you ask her if she felt uncomfortable?
A. I was helping Monica.
Q. That's not my question. Did you ask her if it was --
A. No.
Q. If she -- okay. So you didn't ask her if she felt it was uncomfortable, but you decided that it was inappropriate; is that correct?
A. In my opinion, yes.
Q. In your opinion. How do you know you're right in a situation like that?
A. I'm not sure. Just an opinion.
Q. All right. Do you know if the person -- if

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this purported victim's parents were there with her?

A. I don't know.

Q. You didn't bother to check?

A. Nope.

Q. Okay. Any other inappropriate occurrences that you can think of?

A. Not that I've seen personally.

Q. Okay. I want to make this clear. Are you saying the only one that you can remember is this one you just -- you just accounted for?

A. In person?

Q. Yeah.

A. Yes. That's the only one in person.

Q. Have you stated that Vic Mignogna committed sexual assault publicly?

A. I'm not sure. Maybe.

Q. If you had said it -- if you had tweeted that, would you agree that's a public statement?

MR. ERICK: Object, form.

A. I guess, yeah.

Q. (BY MR. BEARD) Okay. Have you told other people verbally that Vic Mignogna has sexually assaulted anyone, besides Monica and Jamie, and the twins, and XXXX XXXXXXXXX?

A. And the people that have come forward online

that -- are you talking about those things?

Q. Yeah. Besides the ones that you mentioned, that you have specific knowledge of --

A. Right.

Q. -- have you told anybody that he assaulted other people?

A. Not that I can think of.

Q. Okay. You did say you had hundreds of women who were going to come forward publicly, didn't you?

MR. ERICK: Object, form.

A. It -- there --

Q. (BY MR. BEARD) To -- to talk about Vic Mignogna's purported sexual assault?

MR. ERICK: Objection, form.

A. Yeah, after doing my research online, looking up different things, there have been way -- plenty, way more than hundreds of women.

Q. (BY MR. BEARD) But did you talk to all of these women?

A. No.

Q. How many of them did you talk to? Let me rephrase that.

Did you communicate with any of them?

A. No. But based on my belief, and also understanding of what happened to Monica, XXXXX and

XXXX, XXXX XXXXXXXXX, Jamie Marchi, those stories resounded and corroborated the stories that they -- their testimony that they gave me, so it corroborated it, so I believe them.

Q. So not to be pedantic, but you said they were going to come forward.

Did you -- what did you mean by that?

A. Well, they have come forward. They posted their stories of him.

Q. Oh, when you -- okay. So if I'm hearing you correctly, when you said that they'll come forward, it wasn't in this case, it was just they were going to come out in public?

A. They have or could. It's hypothetical.

Q. Well, no, I mean, didn't you say --

A. And there have been.

Q. -- that hundreds of women would come out?

A. I don't know.

Q. You don't know.

MR. ERICK: Object, form.

Q. (BY MR. BEARD) Did you say thousands of women were going to come forward and corroborate assaults --

MR. ERICK: Objection, form.

Q. (BY MR. BEARD) -- made by Vic Mignogna against --

MR. ERICK: Sorry. Objection, form.

A. I don't remember if I said that, but I know that after my research and what he's done to XXXXX and XXXX, XXXX XXXXXXXXX, Monica, Jamie Marchi, and then I find out from more and more people throughout this case, him admitting he's failed to ask consent at conventions on multiple occasions, it's not hard to reasonably deduce that thousands is not an unreasonable number. There's mountains and mountains and mountains of testimonies online of their personal accounts: I was 16, Vic creepily kissed me, put his hand up my dress.

MR. BEARD: Nonresponsive. That's enough, please. We need to get --

MR. ERICK: Go ahead and finish.

A. Put his hand up my dress, touched my boobs in an elevator, kissed me, pulled my hair, mountains and mountains of testimony online.

MR. BEARD: Objection, nonresponsive.

(Exhibit 25 previously marked.)

Q. (BY MR. BEARD) I'm handing you Exhibit 25. Just keep the book there. I'll represent to you that that was an exhibit produced in Vic Mignogna's deposition by your counsel.

Have you ever seen that document before?

A. I believe so. Maybe.

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Q. Okay. What is it?
A. This is a -- what do we call this exhibit?
Q. It's got a number at the bottom, 25, I believe.
A. Oh, yeah. This is Exhibit 5. It reads prettyuglylittleliar.net.
Q. Okay. I apologize. We didn't make extra copies of this. We're going to have to bat this back and forth.
THE REPORTER: I have it from yesterday.
MR. BEARD: Oh, do you? Oh, great. Sorry. Would you hand him 25, please.
THE WITNESS: Thank you, ma'am.
Q. (BY MR. BEARD) All right. Let's look at --
A. Wow.
Q. Okay. Sorry. Little confusion on our side. Tell me, again, what this is.
A. Exhibit 25.
Q. Right. And do you recognize the document --
A. It looks familiar.
Q. -- the contents of the document?
A. Yes.
Q. What do you recognize it as?
A. It shows at the bottom prettyuglylittleliar.net. And --
Q. What is that?

I'm sorry. I interrupted you. I didn't mean to do that. I'll ask that later.
A. It is a website.
Q. Okay. I'm sorry. My bad. Go back and tell us what this document is, please.
A. Exhibit 25?
Q. Right.
A. Vic Mignogna allegations supporting or relevant information to those allegations.
Q. Okay.
A. It's an allegation, Document 25.
Q. Did you have any involvement in preparing this document?
A. I don't know. I don't remember.
Q. Okay. Go to page 2.
A. Sure.
Q. There's a section at the bottom titled: Allegation.
A. Yep.
Q. What does the word allegation mean to you?
A. What somebody's testimony or what they're saying happened to them.
Q. Okay. Look at the first name, sharonbtw@sharonB89188965.
A. Okay.

Q. Who is that?
A. I'm not sure.
Q. Okay. And that name -- that allegation is duplicated one, two, three times more, correct?
Well, yeah, I mean, twice on this page --
A. Right.
Q. -- on page 2.
A. I think --
Q. And once on page 3.
A. I think it's better clarifying different things than showing corroborated proof that this is about the timeline.
Q. I appreciate the suggestion, but can you confirm that sharonbtw@sharonB89188965 appears on that page?
A. Yes.
Q. Okay. There's a paragraph below that name. Are these paragraphs allegations against Vic Mignogna?
A. It's in that section, it's addressing the rumors and accusations and allegations, so it seems to be.
Q. Do you believe this allegation, this one on the top of page 3?
A. Yes.
Q. Why?

A. Because of after hearing what happened to Monica Rial, XXXXX XXXX, XXXX XXXX, XXXX XXXXXXXXX, Jamie Marchi, and the girls that come up in convention lines that mention it, online research, YouTube videos, Vic's own testimony saying he's messed up, he needs help, psychological help, it leads me to believe that this person is being honest in that situation.
Q. But you don't know who this person is, right?
A. Nope, don't know them.
Q. If you don't know who she is, how do you know she even exists?
A. I don't know. They have provided a ton of links.
Q. Who are they?
A. Whoever that is.
Q. Whoever what is?
A. sharonbtwsharonB89188965, and michelemc73, that's who she's replying to.
Q. I'm sorry. What page are you looking at? I was looking at the top of page 3.
A. Page 2.
Q. Go to page 3 and look at the top.
A. Page 3?
Q. Yeah.
A. She's replying to a few different people.

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Q. Okay. Yeah, I get that.
A. Yeah.
Q. So do you know who @boopidoo88 is?
A. No, I don't know them.
Q. Do you know who @davidlaus1 is?
A. No, I do not know them.
Q. Do you know if either of these people -- and I put that word in quotes.
A. Uh-huh.
Q. Do you know if either of these people exist?
A. They've made posts, so I don't know or not.
Q. Do you know if they -- whether or not they are actual live people?
A. I'm not -- I'm not sure.
Q. Not sure. But you believe them?
A. Yes.
Q. You didn't bother to verify that they exist; is that correct?
A. Nope.
Q. Did you bother to verify anyone listed in the section called Allegation, on page 2, any of these names that begin with an at symbol?
MR. ERICK: Object to form.
A. I reviewed them.
Q. (BY MR. BEARD) How did you verify that they

existed?
A. I clicked on the links, and it looks like those are pretty solid links.
Q. Describe what a pretty solid link is.
A. Corroboration of the timeline.
Q. But, I mean, did you ever talk to any of these people?
A. Not that I know of.
Q. Did you ever exchange emails with them?
A. No, not that I know of.
Q. Did you ever exchange text messages?
A. Not that I know of.
Q. So you clicked -- your words, you clicked on a link and decided that they exist?
MR. ERICK: Object, form.
Q. (BY MR. BEARD) That's a question. I'm sorry. I didn't frame it as a question.
A. Yeah.
Q. Is that what you're saying?
MR. ERICK: Object, form.
A. Yeah.
Q. (BY MR. BEARD) Really?
A. Uh-huh.
Q. Okay. Let's see, let's see, let's see. Okay. Okay. Are these some of the hundreds of

people you were referring to earlier who were going to come out and accuse Vic?
MR. ERICK: Object, form.
A. These would be examples of a very small microcosm of what I've seen, but this represents -- I mean, it looks like hundreds on this page.
Q. (BY MR. BEARD) I said some of them.
A. Yes. So this would be a very small microcosm of the hundreds.
Q. What website was this taken from again?
A. Exhibit 25 reads prettyuglylittleliar.net.
Q. And tell me again what that is.
A. It's a website, a forum, I think.
Q. Have you accessed that forum?
A. I have seen this, yes.
Q. Did you -- did you pull these links? Did you copy these links from the forum?
A. I looked at the links. I clicked on them, yes.
Q. No. Did you copy them and provide them to your lawyer or someone else?
A. I think I sent them the hyperlink.
Q. Okay. Okay. Okay. What is a liar?
A. That's a broad statement. I don't know exactly the definition. Somebody who --
Q. You don't know the definition of the word liar?

A. Somebody who is not telling the truth, the whole truth, maybe withholding some evidence. I mean, potential truth, potentially.
Q. So a website that includes, in its name, liar, you find that credible when they attack Vic?
MR. ERICK: Objection, form.
A. Yes.
Q. (BY MR. BEARD) You find any account on that website that says, Vic did something wrong to me, credible even though it says liar?
A. Especially when you take into account --
Q. Yes or no.
A. -- what happened to my personal fiancee --
MR. BEARD: Objection, nonresponsive.
A. -- yes, without question I believe these people.
Q. (BY MR. BEARD) Okay. So it sounds like, and I don't want to unfairly characterize your statement, you would agree with anyone who accused Vic Mignogna? I'm sorry. Scratch that.
You would -- you would find anyone who accused Vic Mignogna of sexual assault to be credible, and you would believe them; is that correct?
MR. ERICK: Objection, form.
A. No.

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Q. (BY MR. BEARD) Really?
A. Not necessarily.
Q. Okay. You would find anyone on prettyuglylittleliar.net who accused Vic Mignogna of sexual assault to be credible; is that fair?
MR. ERICK: Objection, form.
A. I'm not sure. There's a lot of links here. I haven't clicked on those so I can't speak to them.
Q. (BY MR. BEARD) But you provided these links, did you not, to us?
A. Provided the actual link to prettyuglylittleliars, and this is other stuff is what came with it.
Q. But are you aware that you provided this to us in discovery?
A. Yes. Yes.
Q. And that by providing it to us in discovery --
A. Yeah.
Q. -- you've authenticated it and said, Yep, that's --
A. Yes.
Q. Okay. Let's see. Yeah. Go on page 5, please.
A. Okay.
Q. I'm trying -- well, actually, look on 4, at the very bottom.

A. Okay.
Q. Is Monica Rial the voice actor named Charlotte?
A. I don't know.
Q. There was an article on io9 talking -- oh, yeah. Scratch all that.
There's a link at the very bottom of page 4. It's to io9.gizmodo.com. Would you agree?
A. That is there.
Q. Okay. And there -- that is a link that you provided?
A. Uh-huh.
Q. Click on that link, what comes up?
A. I'm not sure right now.
Q. Is it perhaps an article talking about Vic -- the accusations about Vic Mignogna?
MR. ERICK: Object, form.
A. It seems like it.
Q. (BY MR. BEARD) Okay. Did you read such an article from io9 and Gizmodo?
A. I believe I've read the io9 article, yes.
Q. Is Monica Rial the voice actor named Charlotte in that article?
A. I do not remember if Monica is Charlotte. It's been a long time --
Q. Is Monica any of the people in that article?

A. Yes.
Q. Okay. So she -- also, take a look at the hyperlink at the bottom of 4.
A. Uh-huh.
Q. And then flip over to 5.
A. Uh-huh.
Q. There are any number of links with two asterisks. What does that signify?
A. Oh, it's -- the two asterisks. Identity unconfirmed.
Q. What does that mean exactly?
A. I don't know. It seems to be that their identities are unconfirmed. They wanted to be anonymous.
Q. It says unconfirmed, not anonymous, though, doesn't it?
A. Well, I would assume if somebody is unconfirmed, they didn't give their identity to something. So, yeah.
Q. Or that perhaps their existence hasn't been confirmed; is that possible?
A. No.
Q. Really? Why?
A. Not in my opinion.
Q. I'm asking why you believe that.

A. Because that's what I believe. I don't believe that people -- that they don't exist.
Q. Okay. Let's see. So go to page 5 at the very bottom.
A. Sure.
Q. Who is Karissa Barrows?
A. I'm not sure.
Q. You don't know anybody named Karissa Barrows?
A. Maybe. I don't know.
Q. Okay. Okay. So you don't recall talking to anyone named Karissa Barrows about Vic Mignogna, do you?
A. Not that I can think of.
Q. Who is -- I'm sorry. Go to the next page.
Who is convention staffer Mystery Corgi?
A. I'm not sure.
Q. Who is voice actress Samantha Inoue-Harte?
A. She's a voice actress.
Q. Have you ever talked to her about Vic Mignogna?
A. Not about Vic Mignogna.
Q. Have you ever had any communication with her about Vic Mignogna?
A. No, not that I can think of.
Q. Have you ever had any communication with her at all?
A. Yeah. I've seen her at a convention before.

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Q. But you've never discussed Vic Mignogna with her?

A. Not that I can think of.

Q. Who is -- I'm going to probably hash this -- Moises, C-H-I-U-L-L-A-N? Do you know that person?

A. No idea.

Q. Who is Katy Lynx?

A. Not sure.

Q. Who is Stacy?

A. Not sure.

Q. Who is Lyn Griffin?

A. Not sure.

Q. Who is Extermination?

A. Not sure.

Q. Who is Joe Kenner?

A. Not sure.

Q. Do you know any of the people left who are identified on this page?

A. Not that I know of.

Q. Okay. Let's go to the next page.

Who is DC Douglas?

A. He's a voice actor.

Q. Have you ever communicated with him in any way about Vic Mignogna?

A. Maybe on Twitter, replying to tweets.

Q. But no texting --

A. No.

Q. -- or voice mail --

A. I don't know him that well.

Q. -- I'm sorry -- texting or phone calls?

A. No.

Q. Okay. Who's Tara Jayne Sands?

A. I know she's another voice actress.

Q. Do you know her?

A. No.

Q. Okay. Who's the voice actor Jamie McGonnigal?

A. He's a voice actor, Jamie, and he's a friend.

Q. Have you talked to him about Vic Mignogna?

A. I can't remember.

Q. Does he work for Funimation?

A. Not that I am aware of.

Q. Is he an independent contractor for Funimation?

A. I think all voice actors are independent contractors. I'm not sure, but --

Q. Right.

A. -- I don't know. I don't know his work history.

Q. You don't know if he's had any employment with Funimation, is that what you're saying?

A. Correct. I have no idea.

Q. Fair enough.

A. He lives in Washington, DC.

Q. Have you had any communication with this Tara Jayne Sands about Vic Mignogna?

A. Not that I can think of.

Q. Do you know SungWon Cho?

A. I've met him. I don't know him very well.

Q. Who is he?

A. He's a voice actor.

Q. Have you talked to him -- or have you communicated with him in any way about Vic Mignogna?

A. Not that I can think of.

Q. Have you communicated with Neil Kaplan in any way about Vic Mignogna?

A. Maybe via Twitter.

Q. Have you -- is that all, just Twitter?

A. I believe so.

Q. Have you talked with Sean Schemmel about Vic Mignogna, talked, face to face?

A. Maybe. Potentially, yeah.

Q. Have you exchanged -- have you sent text messages or received text messages from Sean Schemmel about Vic Mignogna?

A. I'm not sure. Maybe.

Q. But you would have turned them over to your

counsel if you had?

A. Absolutely.

Q. Okay. Have you exchanged any -- or have you sent or received an email to Sean -- either sent an email to Sean Schemmel or received an email from Sean Schemmel regarding Vic Mignogna?

A. I don't think so. I can't remember.

Q. Okay. Let's see. Who's Donald A. Schultz?

A. Reads that he's a voice actor.

Q. But you don't know him?

A. I might have met this person in passing. I'm not sure.

Q. Okay. Have you exchanged any -- have you had any communications with him regarding Vic Mignogna?

A. Not that I can think of.

Q. Who's Andrea Romemo?

A. Not sure.

Q. Have you had any communications with her regarding Vic Mignogna?

A. I don't know.

Q. Who is Michele Specht?

A. I believe that's Vic's ex-fiancee.

Q. Have you had any communications with her about Vic Mignogna?

A. I don't -- no, I don't -- I'm not sure.

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Q. Who's Dawn M. Bennett?
A. That's another voice actress.
Q. Have you had any communication with Dawn M. Bennett about Vic Mignogna?
A. I don't think so.
Q. Would you look at this page, and excluding Monica Rial, Chris Sabat, any of the parties in this case, would you tell me how many of these people you actually know in the sense of what normal people would consider friendship, friends?
A. Uh-huh. Josh Grelle. He's a voice actor there.
Q. Okay.
A. That would be the remaining people on this page.
Q. Okay. Is it fair to say you don't know most of the people on this page?
A. Yes.
Q. Okay. But you're claiming, aren't you, that these people are accusing Vic of -- Vic Mignogna of sexual assault?
A. I don't know what they're accusing him of.
Q. I mean, you produced it.
A. I'm just saying in this document you're asking me a question, I'm not sure.

Q. Well, flip over to page 5. Look at the very bottom. There's a title there.
A. Yes.
Q. Read that, please.
A. A statement from Vic Mignogna --
Q. No, no, no. I'm sorry. Page 5.
A. Oh, page 5. That's 6.
Voice actors or industry professionals who support #kickvic or believe the accusations.
Q. Let me see that. Page 5, right?
A. I believe that's 5. 1, 2, 3, 4.
Q. No, I'm sorry. Look, right here. The page is right there after the exhibit number.
A. Oh, here is 5.
Voice actors or industry professionals who allege to have personally witnessed rude behavior towards convention staff or colleagues from Vic Mignogna.
Q. Okay.
A. So then that answer to your other question, I'm sorry, was no.
Q. Yeah. Well, that's that section at least. So would you agree that's -- that's the title for the section that begins at the very bottom of page 5 and goes through page 6, except for the very bottom?

A. That's what it looks like, yes.
Q. Okay.
THE VIDEOGRAPHER: You have one minute.
MR. BEARD: We can stop. Off the record, please.
THE VIDEOGRAPHER: We're going off the record at 3:37.
(Break taken from 3:38 p.m. to 3:49 p.m.)
THE VIDEOGRAPHER: And we are back on the record for the beginning of disc number 5. The time is 3:49.
MR. BEARD: Pass the witness.
MR. VOLNEY: I don't have any questions.
MR. JOHNSON: No questions at this time.
MR. ERICK: We'll reserve ours for trial. Thank you.
THE VIDEOGRAPHER: And we're going off the record at 3:49.

(Deposition concluded at 3:49 p.m.)

CHANGES AND SIGNATURE

WITNESS NAME: RONALD TOYE DATE: JUNE 27, 2019

PAGE LINE	CHANGE	REASON

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I, RONALD TOYE, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

_____
RONALD TOYE

THE STATE OF _____)
COUNTY OF _____)

Before me, _____, on this day personally appeared RONALD TOYE, known to me (or proved to me under oath or through _____) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, _____.

_____
NOTARY PUBLIC IN AND FOR
THE STATE OF _____
COMMISSION EXPIRES: _____

NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,	)	IN THE DISTRICT COURT
VS.	)	TARRANT COUNTY, TEXAS
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE, Defendants.	)	141st JUDICIAL DISTRICT

REPORTER'S CERTIFICATION
DEPOSITION OF RONALD TOYE
JUNE 27, 2019

I, Claudia White, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, RONALD TOYE, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature and return to CSI Global Deposition Services by _____;

That the amount of time used by each party at the deposition is as follows:

Mr. Ty Beard, Esq. - 04 HOURS:00 MINUTE(S)
Mr. Casey S. Erick, Esq. - 00 HOURS:00 MINUTE(S)
Mr. John Volney, Esq. - 00 HOURS:00 MINUTE(S)
Mr. Sam Johnson, Esq. - 00 HOURS:00 MINUTE(S)

That pursuant to information given to the

Deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

Mr. Ty Beard, Esq., and Ms. Carey-Elisa Christie, Esq. Attorney for Plaintiff
Mr. Casey S. Erick, Esq., Attorney for Defendants Monica Rial and Ronald Toye
Mr. John Volney, Esq., Attorney for Defendant Funimation
Mr. Sam Johnson, Esq., Attorney for Defendant Jamie Marchi

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule 203 of TRCP will be certified to after they have occurred.

Certified to by me this 30th day of June, 2019.

Claudia White
Claudia White, Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was/was not returned to the deposition officer on _____;

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition was delivered to Mr. Ty Beard, Custodial Attorney;

That $_____ is the deposition officer's charges to the Plaintiff for preparing the original deposition transcript and any copies of exhibits;

That the deposition was delivered in accordance with Rule 203.3, and that a copy of this certificate was served on all parties shown herein on and filed with the Clerk.

Certified to by me this _____ day of _____, 2019.

Claudia White
Claudia White
Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

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Exhibit 30

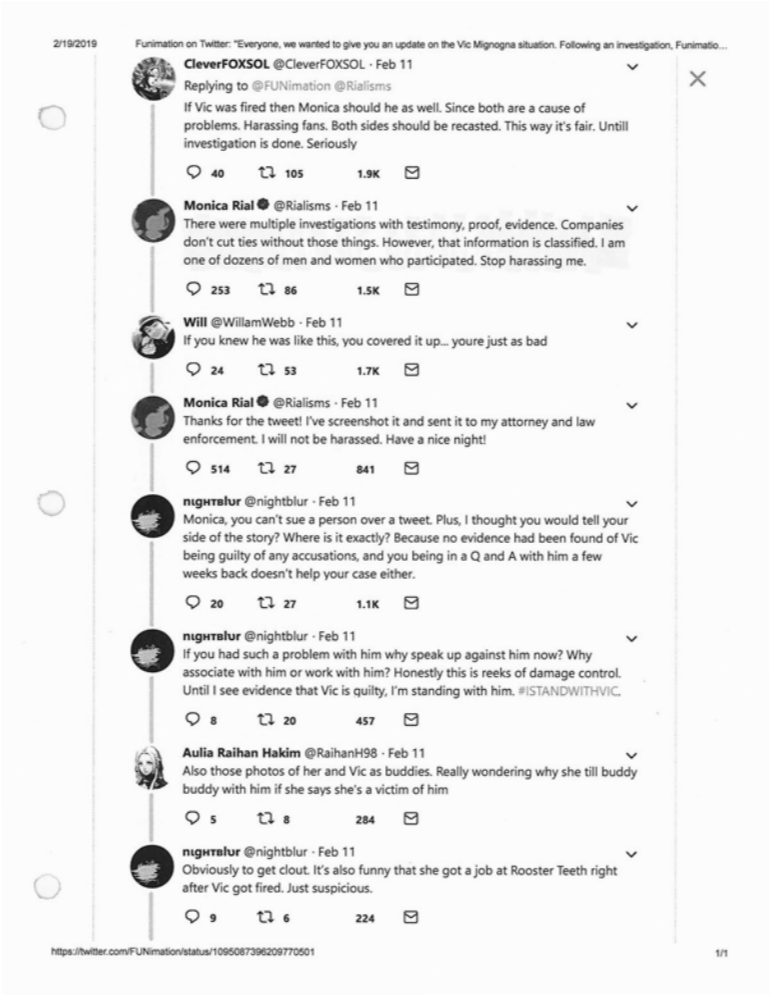

EXHIBIT 31
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 31

EXHIBIT 32
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 32

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Monica Rial ✓
@Rialisms

Follow

These last few weeks have been some of the hardest of my lifetime. Please understand that we are ALL hurting. No matter what you choose to believe, please be kind. <3

First, please know that I've tried to address his behavior with him. I'm the kind
I tell you when you have food in your teeth and I was tired of people talking ab
his back. How would he change if he didn't know his behavior was wrong? Eac
apologize and then be back at it within weeks. The studios slowly began to stop
n, not just because of sexual harassment, but because he was difficult to work
ough he had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, a
- so closely to my ear that his lips were touching or kiss my cheek/neck. This w
front of fans or colleagues so I had to be very careful about how I reacted. I di
ow inappropriate it was because he did it to so many people. I've witnessed
thers have witnessed it happen to me; colleagues *and* fans.

In the mid-2000s we were at a convention together and he grabbed me and ki
l room. I froze. You may wonder why I didn't yell or scream or push him away
Why? Because I was raped as a teenager and I learned that sometimes fighti
t worse. Why did I go to his room? Because he asked me to watch a video and
ause he was my friend. Not only that, but he was dating my friend Michele an
rting with my soon-to-be-boyfriend at the convention all weekend. After that
nce, I distanced myself from him and unfortunately Michele as well. I felt incre
ven though I hadn't done anything wrong. I went to therapy and worked on fo
to forgive him for what he had done. Maybe it was just me? Maybe it was a or
ver to be repeated again? You can imagine my devastation when I learned tha
r one. That it was happening to colleagues, and worse yet, convention attende

5:15 PM - 19 Feb 2019

2,347 Retweets **10,251** Likes

2.6K 2.3K 10K

Tweet your reply

MistareFusion @MistareFusion · 11h
Replying to @Rialisms
Thank you so much for coming forward and having the courage to endure all the slings and arrows, even though you should never have had to. God forbid, but if I ever found myself in such a situation, I hope I'd have the courage to stand up too. It's the only way to foster change.

1 1 38

1 more reply

Guy Hero @theman22022 · 14h
Replying to @Rialisms
Vic only wanted peace. He told his fans to not start anything. But then you started attacking him and his fans. So they fought back. And here we are. You lashed out at people who wanted the proof. Nothing has been shown. Until theres actually proof. No one will stop. Im stopping

EXHIBIT 33
WIT: M. Rial
DATE: 10/22/19
Claudia White, CSR

Exhibit 22

First, please know that I've tried to address his behavior with him. I'm the kind of friend that will tell you when you have food in your teeth and I was tired of people talking about him behind his back. How would he change if he didn't know his behavior was wrong? Each time, he would apologize and then be back at it within weeks. The studios slowly began to stop working with him, not just because of sexual harassment, but because he was difficult to work with. Even though he had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, and either whisper so closely to my ear that his lips were touching or kiss my cheek/neck. This was usually done in front of fans or colleagues so I had to be very careful about how I reacted. I didn't even realize how inappropriate it was because he did it to so many people. I've witnessed it happen, just as others have witnessed it happen to me; colleagues *and* fans.

In the mid-2000s we were at a convention together and he grabbed me and kissed me i his hotel room. I froze. You may wonder why I didn't yell or scream or push him away. I was scared. Why? Because I was raped as a teenager and I learned that sometimes fighting back makes it worse. Why did I go to his room? Because he asked me to watch a video and I trusted him because he was my friend. Not only that, but he was dating my friend Michele and I had been flirting with my soon-to-be-boyfriend at the convention all weekend. After that experience, I distanced myself from him and unfortunately Michele as well. I felt incredibly guilty even though I hadn't done anything wrong. I went to therapy and worked on forgiveness I chose to forgive him for what he had done. Maybe it was just me? Maybe it was a one-time thing never to be repeated again? You can imagine my devastation when I learned that I wasn't the only one. That it was happening to colleagues, and worse yet, convention attendees.

All the pictures and messages that are being passing around were taken at the press events and premiere for the Broly movie in mid-December. About 2 weeks after that, three of my close friends came forward. When these friends shared their stories with me, I was heartbroken. How could this happen to three of my close friends without me ever knowing? As more people came forward, I began to see the similarities. I chose to share my testimony with investigators solely because it corroborated the others' testimony. I didn't start this, I have nothing to gain from it, I didn't steal anyone's roles or titles; the stuff you're hearing on YouTube is all lies attempting to create drama and get subs/views. I'm perfectly content being *just* a voice actor.

The investigations were incredibly thorough. Each person was interviewed, the evidence weighed, and a decision made. Each company has to look out for the safety of their employees. In this instance, these companies felt they made the best decision to protect their employees and contract workers. Also, these companies aren't obligated to share any information with you. Many of the women who've come forward have chosen to remain anonymous, especially after seeing the way that I've been attacked. Please respect their privacy.

I didn't want to come forward on Twitter but I felt like I had to do something because my friends' lives, children, and careers were being threatened. Also, I knew if I didn't, there was a very good chance that this would just get swept under the rug... again.

I apologize for lashing out and threatening fans. I don't want to have to take people to court or send law enforcement after them but I was doing what I felt necessary to protect myself at the time. There is a watch list and I have the names and numbers of multiple harassers, but I'm willing to forgive if you'll stop the madness now. You may feel that my colleagues and I have been harsh, but let me ask you this: how would you respond if your life was being threatened? If the lives of your loved ones, your friends, your friends' children, were being threatened? If your addresses and phone numbers were being passed around like candy so people could call or drop by just to antagonize you? If the local authorities made sure to drive past your house daily, just to make sure you're okay? If you were forced to be on the phone with various law enforcement and lawyers every single day? If people were trying to get you fired just because you came forward with the truth? If you were doxxed because people think it's fun to attack those who are hurting?

I have always stood up for this community. I have loved the anime fandom from the moment I went to my first convention. To be threatened like this by the community I love, really hurts m heart. I recently stood up for the Dragon Ball fandom, only to have that community come back and attack me mercilessly. It has been so incredibly painful, I can't even express.

I have never said anything hurtful toward Vic or any of his fans. I don't want to ruin his life, he was/is my friend. I don't want him to be labeled a predator for life. I want him to get help and realize that his actions have hurt many people, including me. If he takes the necessary steps to better himself, then perhaps I would be willing to forgive him again.

I'm tired of the fighting, I'm tired of the threats, all of it. From here on, I will only be posting positivity and light. Any threats or retaliation will be met with an immediate block. I'm not wasting any more time on this matter. It's over. This has been incredibly difficult for everyone involved. Please be kind to one another. <3

Much love,
Monica

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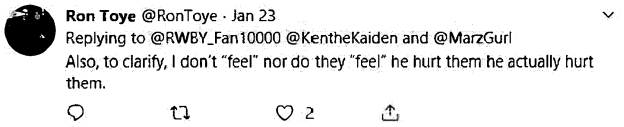

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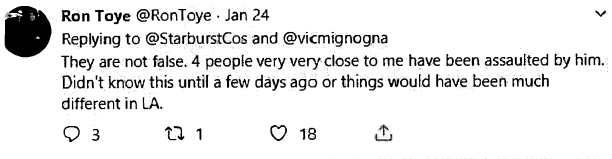

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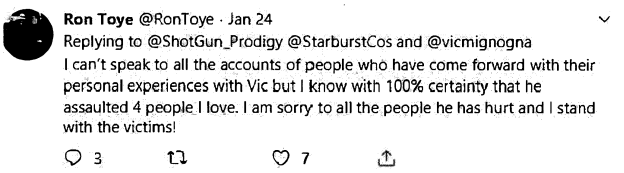


3

Copy from re:SearchTX

Ron Toye @RonToye · Jan 24

Replying to @soaker11 @KaggyFilms and @vicmignogna

I will call him awful and this isn't hearsay! There are three types of people in this world and I am the sheepdog! Quote from a great movie below for reference.

> And if it ever darkened their doorstep, they wouldn't know how to protect themselves. Those are the sheep.
> Then you've got predators, who use violence to prey on the weak. They're the wolves.
> And then there are those blessed with the gift of aggression, an overpowering need to protect the flock.
> These men are the rare breed who live to

1 · 9

4

Ron Toye @RonToye · Jan 25

Replying to @USO_Squad @NJ4K1 and 2 others

I am not anonymous, I know Vic, I know ladies very close to me who have the exact same experience with him that mirrors the experiences of 100's of the survivors coming forward. Some stay anonymous due to fear, understandably. If it walks like a duck, quacks like a duck it's a...

1 · 4

5

Ron Toye @RonToye · Jan 25

Replying to @RW8Y_Fan10000 @NJ4K1 and 2 others

Yes I do. Do you know who I am? Do you think I would make this up? He hurt my personal friends. He knows me personally. He knows who he hurt. Check yourself. You are backing the wrong guy in this one.

1 · 8

6

Ron Toye @RonToye · Jan 26

Replying to @shanealdo21 and @PenguPooh

That's not true, lol. You obviously don't know how sexual assault cases work. How many victims set up cameras just in case they get assaulted? There is consistency in each story shared for almost 20 years. It's called a pattern. He is guilty! You will see.

7

Ron Toye @RonToye · Jan 25

Replying to @iNCEPTIONALNEWS and @vicmignogna

They are not false, sorry to say. I have 4 people very close to me who had a very similar experience with Vic. He assaulted them and it's almost exactly the same as most of the stories you are reading online. It's a pattern he follows.

1 · 2

7

Copy from re:SearchTX

Ron Toye @RonToye · Jan 25

Replying to @MarKGrissom24 and @vicmignogna

He might have been nice to some but he was the personification of evil to others. To say the testimonies are ridiculous is ignorant. I could see if 1 person told a story, maybe doubt it, BUT the same story spanning almost 2 decades by multiple people. Come on man.

3 2

8

Ron Toye @RonToye · Jan 25

Replying to @CaMangaLibrary @RWBY_Fan10000 and @vicmignogna

Lol what facts? A statement? So, the statements people have made about their accounts with him, by that logic are facts, too. Look at what people say about most sociopaths. "They were charismatic, nice, helpful." It's a mask to lower guards.

2 2 19

9

Ron Toye @RonToye · Jan 26

Replying to @anton1822004 @CaMangaLibrary and 3 others

I have a bias because he harmed my friends. I don't care if anyone takes it seriously. The key for me is that Vic knows that I know and that I won't tolerate it one bit.

1 5

10

Ron Toye @RonToye · Jan 26

Replying to @StarburstCos and @vicmignogna

Yes it does lol there are hundreds of girls on here testifying to their experience are you blind? Vic's victims are testifying in the court of social media and people are calling them liars.This is why people don't come forward. You blindly trust this man despite all the evidence

4 4

11

Copy from re:SearchTX

Ron Toye @RonToye · Jan 26

Replying to @StarburstCos and @vicmignogna

I don't care if it holds anything in your opinion. What matters to me is supporting the survivors and Vic knowing he and I are due for a chat.

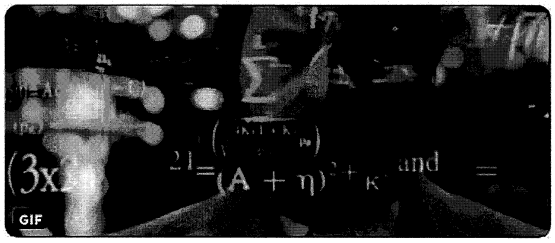
1 5

12

Ron Toye @RonToye · Jan 26

Replying to @RonToye @StarburstCos and @vicmignogna

I know you have to be able to add these clues up.15 years of the same story over and over. People posting their stories. Maybe just maybe there might be some truth to it and if there is you are backing a predator 🐯🐯🐯 does this sound familiar? Take your time I can wait.



1

13

Ron Toye @RonToye · Jan 26

Replying to @imfriendswithme

@VicMignogna you know the 4 ladies I am talking about. I can't speak for any of the other stories, even though they all sound the exact same as my 4 close very close friends. You are not escaping this one, buddy!

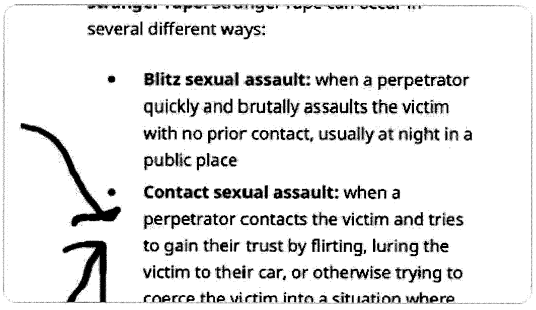
1 8

14

Ron Toye @RonToye · Jan 28

Replying to @StarburstCos and @vicmignogna

rainn.org/articles/sexua... maybe an elevator, or hotel room sound familiar? Check this site out to educate yourself on the subject. It's a sad day when a man has to defend ladies from a lady protecting a man with a clear history of deviancy.


several different ways:

- **Blitz sexual assault:** when a perpetrator quickly and brutally assaults the victim with no prior contact, usually at night in a public place
- **Contact sexual assault:** when a perpetrator contacts the victim and tries to gain their trust by flirting, luring the victim to their car, or otherwise trying to coerce the victim into a situation where

1 3

15

Copy from re:SearchTX

Ron Toye @RonToye · Jan 31

Replying to @SnowandRavens

I know him personally and I know of at least 4 assaults and I have witness some of the obnoxious behavior towards con staff. I am glad to see conventions cancelled and the truth coming to light.

2

16

Ron Toye @RonToye · Feb 1

Replying to @Micshork

He is guilty of at least 4 accounts that I know of personally.

6 2 31

17

Ron Toye @RonToye · Feb 2

Replying to @CanvasPirate and @Rialisms

Lol I know what baseless means. I guess you are missing the point. I am saying without question and 100% unequivocally there is a base to these claims. Not sure why you can't understand that. I did read the 5 links you posted. There is always a margin for error so what's yours?

18

Ron Toye @RonToye · Feb 2

Replying to @SmugVegito @ofsassgard and 3 others

That's probably why she is still Bulma, right? Since she is doing such a bad job? lol! Dismissed! How did Broly do in theaters? Horrible right?

3 3

19

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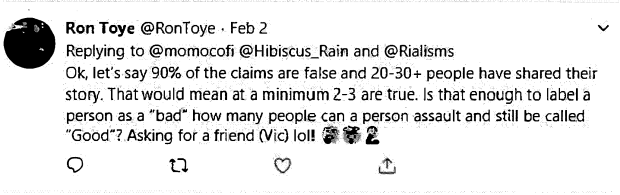

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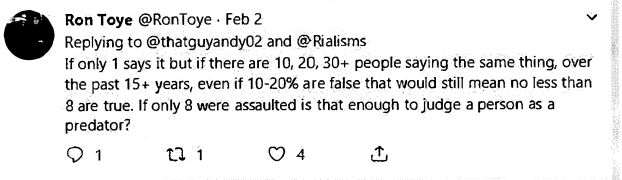

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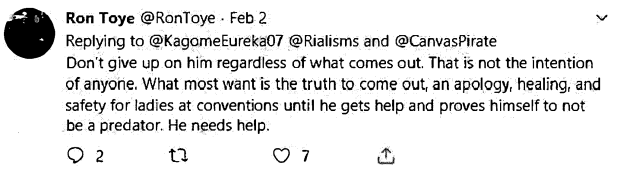

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Ron Toye @RonToye · Feb 2

Replying to @KagomeEureka07 @Rialisms and @CanvasPirate

I am sorry, we have personally knowledge of things he has done that are reprehensible. There are no two sides in this. I wish there was but unfortunately it is not the case.

1

24

Ron Toye @RonToye · Feb 2

Replying to @CanvasPirate and @Rialisms

Lol exactly so when it comes out he is a predator, this isn't my truth he wouldn't prey on me, this is the current truth of him as a subpar human, what will be your apology? Give me an example. I already know I am right so I don't have to apologize. Insider knowledge and all ;)

1

25

Ron Toye @RonToye · Feb 4

Replying to @McBenefit @MorphBox and 7 others

I better see him canceled from a few more of those or I won't be going back. ;) can't speak for anyone else but I won't go. ;)

3 10

26

Ron Toye @RonToye · Feb 4

Replying to @z31r4m @SlaveOfSuzumiya and 5 others

Lol! Like you understand law. Haha! Hilarious! Defending a predator and instructing people to study law. Tell me what it's called when 100+ people have a similar story spreading over a 15 year span. There is a legal term for this and I will wait for your response :)

1 3

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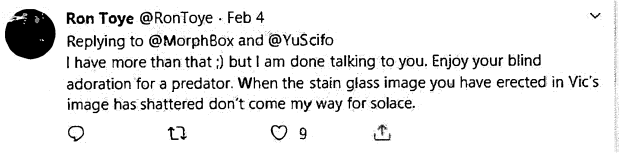

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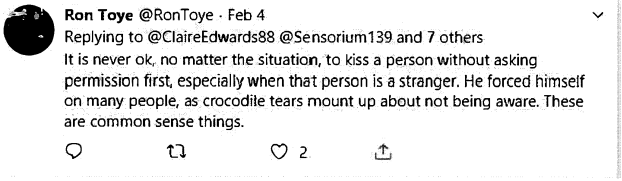

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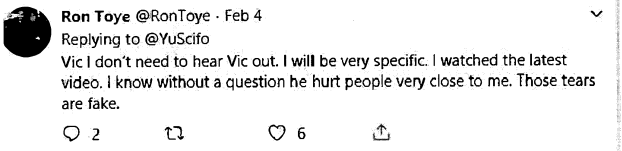

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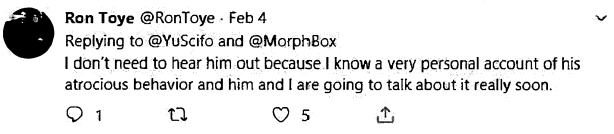

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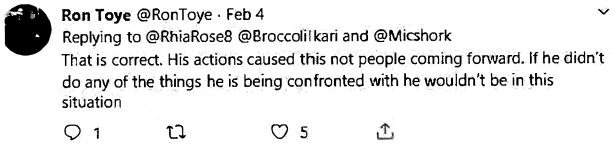

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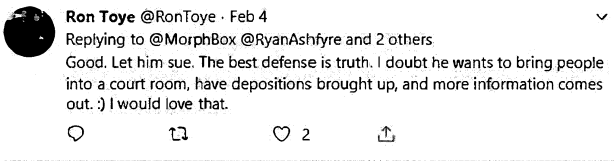

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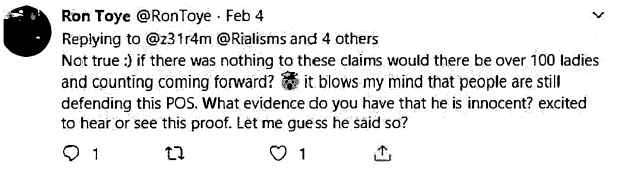

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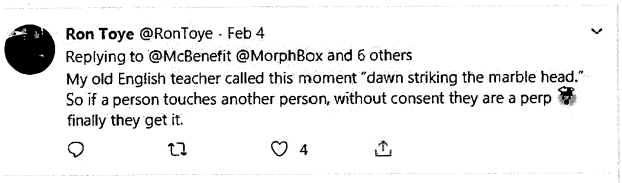

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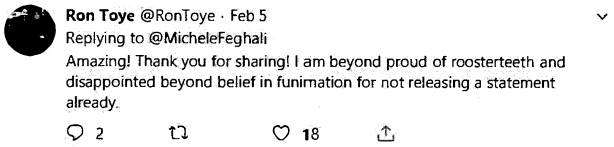

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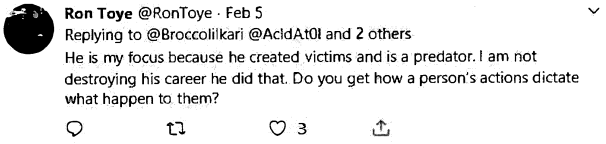

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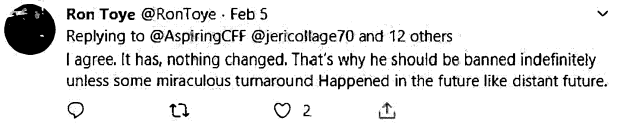

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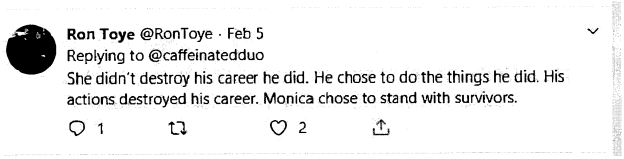
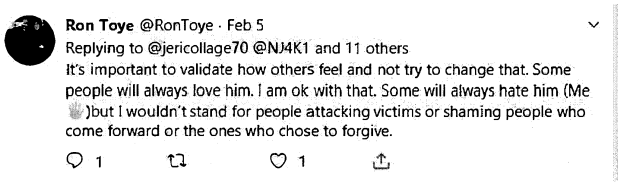


Ron Toye @RonToye · Feb 5
Replying to @caffeinatedduo
She didn't destroy his career he did. He chose to do the things he did. His actions destroyed his career. Monica chose to stand with survivors.
1 2

40



Ron Toye @RonToye · Feb 5
Replying to @jericollage70 @NJ4K1 and 11 others
It's important to validate how others feel and not try to change that. Some people will always love him. I am ok with that. Some will always hate him (Me)but I wouldn't stand for people attacking victims or shaming people who come forward or the ones who chose to forgive.
1 1

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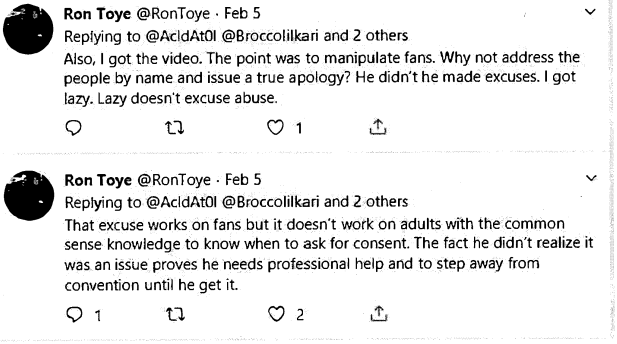

Ron Toye @RonToye · Feb 5
Replying to @AcIdAt0I @BroccoliIkari and 2 others
Also, I got the video. The point was to manipulate fans. Why not address the people by name and issue a true apology? He didn't he made excuses. I got lazy. Lazy doesn't excuse abuse.
1

Ron Toye @RonToye · Feb 5
Replying to @AcIdAt0I @BroccoliIkari and 2 others
That excuse works on fans but it doesn't work on adults with the common sense knowledge to know when to ask for consent. The fact he didn't realize it was an issue proves he needs professional help and to step away from convention until he get it.
1 2

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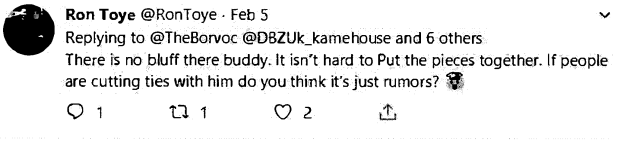

Ron Toye @RonToye · Feb 5
Replying to @TheBorvoc @DBZUk_kamehouse and 6 others
There is no bluff there buddy. It isn't hard to Put the pieces together. If people are cutting ties with him do you think it's just rumors?
1 1 2

43

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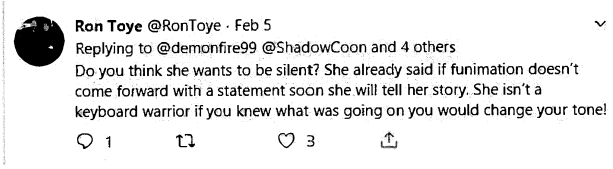


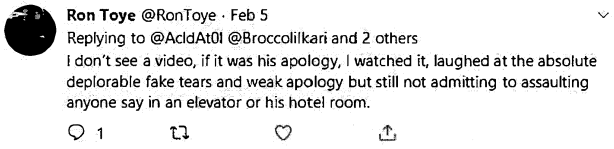
Ron Toye @RonToye · Feb 5

Replying to @demonfire99 @ShadowCoon and 4 others

Do you think she wants to be silent? She already said if funimation doesn't come forward with a statement soon she will tell her story. She isn't a keyboard warrior if you knew what was going on you would change your tone!

1 3

44



Ron Toye @RonToye · Feb 5

Replying to @AcIdAt0l @Broccolilkari and 2 others

I don't see a video, if it was his apology, I watched it, laughed at the absolute deplorable fake tears and weak apology but still not admitting to assaulting anyone say in an elevator or his hotel room.

1

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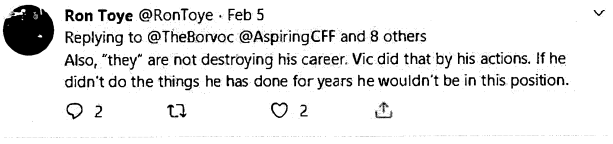


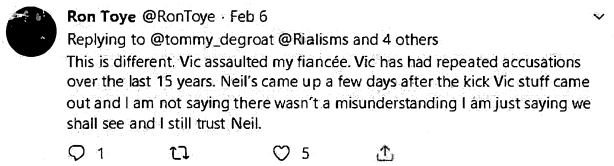
Ron Toye @RonToye · Feb 5

Replying to @TheBorvoc @AspiringCFF and 8 others

Also, "they" are not destroying his career. Vic did that by his actions. If he didn't do the things he has done for years he wouldn't be in this position.

2 2

46



Ron Toye @RonToye · Feb 6

Replying to @tommy_degroat @Rialisms and 4 others

This is different. Vic assaulted my fiancée. Vic has had repeated accusations over the last 15 years. Neil's came up a few days after the kick Vic stuff came out and I am not saying there wasn't a misunderstanding I am just saying we shall see and I still trust Neil.

1 5

47

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Ron Toye @RonToye · Feb 5

Replying to @RonToye @Broccolilkari and 3 others

Now, if he has committed additional things I am not privileged to, I can't speak to those, if he deserves a career. I can only speak to the things he has done to people I care about. What he did was wrong but not outside of the realm of redemption.

1 2

48

Ron Toye @RonToye · Feb 5

Replying to @Dharengo @OzyMadenka and 10 others

That is the exact reason he is in this position. You can't assume consent. This isn't really that difficult. Also would you agree that the situation would be different if you tried to hug a random 4 year old?

1 2

49

Ron Toye @RonToye · Feb 6

Replying to @an3_daniel @Bgbiskite and 4 others

They just increased it but see how the system protects rapists? A rapist can get away with his crime and if enough time passes not face repercussions.

1 1

50

Ron Toye @RonToye · Feb 6

Replying to @tommy_degroat @cazamtothemax and 5 others

What about all the articles showing he isn't and testimony from people who have known him longer than 20 seconds it took to get a photo and the autograph they paid for?

3

51

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Ron Toye @RonToye · Feb 6

Replying to @BasedNrd

All of the stories are lining up. Please get off that one case. He is a creep. Tell me about the Bill Cosby case. What are your thoughts there? How about the Harvey Weinstein case?

1 2

52

Ron Toye @RonToye · Feb 6

Replying to @lucescape101 @MarcoUrtiz and @Rialisms

Hey, would you mind counting in that video how many times he calls fans stupid? Also, would you mind counting how many times he says he was wrong and did bad things. He assumed consent and admits he hurt people. Those are his words.

2 4

53

Ron Toye @RonToye · Feb 6

Replying to @jacobsa14128449 and @Rialisms

Shut your mouth you insensitive idiot! Don't tell her how she needs to do anything. Defending a fucking slime bag and telling a lady who opened up about it that she needs to get it all out. Do you see how intrusive that is? God damn fool!

1

54

Ron Toye @RonToye · Feb 6

Replying to @justanotherlo15 @Universal_Sato and @Rialisms

I wouldn't doubt Vic would do something like that but how does this involve Monica?

55

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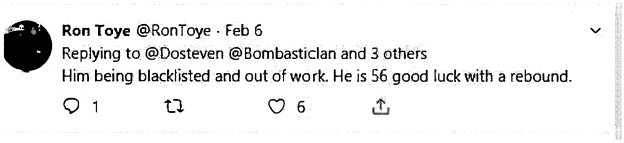

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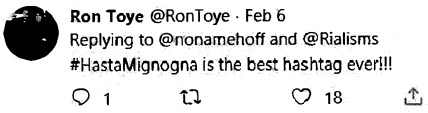

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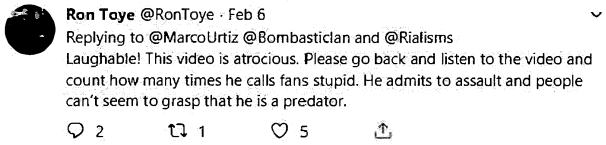

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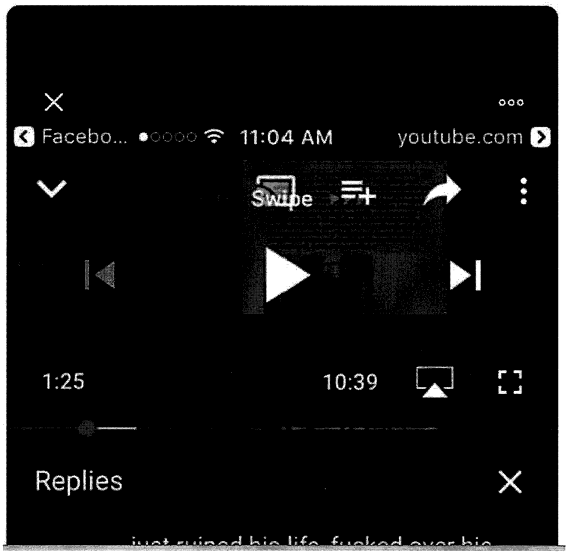
Ron Toye @RonToye · Feb 6
Replying to @Darkbunnyrabbit and @Rialisms
He assaulted her. She will tell her situation soon and the history of it all.
1 2

60

Ron Toye
@RonToye
Replying to @TheJoker_TWV and @Fermit_
That's correct. And these are his supporters. He assaulted my fiancée. Forced himself on 4 of my friends. Not just awkward hugs. This is why victims stay silent. People who have met him for amount willing to put threats that are going to get them arrested.



61

Ron Toye @RonToye · Feb 6
Replying to @NobleQn1995 @VoiceOfVegeta and 2 others
This is a lame video. Do you realize how many times he calls his fans dumb in this video? At least 3. he admits to being inappropriate and not asking consent. We are talking a 2 minutes in. He repeats himself. 8.31 minutes that he did things he should have asked first. #kickVic
1 14

62

Ron Toye @RonToye · Feb 6
Replying to @Dosteven @Bombasticlan and 3 others
Not for what he did to my fiancée or 3 other friends who have a very similar story. He needs to face the consequences of his actions yes jail no. What I want is him to face me!
1 5

63

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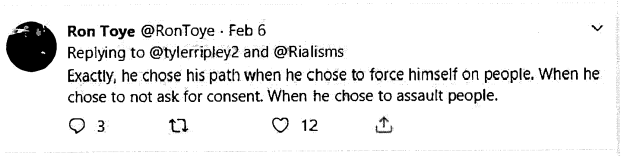

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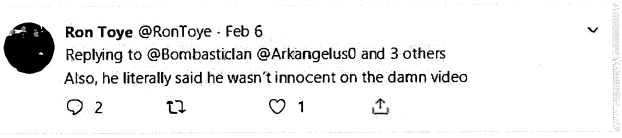

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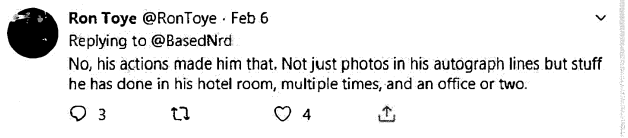

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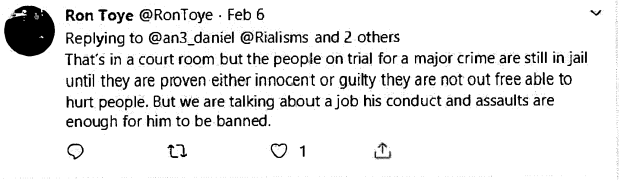

Ron Toye @RonToye · Feb 6

Replying to @an3_daniel @Rialisms and 2 others

That's in a court room but the people on trial for a major crime are still in jail until they are proven either innocent or guilty they are not out free able to hurt people. But we are talking about a job his conduct and assaults are enough for him to be banned.

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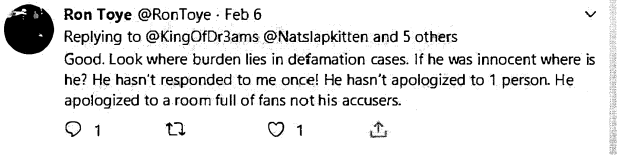

Ron Toye @RonToye · Feb 6

Replying to @KingOfDr3ams @Natslapkitten and 5 others

Good. Look where burden lies in defamation cases. If he was innocent where is he? He hasn't responded to me once! He hasn't apologized to 1 person. He apologized to a room full of fans not his accusers.

1 1

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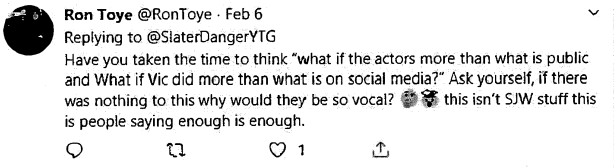

Ron Toye @RonToye · Feb 6

Replying to @SlaterDangerYTG

Have you taken the time to think "what if the actors more than what is public and What if Vic did more than what is on social media?" Ask yourself, if there was nothing to this why would they be so vocal? this isn't SJW stuff this is people saying enough is enough.

1

70

Ron Toye @RonToye · Feb 6

Yup. This is the classic move that trolls do and make it hard for real victims to speak out. Are you mad your precious frosted tipped Jesus isn't as pure as the driven snow :(

1 2

71

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Ron Toye @RonToye · Feb 6

Replying to @tylerripley2 and @Rialisms

I excuse you but excuse me for being pissed off that my fiancée was assaulted and then shamed for coming forward and then demanded to show proof. 100+ ladies coming forward is proof. His own words from his latest apology is proof.

1 3

72

Ron Toye @RonToye · Feb 6

Replying to @tommy_degroat @Rialisms and 4 others

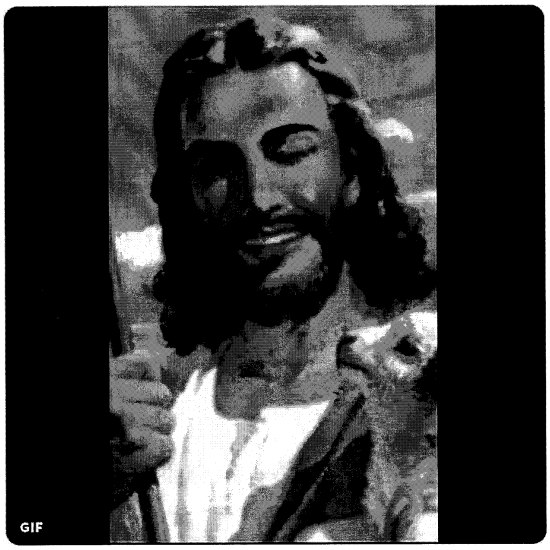
Neil is a great dude. I am sure he will get this concern addressed. It is a dichotomy to stand with survivors but also with friends. The great news is this is the first claim against him and only a day after he posted a video of Vic mounting him.

2 2

73

Ron Toye @RonToye · Feb 6

Replying to @marchimark



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74

Ron Toye @RonToye · Feb 6

Replying to @Darkbunnyrabbit and @Rialisms

You are a fucking idiot. Proof will be him getting fired from everything. Cry me a river you disgust me. Tell mom right now that you think a woman who was assaulted must show you evidence let me know how that goes.

2 4

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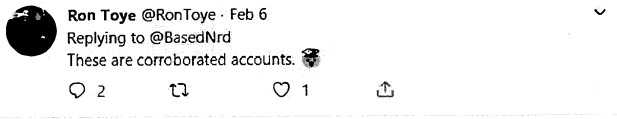

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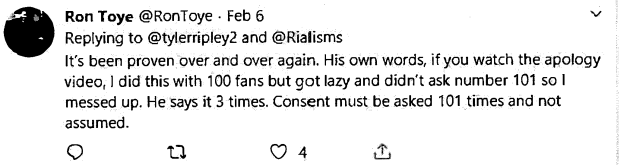

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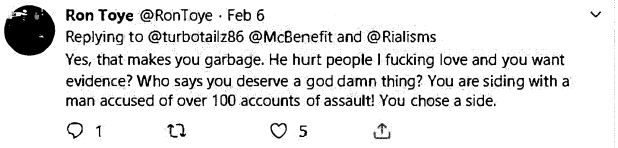

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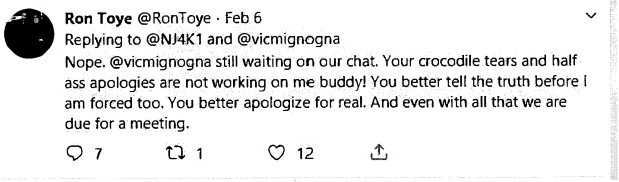
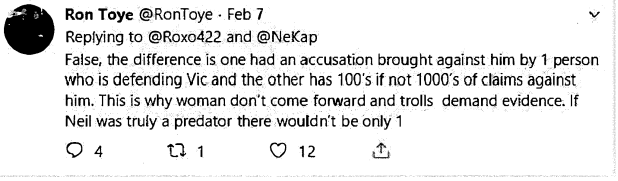


80



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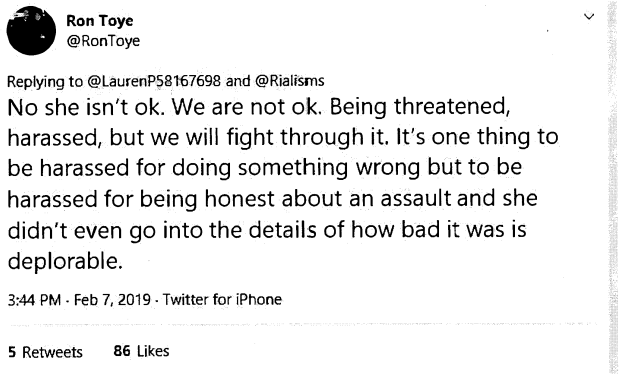


82

83

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Void4Zero @McBenefit and 2 others

Hey @FUNimation do you see the garbage you have allowed by being silent? People attacking my fiancée. You should be the utmost ashamed of how you handled this.

10:18 AM · Feb 7, 2019 · Twitter for iPhone

84

Ron Toye @RonToye · Feb 7

Replying to @NeversonDelvin and @Rialisms

How dare you say you are disappointed in her? Go ask your real mom how you should react when a lady makes herself vulnerable and admits an assault and you shame her. Let me know what she thinks.

1 2

85

Ron Toye
@RonToye

Replying to @Demonsword666 and @FUNimation

He isn't he assaulted Monica and before you even ask for evidence go ask your mother if that's appropriate to ask a victim of assault.

7:46 PM · Feb 7, 2019 · Twitter for iPhone

2 Retweets 32 Likes

86

Ron Toye
@RonToye

Replying to @garro_mark @NWC_Nation and 6 others

Let the light shine. This man assaulted my fiancée. Assaulted many of my female friends. Any threats are taken seriously and I am ready to press charges.

7:43 PM · Feb 7, 2019 · Twitter for iPhone

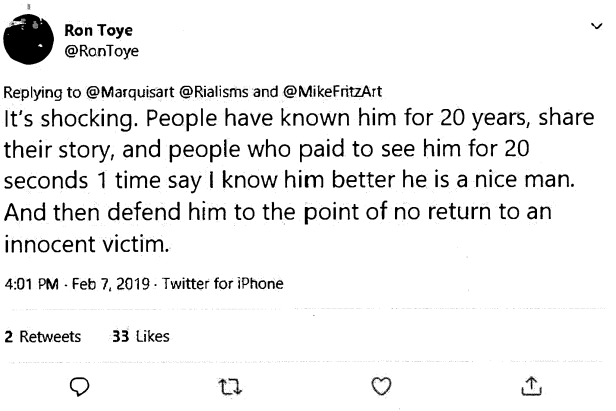
2 Likes

87

Copy from re:SearchTX

88

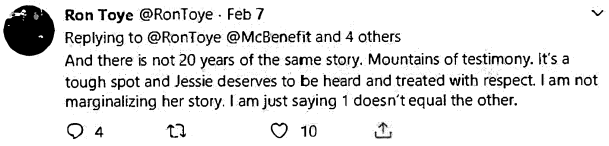
89



90

91

Copy from re:SearchTX



92

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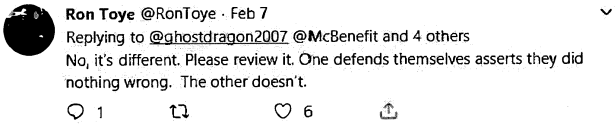


94

95

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @crazylemur

Most people can duduce that this was a scam and fake on their own. It's a sad attempt under the direction of @vicmignogna to defend him from detractors. The sad thing is he brought kids to an adult fight.

3:28 PM · Feb 7, 2019 · Twitter for iPhone

96

Ron Toye
@RonToye

Replying to @crawfordgraham2 and @Rialisms

The organization who failed to act on the claims filed against Vic are at fault. The people spoke out but since no police reports were filed the excuse was nothing could be done. So I agree the company who knew the most for a few years and ignored it is to blame.

7:26 PM · Feb 7, 2019 · Twitter for iPhone

6 Likes

97

Ron Toye
@RonToye

They should have fired him a long time ago when the first few complaints were filed against him. They failed to protect their employees

7:31 PM · Feb 7, 2019 · Twitter for iPhone

12 Likes

Unlimited Love Works @davidgraham221 · Feb 7
Replying to @RonToye and @FUNimation
But, weren't a good portion of the allegations proven to be fake?

98

Ron Toye
@RonToye

Replying to @MarcoUrtiz @garro_mark and 8 others

Also they have proof. That's why they fired him

7:52 PM · Feb 7, 2019 · Twitter for iPhone

2 Retweets **7** Likes

99

Copy from re:SearchTX

Ron Toye
@RonToye

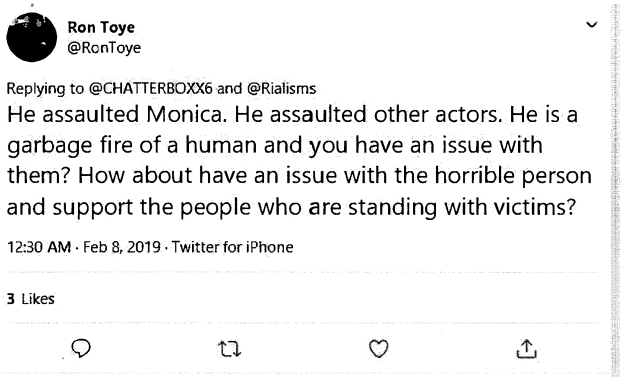
Replying to @davidgraham221 and @FUNimation

They should have fired @vicmignogna a long time ago. Sucks that report after report fell on def ears and saying no police report was filed so their hands are tied is a sack it bs.

7:33 PM · Feb 7, 2019 · Twitter for iPhone

3 Likes

100



Ron Toye
@RonToye

Replying to @CHATTERBOXX6 and @Rialisms

He assaulted Monica. He assaulted other actors. He is a garbage fire of a human and you have an issue with them? How about have an issue with the horrible person and support the people who are standing with victims?

12:30 AM · Feb 8, 2019 · Twitter for iPhone

3 Likes

101

Ron Toye
@RonToye

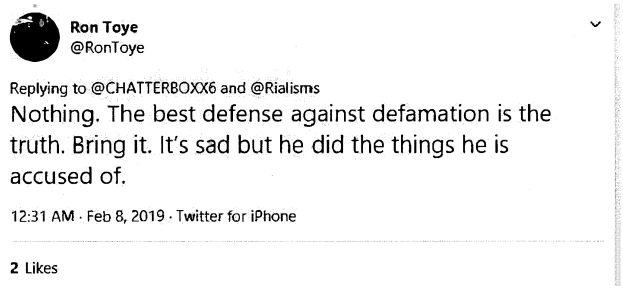
Replying to @Whitewolf196 and @Rialisms

He is going to get his too @vicmignogna that is. He incited this

12:29 AM · Feb 8, 2019 · Twitter for iPhone

2 Likes

102



Ron Toye
@RonToye

Replying to @CHATTERBOXX6 and @Rialisms

Nothing. The best defense against defamation is the truth. Bring it. It's sad but he did the things he is accused of.

12:31 AM · Feb 8, 2019 · Twitter for iPhone

2 Likes

103

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @MichellMcC73 @Rialisms and 2 others

Wow! It's keeps getting worse and worse. :(we have been getting death threats and harassing calls when will people see he isn't the saint they make him out to be.

11:16 AM · Feb 8, 2019 · Twitter for iPhone

12 Retweets **66** Likes

104

Ron Toye
@RonToye

Replying to @CHATTERBOXX6 and @Rialisms

"Hey assaulter, please wait a second so I can whip out my camera and record this because when I come forward moronic people are going to ask for proof" that's not how this works.

8:17 AM · Feb 8, 2019 · Twitter for iPhone

8 Likes

105

Ron Toye
@RonToye

Replying to @AdjoryT @tenkosthighs and 2 others

Exactly. She gave him chance after chance, she thought her drastic experience was isolated but when she found out the exact them happened to a few of our there friends she knew that she had to speak up.

11:59 AM · Feb 8, 2019 · Twitter for iPhone

7 Likes

106

Ron Toye
@RonToye

Replying to @an3_daniel @SlaveOfSuzumiya and 8 others

It's more than that. Vic assaulted Monica and it wasn't a hug or kiss on the cheek.

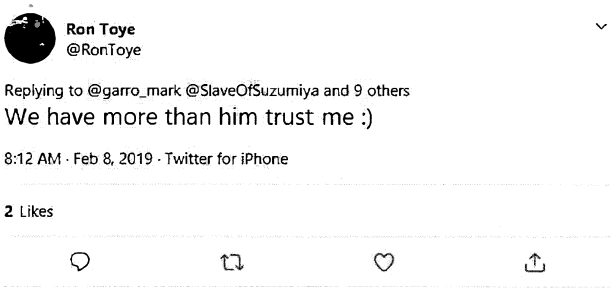
8:24 AM · Feb 8, 2019 · Twitter for iPhone

7 Likes

107

Copy from re:SearchTX

108



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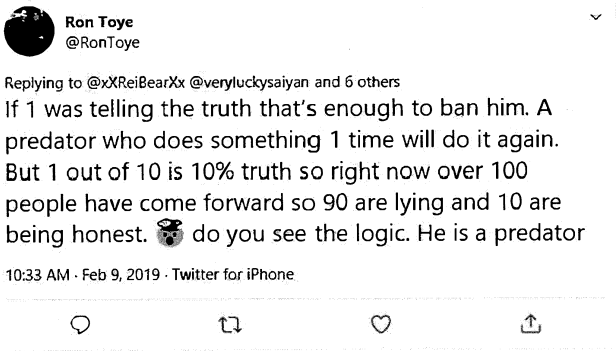

110

111

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @veryluckysaiyan @purblebirb and 3 others

How convenient? Yes, that's what predators do, they go after multiple people. There are countless other actors who have been assaulted by him. Do you think they enjoy coming forward? Enjoy the harassment from people?

10:00 AM · Feb 9, 2019 · Twitter for iPhone

112

Ron Toye
@RonToye

Replying to @SlaterDangerYTG @secretvisions and 3 others

Have you met Vic in person? Do you work at funimation? How do you know if they didn't let people know about his behavior? Oh wait you don't ;) continue keyboard ninja and defend the predator while we know the truth :)

10:16 AM · Feb 9, 2019 · Twitter for iPhone

1 Retweet **13** Likes

113

Ron Toye
@RonToye

Replying to @ZachAttachCarte @xXReiBearXx and 3 others

We, I know I have, along with my Fiancée, her friends and countless other actors. People defending him who met him for 10 seconds after PAYING him are amazed that he was nice. It was his JOB. That doesn't excuse his predator behavior

9:58 AM · Feb 9, 2019 · Twitter for iPhone

1 Like

114

Ron Toye
@RonToye

Replying to @DLBot2016 @inatodoseiji and 3 others

He isn't even close to their biggest money maker but they are cowards for not making a statement yet and blaming it on Sony.

9:48 AM · Feb 9, 2019 · Twitter for iPhone

2 Likes

115

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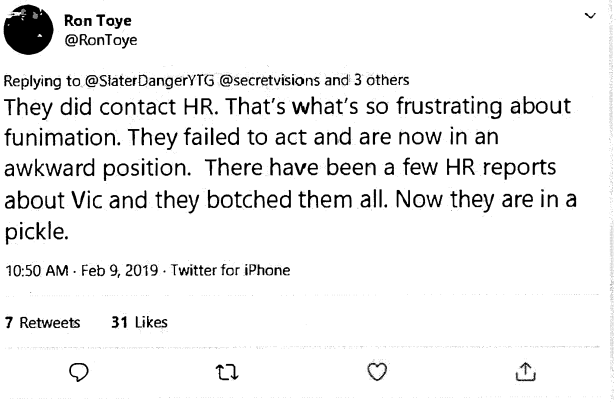

116

117

118

119

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @someknowmeas @Bgbiskite and 10 others

That's obviously not true. If he was innocent why would he be fired? This is more than the photos in his autograph line but think if he was willing to do that when everyone was watching what is he willing to do when no one is? Those are the reasons for him getting fired.

9:37 AM · Feb 9, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @jamesthomas205 and @Rialisms

If we are lying he should sue. We would love to go to court, In a defamation case the person filing the suit has to prove she lied the best defense against defamation the truth. There is a reason there has been any defamation cases brought against people? :)

9:42 AM · Feb 9, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @veryluckysaiyan @MarcoUrtiz and 6 others

So, are you saying, if your mom told you someone assaulted her, you would call her a liar? Demand physical evidence, or that you would believe her? I am engaged to Monica and I know she isn't a liar. I know what's going on behind the scenes and I assure you it's true.

10:31 AM · Feb 9, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @veryluckysaiyan @xXReiBearXx and 5 others

Bring it. Let him try to sue. There is a reason he isn't :) it's called the truth. He wouldn't want the actors who he has assaulted to come forward in court or his ex to come forward. Most want a safe work environment including at cons but if needed legal action is there.

9:55 AM · Feb 9, 2019 · Twitter for iPhone

5 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Lone_Walker47 @lancereaper74 and @Rialisms

Studios did internal investigations and that's why he is getting fired. Don't pretend to know anything. I can't speak on the firing of the guy from Guardians, but in Vic I know that's the case.

9:50 AM · Feb 9, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @RonToye @YTPJ_Henry and 8 others

And with most assault cases there isn't physical evidence but only the evidence that comes with a testimony and a testimony is in fact evidence.

10:53 AM · Feb 9, 2019 · Twitter for iPhone

4 Likes

Ron Toye
@RonToye

Replying to @ChakraMotive @Milkmanjapan11 and 3 others

🤬 makes them worse than the person committing the actual acts? Did you think about that all the way through? Also, you assume to know things that you obviously have zero clue about. News flash they did tell people and it fell on deaf ears.

9:35 AM · Feb 9, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @UchihaBorn53996

Vic in his video admits he didn't ask consent. Do you know what that means? He admits he is guilty. 🤬 those are just the acts he was caught on camera doing. He is getting fired due to the acts he committed when no one was looking.

10:20 AM · Feb 9, 2019 · Twitter for iPhone

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @YTPJ_Henry @veryluckysaiyan and 6 others

Bring it. We would love to take any lie detector test available. :) use logic, what does anyone stand to gain by lying other than Vic? oh yeah nothing. Vic is trying to save a career that he built on sand. He thought he could get away with hurting people and now time is up.

10:22 AM · Feb 9, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @CODO912

Me too. I can't wait to see what he has to say for himself :) the guy is a creep and assaulted her and countless others.

10:10 AM · Feb 9, 2019 · Twitter for iPhone

3 Retweets 21 Likes

Ron Toye
@RonToye

Replying to @PandaPaws455 @NicoNicotiiiine and 4 others

Still assault. He said he was wrong. Unwanted hugs and kisses are assault.

11:05 AM · Feb 9, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @UchihaBorn53996

Explain. How is her argument flawed? He sexually assaulted her, her friends, and countless fans. So please explain how her argument is flawed? Have you even met Vic in person? Without paying for an autograph?

10:14 AM · Feb 9, 2019 · Twitter for iPhone

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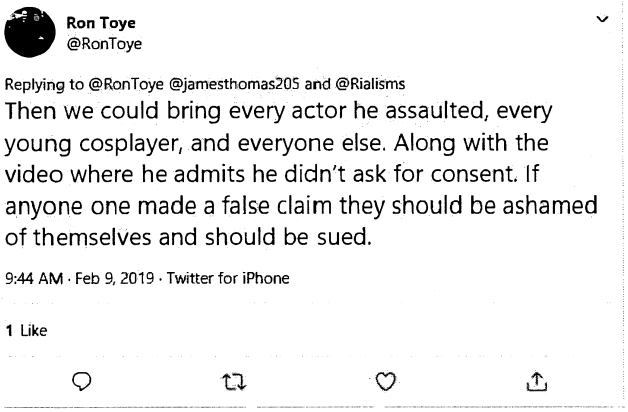
132



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134

135

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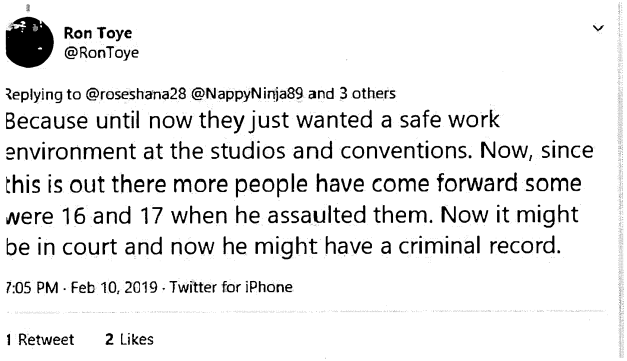

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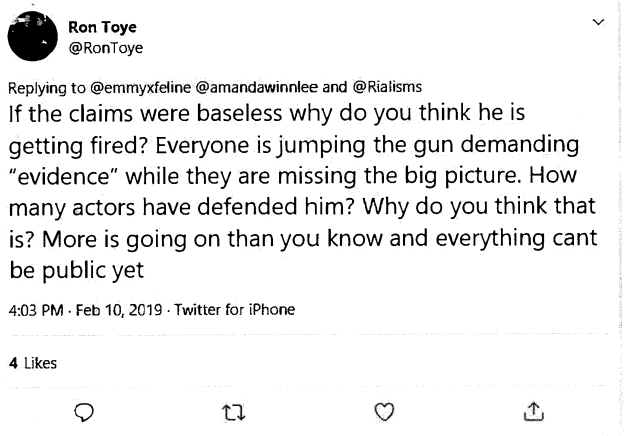

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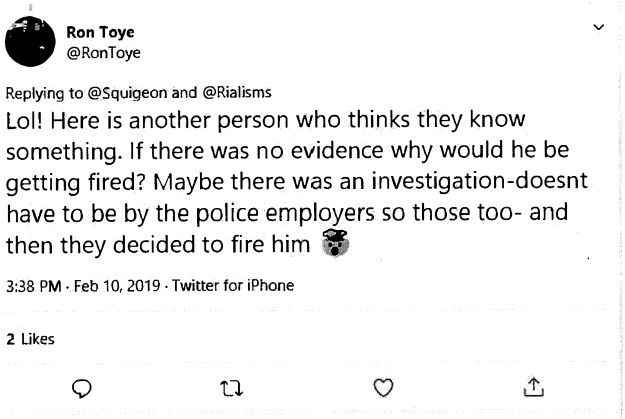

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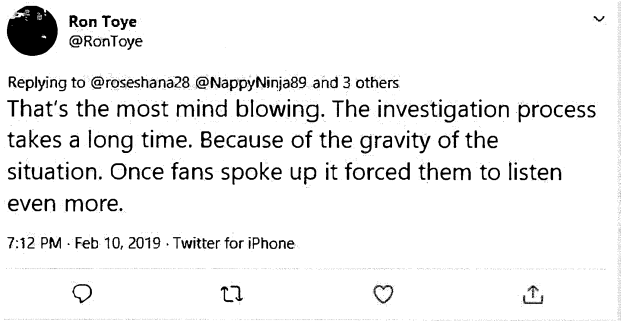

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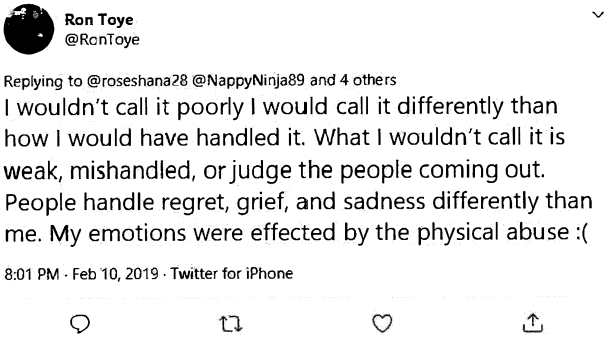


142

143

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Mefour0 @notquabat and 4 others

You are entitled to your opinion and I won't try to change that. If we lied Vic has every right to go after us just like we will to those who lied. But, sine we didn't he won't but I encourage him to go after those who were trying to photoshop evidence.

9:30 AM · Feb 10, 2019 · Twitter for iPhone

3 Likes

144

Ron Toye
@RonToye

Replying to @CptCrazyManiac and @Rialisms

She doesn't owe it to fans she and others have it to their employers and con owners. Think, why is he getting fired. Maybe it's because there is Evidence! Not everything can be posted publicly but what can will be.

3:34 PM · Feb 10, 2019 · Twitter for iPhone

2 Likes

145

Ron Toye
@RonToye

A powerful testimony from 30 years ago. This is a pattern people. And no human should have to feel like this.

> **Michelle** @MichellMcC73
> It's making me crazy how folks assume allegations against #vicmignogna are made up or blown out of proportion, due to his affectionate upbringing. Nah, y'all. I knew him before he was famous, and I AM at liberty to share my story, so why the hell not. Maybe it'll help someone.
> Show this thread

7:22 PM · Feb 10, 2019 · Twitter for iPhone

18 Retweets **196** Likes

146

Ron Toye
@RonToye

Replying to @RZeliox @Mefour0 and 2 others

You don't know the entire story or when things were brought to employers attention. This is very serious and deserves respect.

9:16 AM · Feb 10, 2019 · Twitter for iPhone

1 Like

147

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @roseshana28 @NappyNinja89 and 3 others

What it was is a stand. Taking a stand regardless of the threats because it was time to not let intimidation sweep this under a rug. Too many girls have been hurt.

7:17 PM · Feb 10, 2019 · Twitter for iPhone

1 Like

148

Ron Toye
@RonToye

Replying to @Josh_WyldeJames and @SeanSchemmel

Let's play with that scenario- what if you worked for a company and you told your touch my butthole story to HR, they investigated, talked with other employees, found additional claims that back up yours, and they fired him, would you be ok with that?

3:22 PM · Feb 18, 2019 · Twitter for iPhone

9 Likes

149

Ron Toye
@RonToye

Replying to @LaurenP58167698

It's going to be ok. Most of the people on there are hurting. It's hard to see an idol fall and he didn't help by asking his fans to go after his detractors.

8:48 PM · Feb 10, 2019 · Twitter for iPhone

6 Likes

150

Ron Toye
@RonToye

Replying to @Mefour0 @Rialisms and @TNBCfan93

I know. It's not helping his situation but he did ask them in the beginning to go after his detractors. But we have to make a stand to make sure true survivors are protected and false prosecuted on both sides of the argument

9:06 AM · Feb 10, 2019 · Twitter for iPhone

1 Like

151

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @SMuryai and @Rialisms

Sure, I know him through Monica. She has known him for 20 years. I know almost every voice actor relevant to this situation. I am engaged to Monica :) fact: he assaulted my fiancée.

5:54 PM · Feb 10, 2019 · Twitter for iPhone

1 Like

152

Ron Toye
@RonToye

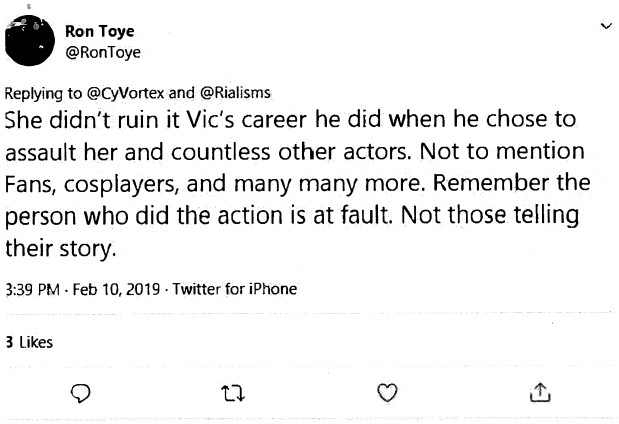
Replying to @SMuryai and @Rialisms

You should be ashamed to talk to a lady like that. I wonder what your mom would say? Tell me, how well do you know Vic? Have you been an actual friend? Why do you think zero people from the acting community have come forward to defend him? He is GUILTY!

3:36 PM · Feb 10, 2019 · Twitter for iPhone

2 Likes

153



Ron Toye
@RonToye

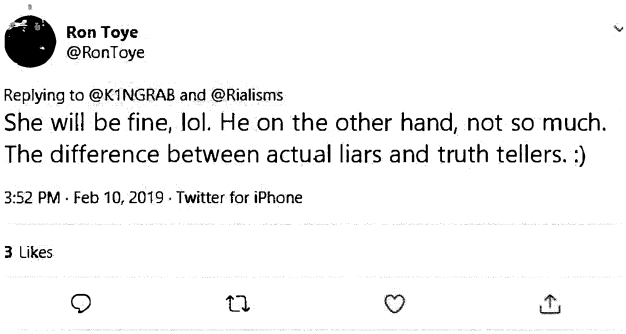
Replying to @CyVortex and @Rialisms

She didn't ruin it Vic's career he did when he chose to assault her and countless other actors. Not to mention Fans, cosplayers, and many many more. Remember the person who did the action is at fault. Not those telling their story.

3:39 PM · Feb 10, 2019 · Twitter for iPhone

3 Likes

154



Ron Toye
@RonToye

Replying to @K1NGRAB and @Rialisms

She will be fine, lol. He on the other hand, not so much. The difference between actual liars and truth tellers. :)

3:52 PM · Feb 10, 2019 · Twitter for iPhone

3 Likes

155

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @roseshana28 @NappyNinja89 and 3 others

Not always. The cops ask for evidence too. Testimony is evidence but usually they want more. If there is little physical evidence and the person doesn't have any history, on paper, or assault they might not pursue the case. But what we have is corroborative accounts over 30 yrs

7:48 PM · Feb 10, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @finnschan

But that doesn't mean that there are not consequences to what a person posts. Adults understand that. Monica does too when she came forward. That's why we take false accusations seriously.

9:36 AM · Feb 10, 2019 · Twitter for iPhone

Ron Toye
@RonToye

Replying to @Nikki95liner @Amberkmax02 and 2 others

It's weird how when you learn more about a person you start to not like them more. Information like, accounts of sexual assault she mentioned they were friends thought the incident was a 1 time thing tried to forgive and then 100's come forward, friends too. Same with opinions

11:03 PM · Feb 11, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @TennesseeWaster and @Rialisms

You have no idea what you are talking about. The claims against Vic are bigger than the photos he took with fans. Don't be so ignorant. It makes you look bad.

5:00 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Skampyy @JayExThree and 3 others

No L there. It's probable hard for you to see that there is a thing called promotion and maybe there are more people involved in the movie than 🤡 you know guy are standing with a man accused of assault all while talking shit to one of his survivors right?

7:46 AM · Feb 11, 2019 · Twitter for iPhone

3 Likes

160

Ron Toye
@RonToye

Replying to @LaurenP58167698

It's ok. This helps. Sad a once friend destroyed everything even after she forgave him of assault. Then she finds out he hurt so many of our friends, she validates their story with hers, and then people are confused as to why this hurts her so much.

11:18 PM · Feb 11, 2019 · Twitter for iPhone

2 Likes

161

Ron Toye
@RonToye

Replying to @FUNimation

❤️❤️❤️

4:46 PM · Feb 11, 2019 · Twitter for iPhone

2 Retweets **137** Likes

162

Ron Toye
@RonToye

Replying to @UltraDBZfan @Amberkmax02 and @vicmignogna

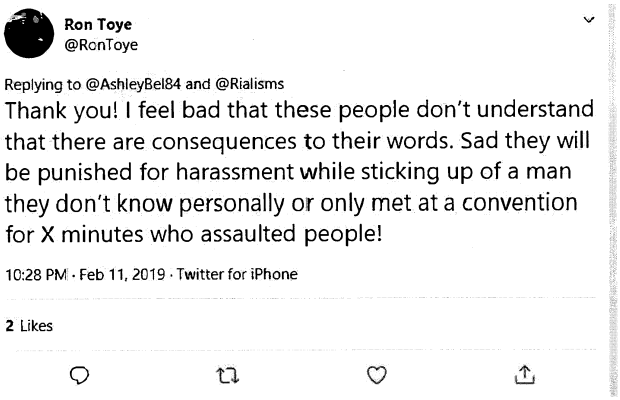
That's what happens when you find out your friend assaulted your other friends in almost the exact same way they assaulted you years earlier. And not just 1 friend but 10+ personal friends and the number grows daily.

11:05 PM · Feb 11, 2019 · Twitter for iPhone

1 Retweet **3** Likes

163

Copy from re:SearchTX



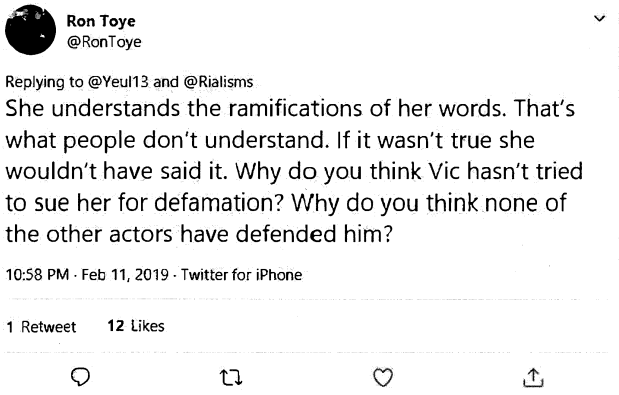
Ron Toye
@RonToye

Replying to @AshleyBel84 and @Rialisms

Thank you! I feel bad that these people don't understand that there are consequences to their words. Sad they will be punished for harassment while sticking up of a man they don't know personally or only met at a convention for X minutes who assaulted people!

10:28 PM · Feb 11, 2019 · Twitter for iPhone

2 Likes



Ron Toye
@RonToye

Replying to @Yeul13 and @Rialisms

She understands the ramifications of her words. That's what people don't understand. If it wasn't true she wouldn't have said it. Why do you think Vic hasn't tried to sue her for defamation? Why do you think none of the other actors have defended him?

10:58 PM · Feb 11, 2019 · Twitter for iPhone

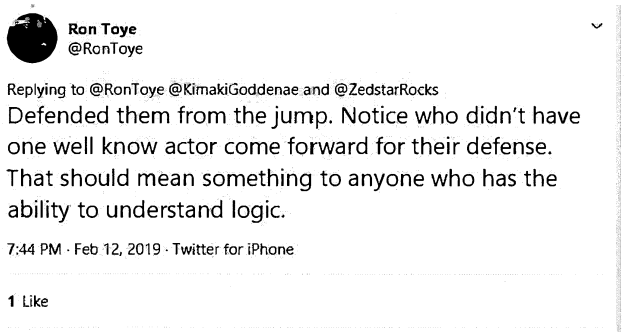
1 Retweet **12** Likes

Ron Toye @RonToye · Feb 12

Replying to @LaurenP58167698 @Rialisms and @marchimark

Don't do it. Silence them with kindness. Try not to engage with them. :) my plan is to stop, tomorrow. :) I won't be commenting on anything negative or about Vic unless it's nice or understanding.

2 1 2



Ron Toye
@RonToye

Replying to @RonToye @KimakiGoddenae and @ZedstarRocks

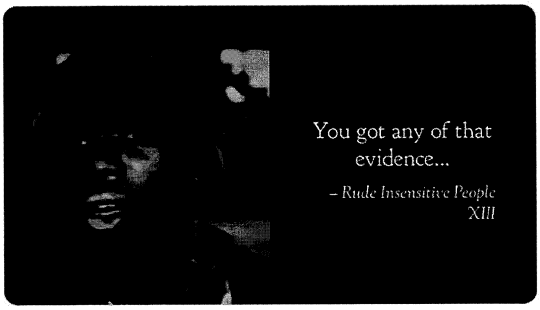
Defended them from the jump. Notice who didn't have one well know actor come forward for their defense. That should mean something to anyone who has the ability to understand logic.

7:44 PM · Feb 12, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye @RonToye · Feb 12
Replying to @McBenefit @MigueIItUp247 and @_Hero_Hei_



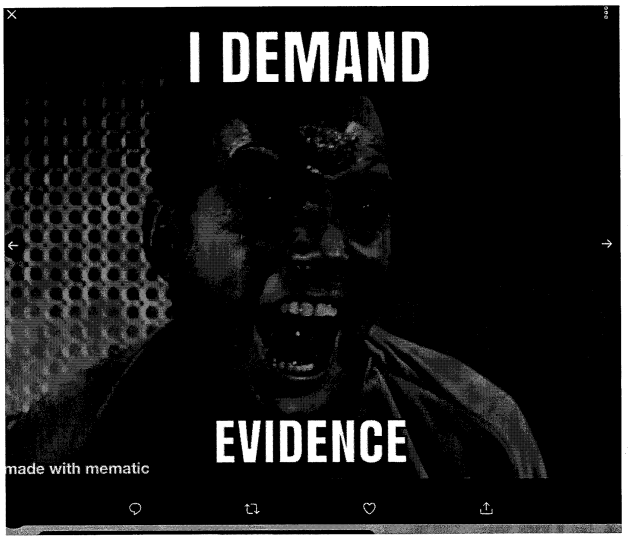
11

168

Ron Toye @RonToye · Feb 12
Replying to @RonToye @KimakiGoddenae and @ZedstarRocks
But doesn't make it easier for the fans who are hurting, on both sides. I feel horrible his fans are hurting. I feel horrible Monica's fans are hurting. He is done, now let's work on healing and stop the harassment. It isn't the answer most want but it's the best I can give.

1 2

169

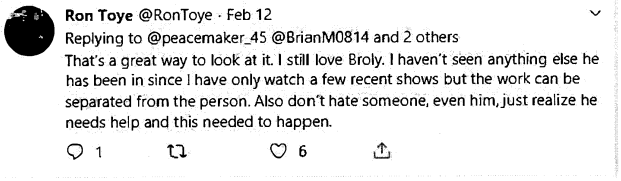


170

Ron Toye @RonToye · Feb 12
Replying to @LaurenP58167698
I made a few memes today :)

171

Copy from re:SearchTX



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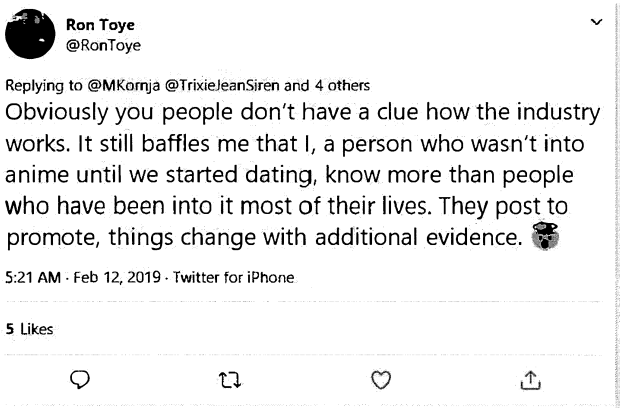

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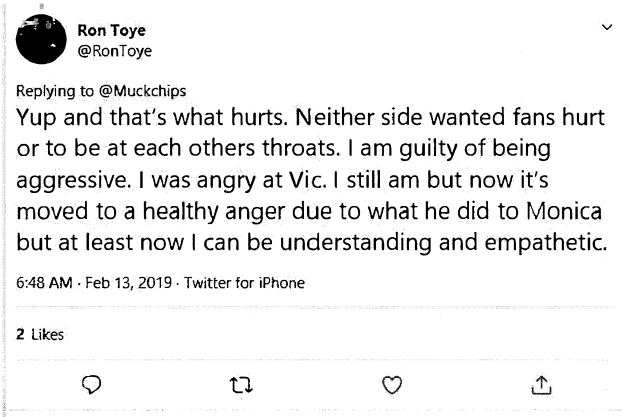
174



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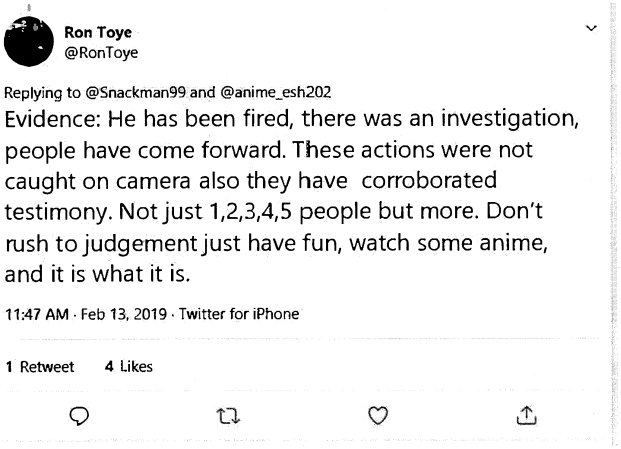


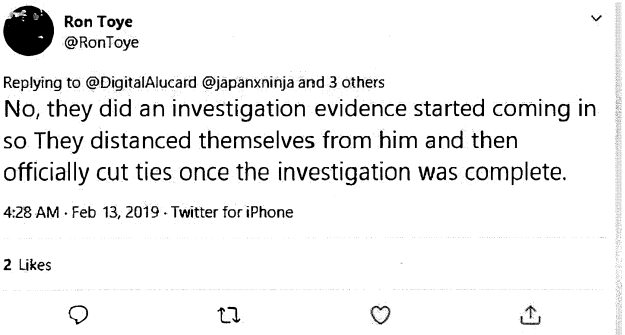
Ron Toye
@RonToye

Replying to @Snackman99 and @anime_esh202

Evidence: He has been fired, there was an investigation, people have come forward. These actions were not caught on camera also they have corroborated testimony. Not just 1,2,3,4,5 people but more. Don't rush to judgement just have fun, watch some anime, and it is what it is.

11:47 AM · Feb 13, 2019 · Twitter for iPhone

1 Retweet 4 Likes



Ron Toye
@RonToye

Replying to @DigitalAlucard @japanxninja and 3 others

No, they did an investigation evidence started coming in so They distanced themselves from him and then officially cut ties once the investigation was complete.

4:28 AM · Feb 13, 2019 · Twitter for iPhone

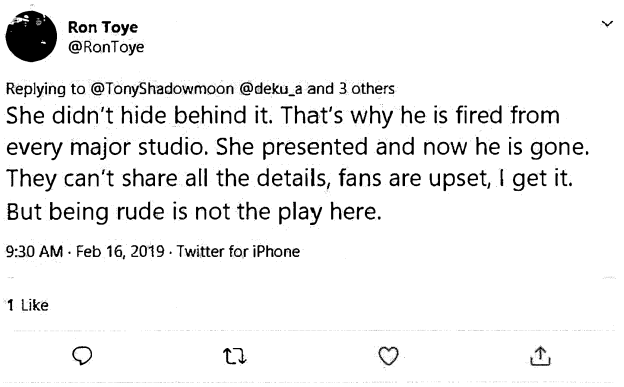
2 Likes

Ron Toye
@RonToye

Replying to @RonToye @BarrenWolfsbane and 3 others

I don't know any of the people with accounts of the photos personally so I will stay out of that. I don't know any of the fans that were kissed without consent. I only know Monica and our friends who he assaulted. I only address what I know personally

4:16 AM · Feb 13, 2019 · Twitter for iPhone



Ron Toye
@RonToye

Replying to @TonyShadowmoon @deku_a and 3 others

She didn't hide behind it. That's why he is fired from every major studio. She presented and now he is gone. They can't share all the details, fans are upset, I get it. But being rude is not the play here.

9:30 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @DigitalAlucard @DLBot2016 and 4 others

If somehow he could prove he didn't assault my fiancée, my other two friends, a few other voice actresses I know, and 2 additional friends I would personally apologize to his face and ask that he forgive me but I know the truth. I am living in the middle of it.

4:30 AM · Feb 13, 2019 · Twitter for iPhone

2 Likes

180

Ron Toye
@RonToye

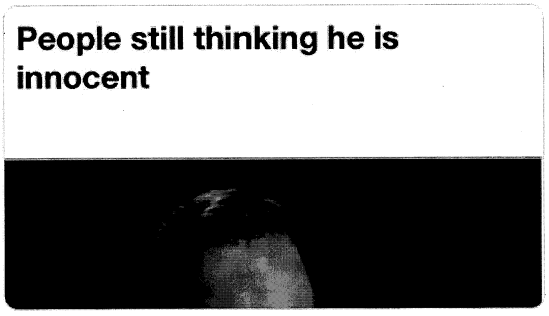
Replying to @DigitalAlucard @DLBot2016 and 4 others

She did try a few times. She didn't know the extent of the assault stuff until recently but the other behavior she did try. But like he said in his apology video at the con he believed the hype.

4:48 AM · Feb 13, 2019 · Twitter for iPhone

181

Ron Toye @RonToye · Feb 13
Replying to @IstandwithVic3 @Rialisms and 5 others



2 1

182

Ron Toye
@RonToye

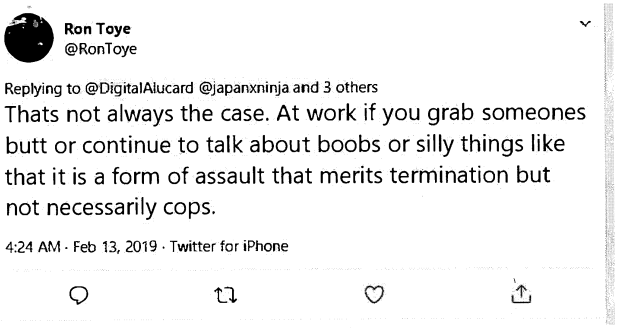
Replying to @BarrenWolfsbane @ashlan_jade_ and @Rialisms

Do you notify the cops when you see someone speeding? Not using a cross walk? There are certain things you report to the cops. We didnt see anything that would merit that. But that's why I can only address the things I have personally knowledge of not everything else

4:47 AM · Feb 13, 2019 · Twitter for iPhone

183

Copy from re:SearchTX



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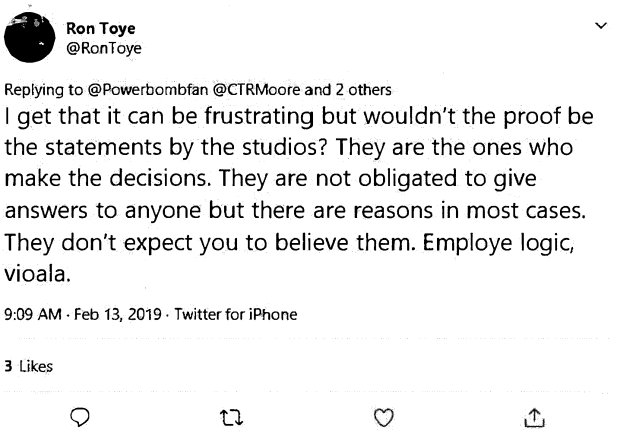

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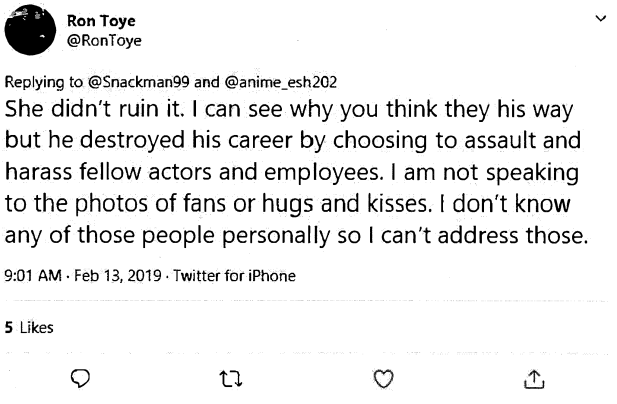


187

Copy from re:SearchTX

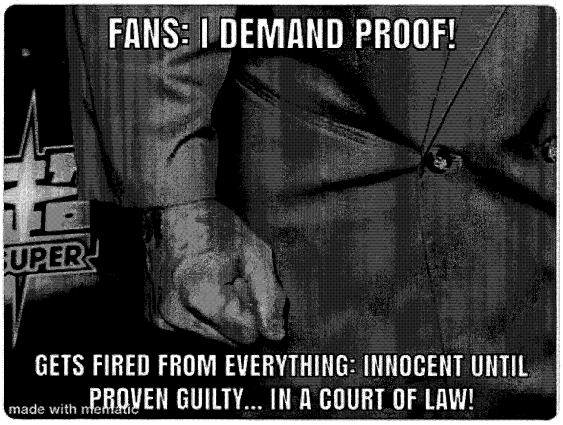
Ron Toye
@RonToye

Replying to @BarrenWolfsbane @ashlan_jade_ and 2 others
You assume he sexual abused people. That's more drastic than the HR investigation. We are taking sexual assault, not on a level of going to the cops but the level of a hostile work environment and identification he shouldn't be at cons until he gets help.

1:15 AM · Feb 13, 2019 · Twitter for iPhone

Ron Toye
@RonToye

Replying to @Liar_isms and @Rialisms
This is just ridiculous and sad. You take the time to make a profile dedicated to my Fiancée because you are upset she defended survivors and she admired she was assaulted and you continue to believe she lied? Laughable at this point that you haven't been able to see it.



10:57 AM · Feb 14, 2019 · Twitter for iPhone

1 Retweet **9** Likes

Ron Toye
@RonToye

Replying to @ACEFAIZ1160 and @anime_esh202
I am not going to continue to beat a dead horse. If you are not smart understand how friendships can change over time it isnt worth speaking with you. When you find out your friend assaulted multiple other friends the exact way you were. Things change

9:51 AM · Feb 15, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @PhrazeXIII @marchimark and 27 others
He says with his own words he messed up. He failed to ask consent. He realized not every person wanted his affection. Is it enough for jail, no unless more comes out, is it enough for warrant termination from employment yes!

10:15 AM · Feb 15, 2019 · Twitter for iPhone

4 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @anoumus @Rialisms and 2 others

Vic admits he wronged women multiple times and he supposedly did it unknowingly and you still ask for evidence? Just because you don't realize what you did was wrong doesn't make it right. Its a sign you need help.

10:13 AM · Feb 15, 2019 · Twitter for iPhone

4 Likes

192

Ron Toye
@RonToye

Replying to @Rayuta and @vicmignogna

You damn right. I don't work for anyone related to this. He can come out and specifically address his fans continual harassment of my fiancée or we can give him what they want a court battle. It's that simple. He knows he fucked up

10:32 AM · Feb 15, 2019 · Twitter for iPhone

1 Retweet **9** Likes

193

Ron Toye
@RonToye

@vicmignogna if you don't get on here and tell people to back the fuck off Monica we are going to have a problem! We will be forced to take you to court. I am tired of this shit and you know what you have done to all these women. Silence is not consent motherfucker! Your choice

10:22 AM · Feb 15, 2019 · Twitter for iPhone

8 Retweets **54** Likes

194

Ron Toye
@RonToye

Replying to @donhill44 @Rialisms and @vicmignogna

Lol! Won't happen. Sorry :) he is done. Sorry for your loss. And get this, it isn't Monica's fault. People have focused in on her but he knows exactly what time it is. And he would agree I am sure stop attacking Monica you are not making it better for him.

10:06 AM · Feb 15, 2019 · Twitter for iPhone

36 Likes

195

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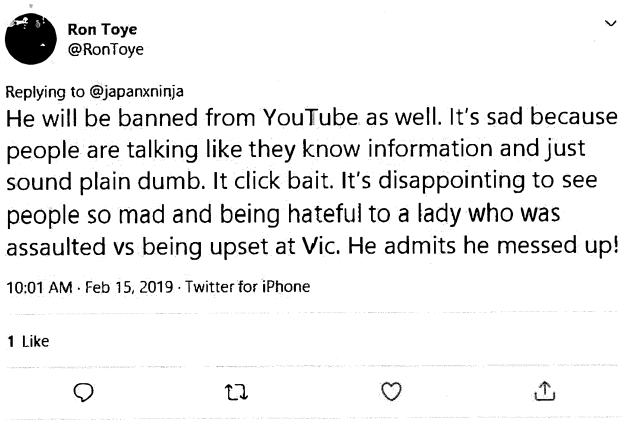


Ron Toye
@RonToye

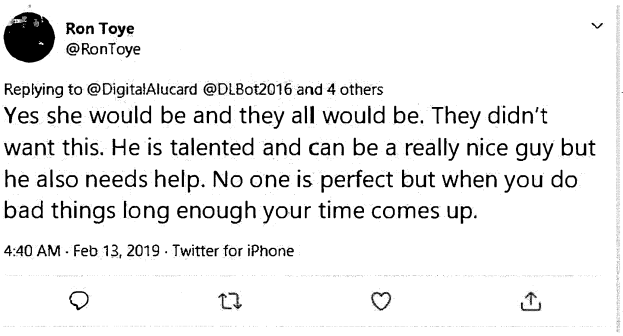
Replying to @japanxninja

He will be banned from YouTube as well. It's sad because people are talking like they know information and just sound plain dumb. It click bait. It's disappointing to see people so mad and being hateful to a lady who was assaulted vs being upset at Vic. He admits he messed up!

10:01 AM · Feb 15, 2019 · Twitter for iPhone

1 Like

196



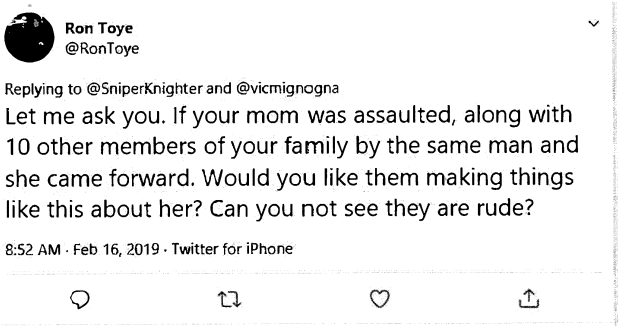
Ron Toye
@RonToye

Replying to @DigitalAlucard @DLBot2016 and 4 others

Yes she would be and they all would be. They didn't want this. He is talented and can be a really nice guy but he also needs help. No one is perfect but when you do bad things long enough your time comes up.

4:40 AM · Feb 13, 2019 · Twitter for iPhone

197



Ron Toye
@RonToye

Replying to @SniperKnighter and @vicmignogna

Let me ask you. If your mom was assaulted, along with 10 other members of your family by the same man and she came forward. Would you like them making things like this about her? Can you not see they are rude?

8:52 AM · Feb 16, 2019 · Twitter for iPhone

198

Ron Toye
@RonToye

Replying to @SniperKnighter and @vicmignogna

Can a person not expect to not be harassed! Just because it's the internet doesn't mean people are free to say and do what they want.

9:26 AM · Feb 16, 2019 · Twitter for iPhone

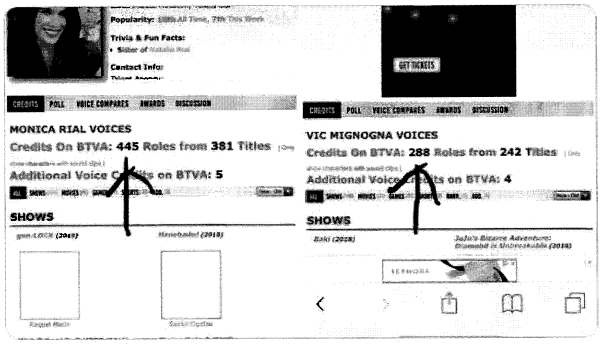
199

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @TonyShadowmoon @deku_a and 3 others

Seriously. Look up :)



9:32 AM · Feb 16, 2019 · Twitter for iPhone

3 Likes

200

Ron Toye
@RonToye

Replying to @DemonkingSilver @TonyShadowmoon and 3 others

Freedom of speech does not also mean freedom of consequences. You do realize that, right?

9:35 AM · Feb 16, 2019 · Twitter for iPhone

1 Retweet **2** Likes

201

Ron Toye
@RonToye

Replying to @AJM94x

Pour taste isn't enough, unfortunately or misinformed. She didn't get him fired he did by assaulting employees and fans. Also, obviously not ugly, look at that picture.

6:05 PM · Feb 16, 2019 · Twitter for iPhone

1 Like

202

Ron Toye
@RonToye

Replying to @deku_a @DemonkingSilver and 3 others

I have one. He ruined his career not me. Let's debate. Are you employed?

9:58 AM · Feb 16, 2019 · Twitter for iPhone

203

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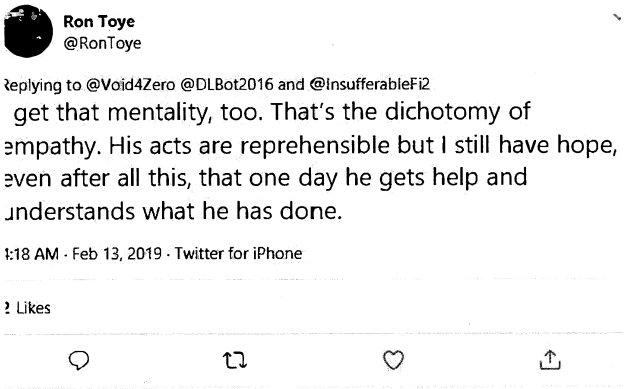

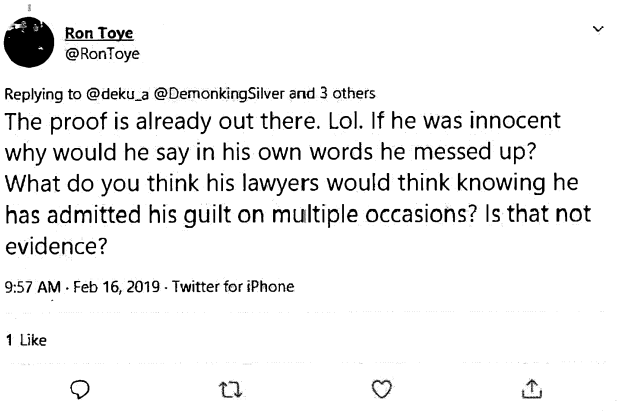

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Cynical_Media @SeanSchemmel and @Rialisms

In that same respect,
Just because they were nice to people at cons doesn't mean they can't be a person who will sexually assault their friends and coworkers

6:30 PM · Feb 16, 2019 · Twitter for iPhone

6 Likes

208

Ron Toye
@RonToye

Replying to @SniperKnighter and @vicmignogna

No direct apology to Monica, or any other survivors. General comment and if people respected his wishes why are people still attacking her? I think we give the fans what they want a court battle and let's see who walks away a registered sex offender :) let's play that game.

8:53 AM · Feb 16, 2019 · Twitter for iPhone

3 Likes

209

Ron Toye
@RonToye

Replying to @ryan_pond @SniperKnighter and @vicmignogna

I am not worried about me in the case. He didn't assault me.

10:15 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

210

Ron Toye
@RonToye

Replying to @deku_a @DemonkingSilver and 3 others

So prove she is a liar. If she lied prove it. Not with silly pictures while promoting a major movie that she was paid to promote. Prove Vic didn't assault her.

9:46 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

211

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @deku_a @KillerCriticMan and 4 others

I never said he raped someone. But sexual assault can be a wide range of unwanted physical contact.

10:15 AM · Feb 16, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @deku_a @DemonkingSilver and 3 others

She has a more successful career than him. It isn't even close. So slow clap that. Do the research and I will wait. Let me know who has more success ;) hint it isn't the boy ;)

9:27 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @TonyShadowmoon @DemonkingSilver and 2 others

Monica has handled this very well and they love her. Vic on the other hand lol has not and his fans have made it worse on him.

9:08 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @SonRedRyanX @Sohji and @vicmignogna

Also, I can't message him privately but I am also showing him and his fans he doesn't get to intimidate people anymore and now the fans have been incited it's time to take this up a notch. He could have handled it better. Not me. I shouldn't have to be pissed.

9:03 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

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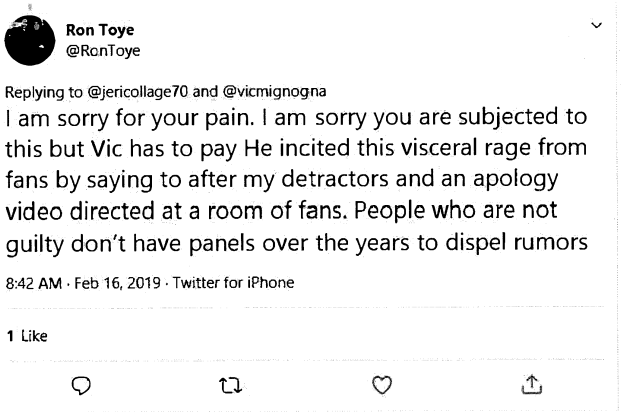


Ron Toye
@RonToye

Replying to @jericollage70 and @vicmignogna
I am sorry for your pain. I am sorry you are subjected to this but Vic has to pay He incited this visceral rage from fans by saying to after my detractors and an apology video directed at a room of fans. People who are not guilty don't have panels over the years to dispel rumors

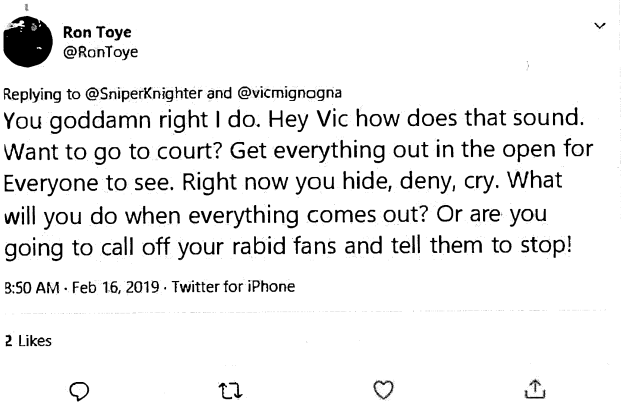
8:42 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @DemonkingSilver and @Rialisms
I don't have to. We did get calls through out a few nights and there are plenty online. Do the research and I don't care about fame 1 bit. What I care about it protecting people from predators.

8:55 AM · Feb 16, 2019 · Twitter for iPhone



Ron Toye
@RonToye

Replying to @SniperKnighter and @vicmignogna
You goddamn right I do. Hey Vic how does that sound. Want to go to court? Get everything out in the open for Everyone to see. Right now you hide, deny, cry. What will you do when everything comes out? Or are you going to call off your rabid fans and tell them to stop!

8:50 AM · Feb 16, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @DemonkingSilver @AlbinodemonEmil and @Rialisms
Well, we are all still employed sooooooooo landed us in a much better situation than you know who 😂 hint it starts with a V and rhymes with sick

8:57 AM · Feb 16, 2019 · Twitter for iPhone

2 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

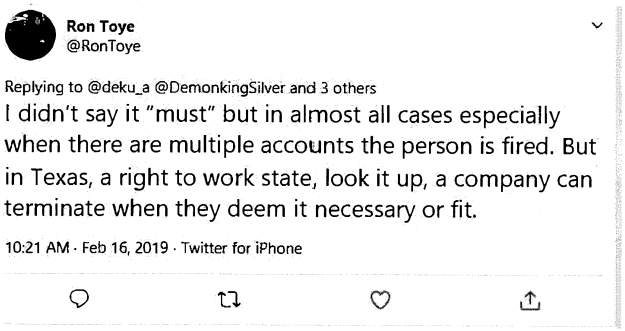
Replying to @deku_a @DemonkingSilver and 3 others

Will be coming soon and when he is completely destroyed I will make sure he is reminded of how well you all did to aid us in our case :)

9:45 AM · Feb 16, 2019 · Twitter for iPhone

1 Like

220



Ron Toye
@RonToye

Replying to @deku_a @DemonkingSilver and 3 others

I didn't say it "must" but in almost all cases especially when there are multiple accounts the person is fired. But in Texas, a right to work state, look it up, a company can terminate when they deem it necessary or fit.

10:21 AM · Feb 16, 2019 · Twitter for iPhone

221

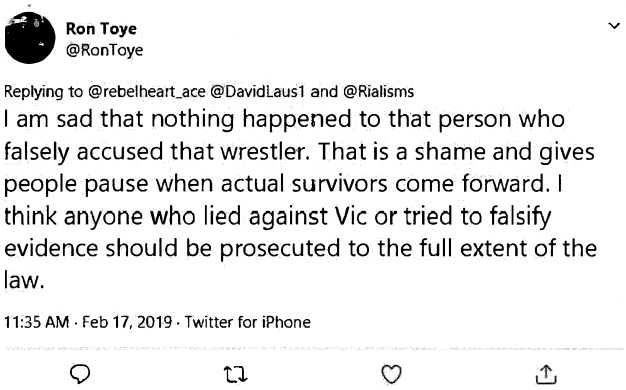
Ron Toye
@RonToye

Replying to @ecunningham0713

She feels bad for hurting fans feelings. She was under a barrage of attacks and she never intended to hurt anyone.

12:40 PM · Feb 17, 2019 · Twitter for iPhone

222



Ron Toye
@RonToye

Replying to @rebelheart_ace @DavidLaus1 and @Rialisms

I am sad that nothing happened to that person who falsely accused that wrestler. That is a shame and gives people pause when actual survivors come forward. I think anyone who lied against Vic or tried to falsify evidence should be prosecuted to the full extent of the law.

11:35 AM · Feb 17, 2019 · Twitter for iPhone

223

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @KenersonJacob @malkom669 and 4 others

How is she a horrible person? Because she stood up for herself and would allow herself to be bullied and is respecting a confidentiality agreement?

11:25 AM · Feb 17, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @K00KIEROT @SDesu12 and 5 others

She didn't say asking for proof is harassment it was the constant barrage of accusations of lying and demands for evidence without the understanding that confidentiality agreements are in place and the continual reminder to fans that cameras were not rolling so testimony was it

11:16 AM · Feb 17, 2019 · Twitter for iPhone

5 Likes

Ron Toye
@RonToye

Replying to @ForgottenXIV @TennesseeWaster and 5 others

Do you realize that there might be reasons? How immature of you to think that people can release information during or after a private investigation and not expect any confidentiality rights to be protected. Good riddance.

10:34 AM · Feb 17, 2019 · Twitter for iPhone

11 Likes

Ron Toye
@RonToye

Replying to @ecunningham0713

He assaulted her. I am sorry if that is hard to hear.

12:31 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @ecunningham0713

Hold out hope but I don't want to be the person who hurts your feelings but unfortunately he did assault people. I can't speak for all the people who came forward just the 10 I know personally.

12:23 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

228

Ron Toye
@RonToye

Replying to @SSJToad @DeceptiTom and 3 others

Lol! Bill of rights lol. So either the companies who have fired them have evidence you will never know about or maybe HR rules are different than the way a court room works either way he is guilty

6:03 PM · Feb 17, 2019 · Twitter for iPhone

2 Likes

229

Ron Toye
@RonToye

Replying to @SheWolf921 and @StrykeSlagar

You know nothing. She doesn't have to fight. His guilt has already been proven :)

11:01 PM · Feb 17, 2019 · Twitter for iPhone

2 Likes

230

Ron Toye
@RonToye

Replying to @4hoshido

Cool. I am happy for him. I want him to get help, identify why he couldn't recognize his shortcomings, and make efforts to come back, if he has changed. I don't like him but that doesn't mean I want his fans to not experience his art. People mess up consequences follow.

12:39 PM · Feb 17, 2019 · Twitter for iPhone

1 Retweet 13 Likes

231

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @RonToye and @Darksoulzero2

She realized her incident wasn't an isolated incident. The hair pulling and whispering in the ear after being asked to stop became more obnoxious and then the realization he did that to a ton of people was the realization it wasn't a joke it was wrong and something had to be done

12:44 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @K00KIEROT @MajinKorra and 6 others

Don't be. It's a hard place to be in considering not having all the info but look at all the actors who know them both and who they are supporting. There are reasons for this and it should be telling.

11:37 AM · Feb 17, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @K00KIEROT @MajinKorra and 6 others

It really is. Look at all the actors who have vouched for Monica, the companies who have terminated him, and the cons that have canceled him. If it was all lies it wouldn't have happened. But it doesn't make it easier for his fans and it's very sad times.

11:43 AM · Feb 17, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @ytf182 and @KirstMathews

She doesn't need additional fame. She has more roles by double than him. It's called a confidentiality agreement. She is meeting with her attorney Monday to get clearance on a full statement:) patience would have helped this but fans want stuff right now without any understanding

11:21 AM · Feb 17, 2019 · Twitter for iPhone

3 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @JustBeingJustME
:) she will have an armed guard with her at all future cons until this all settles down but it's sad to think a person would need that just because she came forward as 1 of many assault survivors. But it will be ok :)

11:39 AM · Feb 17, 2019 · Twitter for iPhone

1 Like

236

Ron Toye
@RonToye

Replying to @ecunningham0713
For my fiancée, Monica, there is no jealousy. She has voiced 550+ to his 250+ roles. It was hard for her to come forward. But it had to be done others came forward, too. All with way more credits to their name than him. So jealousy is not the root of this.

12:31 PM · Feb 17, 2019 · Twitter for iPhone

3 Likes

237

Ron Toye
@RonToye

Replying to @famus_ and @Rialisms
Really well considering she is innocent and told the truth. That's why she is still employed :)

6:20 PM · Feb 17, 2019 · Twitter for iPhone

238

Ron Toye
@RonToye

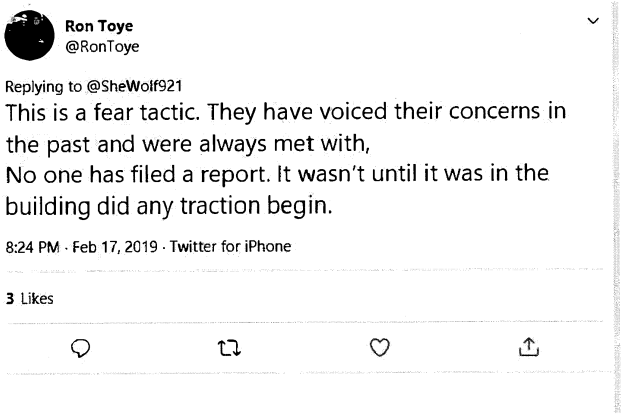
Replying to @Darksoulzero2
Most YouTube videos out there are made by people who don't know either of them. She was friends with Vic, his assault on her was mild but similar to other stories. She added validity to the other accounts. After learning of so many other accounts that's when her opinion changed.

12:42 PM · Feb 17, 2019 · Twitter for iPhone

1 Retweet 2 Likes

239

Copy from re:SearchTX



Ron Toye
@RonToye

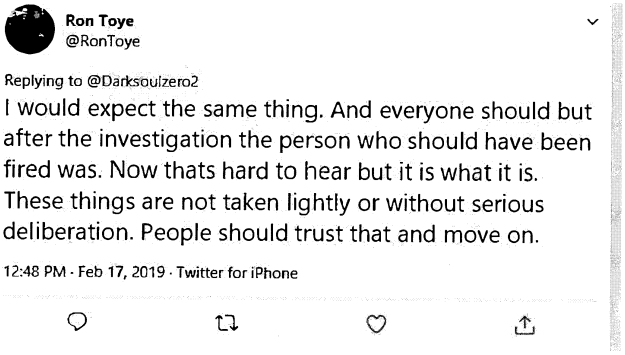
Replying to @SheWolf921

This is a fear tactic. They have voiced their concerns in the past and were always met with,
No one has filed a report. It wasn't until it was in the building did any traction begin.

8:24 PM · Feb 17, 2019 · Twitter for iPhone

3 Likes

240



Ron Toye
@RonToye

Replying to @Darksoulzero2

I would expect the same thing. And everyone should but after the investigation the person who should have been fired was. Now thats hard to hear but it is what it is. These things are not taken lightly or without serious deliberation. People should trust that and move on.

12:48 PM · Feb 17, 2019 · Twitter for iPhone

241

Ron Toye
@RonToye

Replying to @ZFoyez @Rialisms and 5 others

Stayed the same. That's what happens when you tell the truth vs assault people or lie. Her position there is contract actor. :)

11:17 AM · Feb 17, 2019 · Twitter for iPhone

1 Like

242

Ron Toye
@RonToye

Replying to @FernandoMarzana and @Rialisms

She has nothing to apologize for. Vic assaulted her he apologized admitted he assaulted others when he failed to ask for consent

6:17 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

243

Copy from re:SearchTX

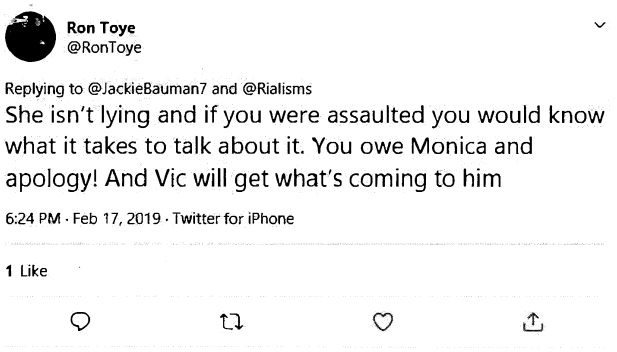
Ron Toye
@RonToye

Replying to @AveryDemarco and @Rialisms

Well he assaulted her so fuck off you bitch who the fuck are to talk to my fiancée this way? You should be ashamed of yourself!

5:23 PM · Feb 17, 2019 · Twitter for iPhone

1 Like



Ron Toye
@RonToye

Replying to @JackieBauman7 and @Rialisms

She isn't lying and if you were assaulted you would know what it takes to talk about it. You owe Monica and apology! And Vic will get what's coming to him

6:24 PM · Feb 17, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @RonToye @Josh_WyldeJames and @SeanSchemmel

Let me add to that, when they fired him, and you told your story online, but due to confidentiality couldn't say everything, how would you handle everyone calling for proof? Threats to your family? Harassing calls? Asking for a friend.

3:30 PM · Feb 18, 2019 · Twitter for iPhone

10 Likes

Ron Toye
@RonToye

Replying to @SSJToad @Void4Zero and 4 others

Those were the only claims that mattered in the termination. Since they are not criminal investigators they did not work in those claims. Those people would need to file a report. Their decision was based on things that happened to funimation employees

8:31 AM · Feb 18, 2019 · Twitter for iPhone

2 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @ecunningham0713
:) you are right. It is time for peace and healing. False stuff is coming out and it's annoying. I am not his friend but like I have said before, if someone lied against him I would support him in a defamation suit.

8:43 PM · Feb 18, 2019 · Twitter for iPhone

4 Likes

248

Ron Toye
@RonToye

Replying to @ecunningham0713
The thing is, a lot of people assume that all actors are friends with each other. They have to be nice at cons or during promotional events. It can be confusing to fans but in the end they were coworkers at most never friends.

1:27 PM · Feb 18, 2019 · Twitter for iPhone

2 Likes

249

Ron Toye
@RonToye

Replying to @bicyhot
I agree with you. Everyone who made a false claim should be ashamed of themselves and prosecuted. It makes it hard for real survivors to come forward. No one should be falsely accusing him. It isn't fair to him or the others with legitimate accounts.

1:36 PM · Feb 18, 2019 · Twitter for iPhone

13 Likes

250

Ron Toye
@RonToye

Replying to @Dominique_Skye and @xXReiBearXx
Some people will never see it. There is a reason not one single industry professional has defended him. None have chimed in and said "none of this is possible." Logic and reason is lost on people who won't take a moment to actually try.

6:07 PM · Feb 18, 2019 · Twitter for iPhone

8 Likes

251

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @ecunningham0713
So they were coworkers and when she heard their stories it hurt her feelings. :(then the online stories started to roll in and it got worse :(

1:46 PM · Feb 18, 2019 · Twitter for iPhone

Ron Toye
@RonToye

Replying to @SSJToad @Void4Zero and 4 others
Do you work there? Lol you have no idea and do you think they don't know how to do an investigation? Lol people talk like they know something. Refute people who actually work there it's hilarious

8:33 AM · Feb 18, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @SeanSchemmel
I love you man! Thank you for taking a stand. Not just for Monica but for all people who were hurt. It speaks volumes. The words of the haters will be forgotten but your words, to and for survivors, will be remembered for the rest of their lives. ♥♥♥

1:06 PM · Feb 18, 2019 · Twitter for iPhone

44 Likes

Ron Toye
@RonToye

Replying to @suckrightnow and @SeanSchemmel
Sean is an amazing dude in real life. He is amazingly intelligent, hardworking, talented, and compassionate. That's why it's such a big deal to see him this angry. It should speak volumes to those still not sure what to believe.

1:10 PM · Feb 18, 2019 · Twitter for iPhone

3 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @TheDemonEyeX @DereckRPoirier and 4 others

She is a disgrace and I am not sure she was part of the investigation. All liars should be prosecuted and the hate. Needs to stop. The harassment and false claims all of it.

10:43 AM · Feb 19, 2019 · Twitter for iPhone

256

Ron Toye
@RonToye

Replying to @Gasglow @Rialisms and 6 others

Idiots. People keep asking the same idiotic question. The evidence is the testimony, corroborated by multiple funimation employees and other actors. The investigation happened, he was fired. Bam evidence but people can't understand that.

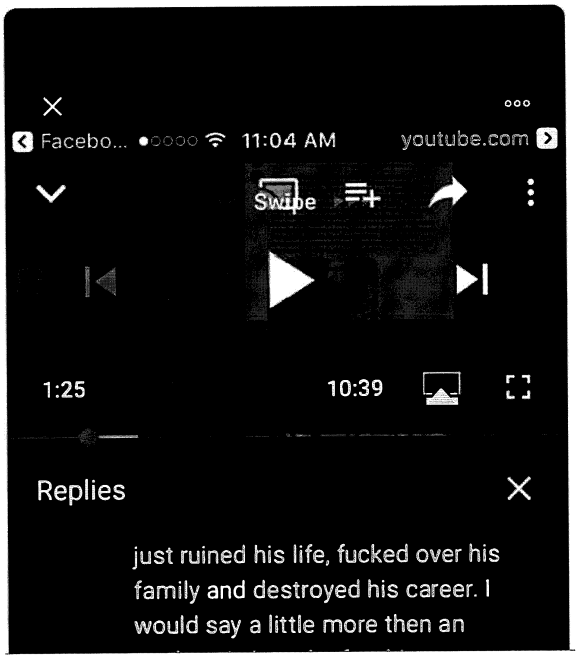
8:39 AM · Feb 19, 2019 · Twitter for iPhone

8 Likes

257

Ron Toye
@RonToye

Why don't victims come forward? Look at this! @FUNimation you better do something right now!



258

Ron Toye
@RonToye

Replying to @McBenefit @YouTube and @vicmignogna

Correct. The #kickvic is not a lie. He needed to be removed from from funimation and from cons. He created a hostile environment. I stand with real survivors. I am just admitting where I went wrong and saying I could have been more professional in my responses :)

2:51 PM · Feb 19, 2019 · Twitter for iPhone

17 Likes

259

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @McBenefit @YouTube and @vicmignogna
I shared a photo that was fake. I don't support falsified claims and I told people I would apologize to him if I ever did. I have to be a man of my word. He did hurt Monica and a few of my friends but the false info that others are making on both sides will get someone hurt.

2:38 PM · Feb 19, 2019 · Twitter for iPhone

11 Likes

Ron Toye
@RonToye

Replying to @Katerationopia @YouTube and @vicmignogna
The real have my support but I won't tolerate smear tactics against either side. As much as I don't like him it isn't fair. We have to bring peace and if I can try to build a bridge during these times I hope people will see that and calm down.

2:40 PM · Feb 19, 2019 · Twitter for iPhone

1 Like

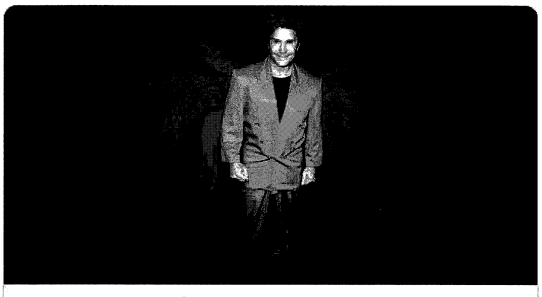
Ron Toye
@RonToye

Replying to @MarKGrissom24 and @Rialisms
It's hard for the fans but he is working on himself. He needs your support. I haven't been very nice to him and I realized I was letting my hate block healing. I called him to talk it out.

8:44 PM · Feb 19, 2019 · Twitter for iPhone

12 Likes

Ron Toye @RonToye · Feb 19
One of Anime's Biggest Voices Accused of Sexual Harassment
io9.gizmodo.com/one-of-anime-s... via @io9.



One of Anime's Biggest Voices Accused of Sexual Harassment
Last summer, voice actor Vic Mignogna went into a booth with a few others to record audio for a video game. At one point, Mignogna asked t...
io9.gizmodo.com

85 3 35

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @zamasumeatyabs and @Rialisms

We won't tolerate any one attacking you. We welcome court. The reason it sounds similar is that it's a pattern he knows he needs to break. That's why he is getting help and admitted he crossed the line.

9:03 PM · Feb 19, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @Breloominati7 @Rialisms and 6 others

You have no idea what you are talking about. She is a girl he is a boy she gains nothing with him being fired lol. Obviously you are clueless

8:20 AM · Feb 19, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

Replying to @krymzen_n @Rialisms and 6 others

She told the truth. She hasn't lost fans unless they were fake to begin with. True fans would know she wouldn't lie or do somthing to hurt anyone.

8:44 AM · Feb 19, 2019 · Twitter for iPhone

7 Likes

Ron Toye
@RonToye

Replying to @charleshaley89 @AlucardsBro and 2 others

Thank you. :) people are hurting and blaming and focusing their hurt on Monica without realizing she isn't the main reason he was terminated.

6:30 PM · Feb 19, 2019 · Twitter for iPhone

4 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @jackson_five13 @Rialisms and 6 others

Her's is fine :) notice she is still employed and going to cons. :)

8:32 AM · Feb 19, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @MistressWaifu and @Rialisms

Stand by him. He needs supporters. You are right there have been liars. I bought one and even reposted their info. The real survivors would never stand for falsified evidence or harassment.

10:58 PM · Feb 19, 2019 · Twitter for iPhone

2 Likes

Ron Toye
@RonToye

I also want to say that I have acted childish. Monica was under attack. I responded to some with profanity. Vic needs help for what he did but I could have handled this better. No one wants division. Sorry I can't produce additional evidence but I am changing the way

2:19 PM · Feb 19, 2019 · Twitter for iPhone

55 Likes

Ron Toye
@RonToye

I go about this. People don't need anymore hate. To the people I was rude to, I am sorry. To @vicmignogna I hope you get the help you are working on and I would like to talk to you man To man on the phone to address my issues and extend an olive branch. If you are down dm for #

2:22 PM · Feb 19, 2019 · Twitter for iPhone

3 Retweets 63 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @SlaterDangerYTG @secretvisions and 3 others

But, the VA's who have come forward have known him for a long time. They have seen the patterns in his behavior, suffered their own assaults by him. The fans that were assaulted is horrible, too But people who have known him are aware of more than those who met him for 19 seconds

10:48 AM · Feb 9, 2019 · Twitter for iPhone

6 Likes

Ron Toye
@RonToye

Replying to @BryanSi49140245 @Rialisms and 6 others

You really need to watch your words buddy. She did nothing wrong. That Fucking piece of shit did. People want more from her than she can give. We have been receiving harassing calls for weeks and you wonder why she won't stand for harassment I hope you never experience this.

8:31 AM · Feb 19, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Replying to @JamesHerdmanxD and @Rialisms

Logic would say the lady would be more competitions since she is a lady and can go for the same roles. lol. Vic isn't competition since he goes for the boy or adult men roles

10:39 AM · Feb 19, 2019 · Twitter for iPhone

4 Likes

Ron Toye
@RonToye

Replying to @Filip39610220 @Rialisms and 6 others

It's her job lol not hard to figure out and yes she will have guards. She shouldn't have to not go to work because fans can't act mature and take their L like adults. The guy was terminated due to inappropriate conduct it's over.

8:42 AM · Feb 19, 2019 · Twitter for iPhone

5 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Yaebithezombie and @Rialisms

Good :) don't rush to judge just listen and be nice :) if it goes to court we will be there and additional truth will come out :) we just want peace.

9:25 PM · Feb 19, 2019 · Twitter for iPhone

276

Ron Toye
@RonToye

Replying to @Alielbaryeshua

Monica wasn't silent to that her and I both said bring it on. We would love to go to court :)

6:32 PM · Feb 20, 2019 · Twitter for iPhone

1 Retweet **2** Likes

277

Ron Toye
@RonToye

Replying to @CatsHaveWings @Rialisms and @SeanSchemmel

You will know them by their fruit. For all those asking for evidence. Matthew 7:15-20 his works are bringing forth fruit and the evidence is in the terminations.

4:45 PM · Feb 20, 2019 · Twitter for iPhone

8 Likes

278

Ron Toye
@RonToye

Replying to @thisguystweet and @Rialisms

Maybe it's because he is guilty 🤡 have you considered that? Has any of her coworkers turned on her? That would be a big no, they have supported her. Maybe just maybe the people who actually know him understand the situation better than the fans? Are you following me?

4:37 PM · Feb 20, 2019 · Twitter for iPhone

8 Likes

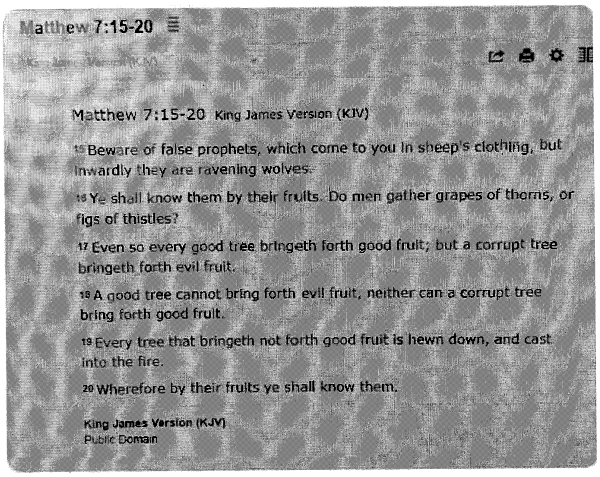
279

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @ThisIsSoDumb6 and @Rialisms

He isn't innocent he is getting fired for a reason. Think people!



5:52 PM · Feb 20, 2019 · Twitter for iPhone

1 Like

280

Ron Toye
@RonToye

Replying to @NevnHiwEjuam

It's just funny how people take YouTube as evidence and the people can't pronounce names right, know where I work, or my marital status. lol but that's the evidence people point to that Vic is innocent lol!

6:40 PM · Feb 20, 2019 · Twitter for iPhone

1 Like

281

Ron Toye
@RonToye

Replying to @Tubhero and @ChrisRMaglione

One instance of good, 1000 instances of good doesn't make up for at least 4 accounts of bad that I know personally. Countless others are lined up to tell their story.

8:05 AM · Feb 21, 2019 · Twitter for iPhone

1 Like

282

Ron Toye
@RonToye

Replying to @LadyRigz @roseshana28 and 4 others

We are not avoiding court lol we welcome it. The great news all the skeletons he thought were hiding are surfacing. He knows it. That's why he is lawyering up :) he incited this when in his own words go after my detractors ;)

2:51 PM · Feb 21, 2019 · Twitter for iPhone

1 Like

283

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @LadyRigz @roseshana28 and 4 others

They didn't have an affair lol he assaulted her. At the time of the assault she was single but working in being in a relationship with a very cool dude, Rawly.

1:52 PM · Feb 21, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @IMKIRA18 @marchimark and 35 others

He assaulted Monica and by doing that violated the trust of his fiancée in 2007 lol so yeah he is a great guy and totally trust worthy lol.

3:18 PM · Feb 23, 2019 · Twitter for iPhone

4 Likes

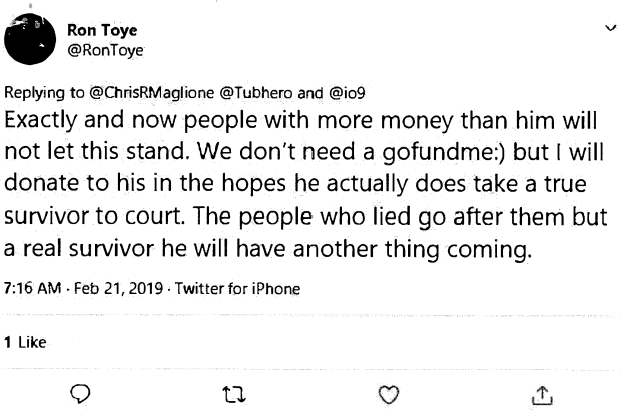
Ron Toye
@RonToye

Replying to @lostnumbers2 and @io9

I want to mend fences, yes, but that doesn't mean I think he doesn't deserve everything he is getting. Want to talk sleazy, how about asking for money from your fans to pay for legal help when you know darn well there is never going to be a court case. ;)

7:04 AM · Feb 21, 2019 · Twitter for iPhone

2 Likes



Ron Toye
@RonToye

Replying to @ChrisRMaglione @Tubhero and @io9

Exactly and now people with more money than him will not let this stand. We don't need a gofundme:) but I will donate to his in the hopes he actually does take a true survivor to court. The people who lied go after them but a real survivor he will have another thing coming.

7:16 AM · Feb 21, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Tubhero @io9 and @Rialisms

It will be epic :) I can't wait for that moment to come. I feel bad for his fans, they asked for it, and when that day comes I expect a line of people to apologize to Monica and every other survivor

7:20 AM · Feb 21, 2019 · Twitter for iPhone

5 Likes

Ron Toye
@RonToye

Replying to @ComixVillain @McBenefit and 29 others

Nope won't delete it but I am going to have them review this entire situation. I welcome a case in court I just don't need fans to fund it. ;)

2:45 PM · Feb 21, 2019 · Twitter for iPhone

31 Likes

Ron Toye
@RonToye

Replying to @Basedant1 and @io9

Still expecting a video or pic to be the only form of proof. How about the video of Vic saying he messed up? Got lazy and failed to ask for consent? How about him apologizing for doing wrong? Why he is in counseling? If he was innocent why would HE say those things?

6:59 AM · Feb 21, 2019 · Twitter for iPhone

1 Retweet **3** Likes

Ron Toye
@RonToye

Replying to @Tubhero @io9 and @Rialisms

No she isn't. You all will see and you have no idea the depth of this. The info in the article is just the tip of the iceberg. He is asking fans to pay for his legal help. Hilarious. I will donate to it to prove a point. He knows what he did admits it and now it's on.

7:08 AM · Feb 21, 2019 · Twitter for iPhone

1 Like

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Tubhero and @io9

Lol! You still hanging your hat on that position? Bro, look at the prolific people who have come forward with their stories and interactions with him. Why do you think no actor has come forward to support him?

6:56 AM · Feb 21, 2019 · Twitter for iPhone

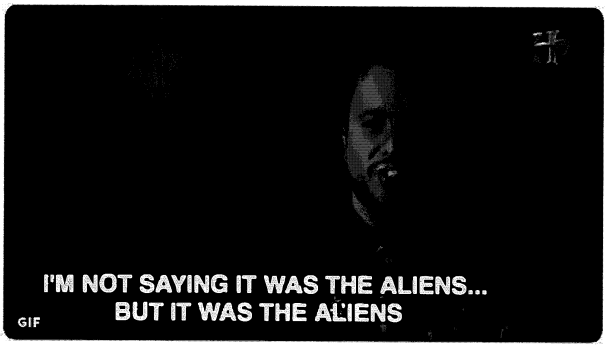
1 Like

292

Ron Toye
@RonToye

Replying to @Spinosuchus and @io9

Lol. I love this! People who still think Vic is innocent.



7:00 AM · Feb 21, 2019 · Twitter for iPhone

2 Likes

293

Ron Toye
@RonToye

Replying to @THEL0CALGUY

I am not worried about him being lawyered up :) I was only speaking towards me sharing a post that was later found to be fake. I don't stand for falsified evidence. :) I welcome a case. It's just sad Vic has to use fans to pay for it.

2:40 PM · Feb 21, 2019 · Twitter for iPhone

3 Likes

294

Ron Toye
@RonToye

Replying to @YTPJ_Henry @McBenefit and 29 others

Called out yes, threatened no. :) stand by my tweets tried calling him but he won't return my calls :)

2:44 PM · Feb 21, 2019 · Twitter for iPhone

8 Likes

295

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Tubhero @ChrisRMaglione and @io9

You have no idea what you are talking about. Trust the people who are close to this. Who actually know him.

7:09 AM · Feb 21, 2019 · Twitter for iPhone

1 Like

Ron Toye
@RonToye

Replying to @Tubhero @ChrisRMaglione and @io9

Ask yourself this, what if he doesn't take one person to court? What will you think when I make a donation to his gofundme with the hopes we go to court to prove to the world who he is? If he takes no one to court he stole fans money. 100k in legal fees come on.

6:53 AM · Feb 21, 2019 · Twitter for iPhone

3 Likes

Ron Toye
@RonToye

Following

Replying to @Deiyui

What about innocent until proven guilty? Is that only Vic? Monica is innocent of lying until proven guilty, right? why is it ok to harass her and demand proof from her but you haven't demanded proof from him that he didn't assault Monica or countless others? Where is his proof?

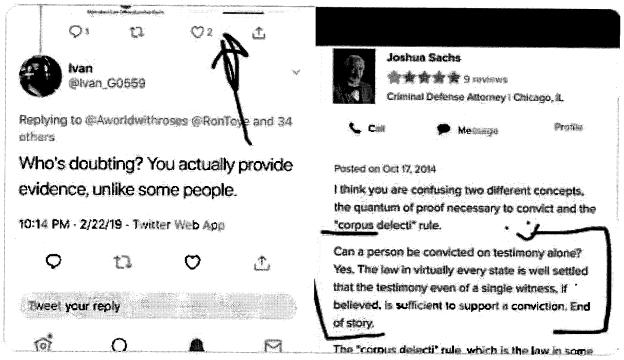
11:03 PM - 22 Feb 2019

20

Ron Toye
@RonToye

Replying to @Ivan_G0559 @Aworldwithroses and 34 others

So this is evidence? Read this slowly to anyone who asks another person for pics or videos as the only form of proof needed to convict ;)



11:34 PM · Feb 22, 2019 · Twitter for iPhone

1 Retweet 3 Likes

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Ivan_G0559 @Aworldwithroses and 34 others

Well based on the picture it clearly states testimony even by one person can be used to convict so, the people who came forward provided evidence, too, just not the kind some people like.

11:32 PM · Feb 22, 2019 · Twitter for iPhone

2 Likes

300

Ron Toye
@RonToye

Follow

Replying to @nach0_76

You should be offended he isn't risking his own money in the lawsuit. Don't you think it's weird he is using fans to pay for this? Also, you can still donate to his wedding fund oh the lady he is no longer with and cheated on multiple times. Track record 100%

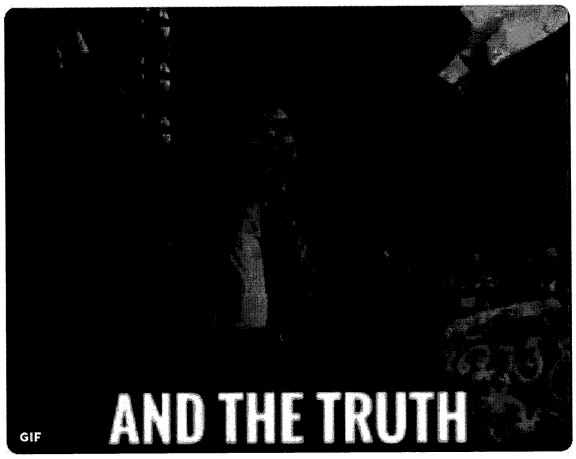
11:08 PM · 22 Feb 2019

301

Ron Toye
@RonToye

Replying to @Dominique_Skye @Andrew71085742 and 36 others

Once these trolls take two seconds to think it through and finally see that maybe just maybe Vic isn't innocent of all the 100's of accounts of assault. Or take a second to ask themselves why not one person is afraid of going to court with him.



3:40 PM · Feb 23, 2019 · Twitter for iPhone

10 Likes

302

Ron Toye
@RonToye

Replying to @Deiyui

What about innocent until proven guilty? Is that only Vic? Monica is innocent of lying until proven guilty, right? why is it ok to harass her and demand proof from her but you haven't demanded proof from him that he didn't assault Monica or countless others? Where is his proof?

1:03 AM · Feb 23, 2019 · Twitter for iPhone

303

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @nightblur @marchimark and 37 others

Lol, again. That's not evidence. Did you read her letter? And he assaulted way more people than her. There are assaults the public isn't aware of and those were the actual ones that got him fired. That's why we can be so confident in our position. :)

4:17 PM · Feb 23, 2019 · Twitter for iPhone

11 Likes

304

Ron Toye
@RonToye

Replying to @marchimark @Coffeegaijin and 33 others

#proof #evidence this evidence what can be used to help Vic win in court. Lol that and fans money. ;) sad that he cheats on his fiancé, assaults ladies, robs fans, and is still treated as someone with great morals.

1:33 AM · Feb 23, 2019 · Twitter for iPhone

33 Likes

305

Ron Toye
@RonToye

Replying to @nightblur @marchimark and 37 others

Sammi is not a Funi employee. She might have contract acted there in a few bit parts but already condemned falsification of evidence or reporting falsely. :) soooooooo continue with logic, if they investigated and then decided to not work with him anymore what would that mean???

4:01 PM · Feb 23, 2019 · Twitter for iPhone

6 Likes

306

Ron Toye
@RonToye

Replying to @RoccoLostInHull

You don't understand the concept of not needing to go to court to get results? Once the major accusations started coming out against Cosby how many roles did he get? When was the last time he was in a movie? Court is what got him convicted not fired. The firing happened first

12:55 AM · Feb 23, 2019 · Twitter for iPhone

307

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Coffeegaijin @Spacebird77 and 33 others

That's because you don't have the inside info they had to fire him 🤦 this isn't complicated, they are a major production company, do you think they make decisions like this if they were not 100% sure?

1:25 AM · Feb 23, 2019 · Twitter for iPhone

2 Retweets **32** Likes

308

Ron Toye
@RonToye

Replying to @nightblur @marchimark and 38 others

It's actually firmly planted in truth. :) you all believe YouTube personalities who can't pronounce the names of the people they are talking about correctly, have zero inside knowledge, and this is the rock you stand on??? And a guy who has get money from fans to go to court.

4:11 PM · Feb 23, 2019 · Twitter for iPhone

16 Likes

309

Ron Toye
@RonToye

Replying to @jackson_five13 @OllieSigns and 36 others

Quick question, do you have a job? If yes, on Monday, contact HR with your exciting plans to hang mistletoe around your place or work, let them know you plan on surprising female coworkers with a kiss or 30. But let them know it's all good since you are acquainted with them. ;)

3:25 PM · Feb 23, 2019 · Twitter for iPhone

4 Likes

310

Ron Toye
@RonToye

Replying to @Andrew71085742 @Dominique_Skye and 37 others

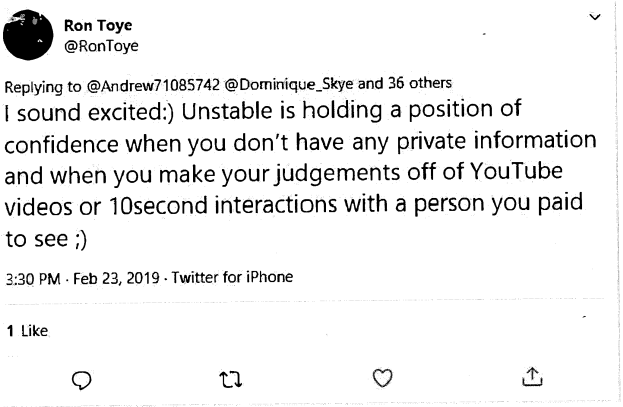
It's not a brave face it's an excited face. Do you know who the burden of proof is on concerning a defamation case? He will have to prove he didn't assault Monica and countless others who are just excited to put the final nail in the coffin 🩹 of his career.

3:53 PM · Feb 23, 2019 · Twitter for iPhone

2 Likes

311

Copy from re:SearchTX



Ron Toye
@RonToye

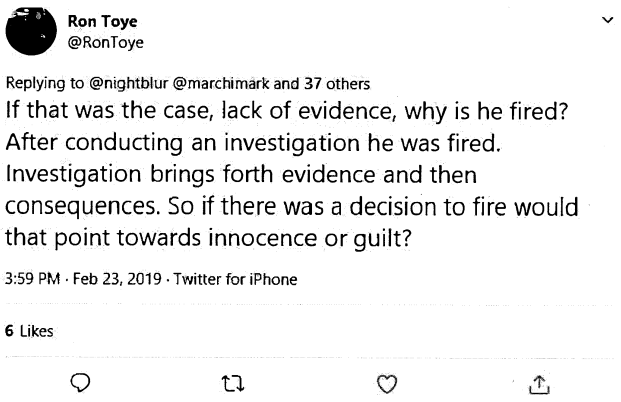
Replying to @Andrew71085742 @Dominique_Skye and 36 others

I sound excited:) Unstable is holding a position of confidence when you don't have any private information and when you make your judgements off of YouTube videos or 10second interactions with a person you paid to see ;)

3:30 PM · Feb 23, 2019 · Twitter for iPhone

1 Like

312



Ron Toye
@RonToye

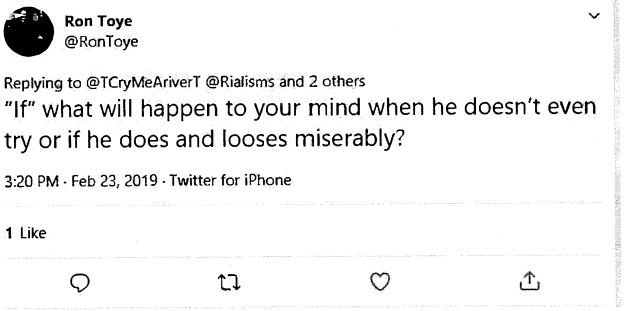
Replying to @nightblur @marchimark and 37 others

If that was the case, lack of evidence, why is he fired? After conducting an investigation he was fired. Investigation brings forth evidence and then consequences. So if there was a decision to fire would that point towards innocence or guilt?

3:59 PM · Feb 23, 2019 · Twitter for iPhone

6 Likes

313



Ron Toye
@RonToye

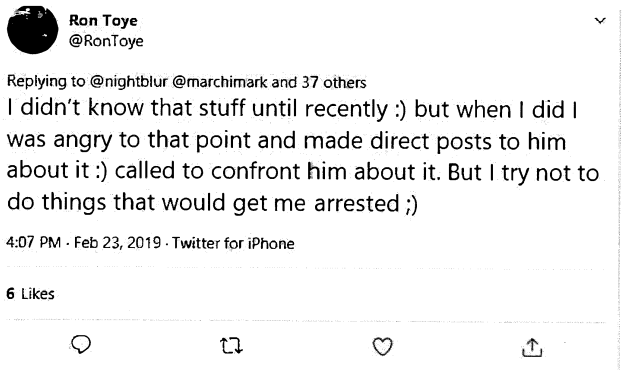
Replying to @TCryMeAriverT @Rialisms and 2 others

"If" what will happen to your mind when he doesn't even try or if he does and looses miserably?

3:20 PM · Feb 23, 2019 · Twitter for iPhone

1 Like

314



Ron Toye
@RonToye

Replying to @nightblur @marchimark and 37 others

I didn't know that stuff until recently :) but when I did I was angry to that point and made direct posts to him about it :) called to confront him about it. But I try not to do things that would get me arrested ;)

4:07 PM · Feb 23, 2019 · Twitter for iPhone

6 Likes

315

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @Muckchips
I did and the people who are saying those things about her are the reason she got an attorney. Words have weight and she knew the cost of posting about this. She knew she wasn't lying but the people trying to manipulate and make false claims on both sides need to be prosecuted

6:37 AM · Feb 13, 2019 · Twitter for iPhone

2 Likes

316

Ron Toye
@RonToye

Replying to @nightblur @Dominique_Skye and 38 others
That isn't evidence he didn't assault her lol. Did you read her letter? What is proof is his own words when he said he messed up, got lazy, etc he didn't ask for consent and that's not even all the additional things that the public doesn't have record of. :)

3:51 PM · Feb 23, 2019 · Twitter for iPhone

18 Likes

317

Ron Toye
@RonToye

Replying to @nach0_76
You should be offended he isn't risking his own money in the lawsuit. Don't you think it's weird he is using fans to pay for this? Also, you can still donate to his wedding fund oh the lady he is no longer with and cheated on multiple times. Track record 100%

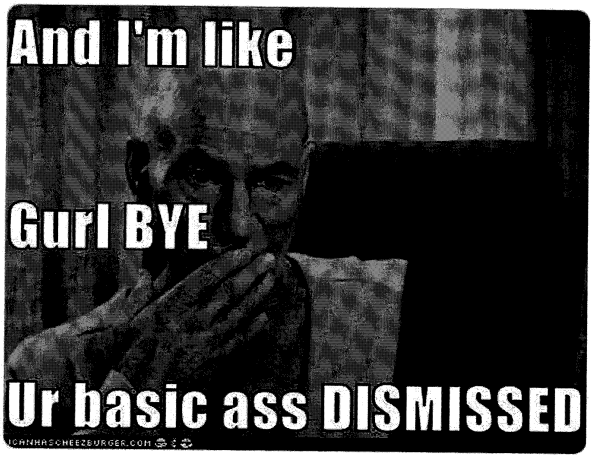
1:08 AM · Feb 23, 2019 · Twitter for iPhone

1 Retweet **37** Likes

318

Ron Toye
@RonToye

Replying to @Dominique_Skye @shane_holmberg and 35 others
How I feel every single time a person says proof or istandwithvic or innocent until proven guilty. After weeks of this being out people still think he is innocent and they are digging for anything to smear the people who came forward vs taking a second to think what if he isn't.



3:09 PM · Feb 23, 2019 · Twitter for iPhone

319

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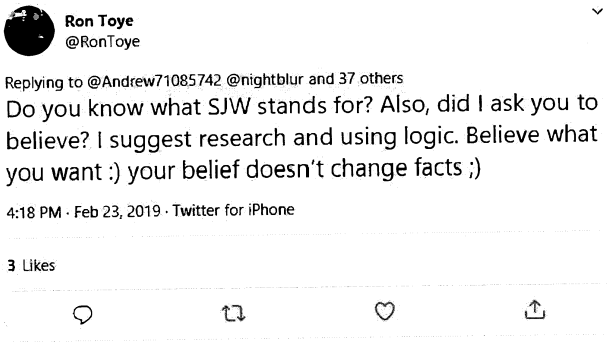

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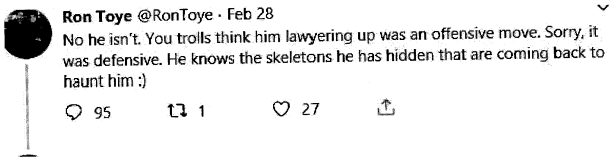

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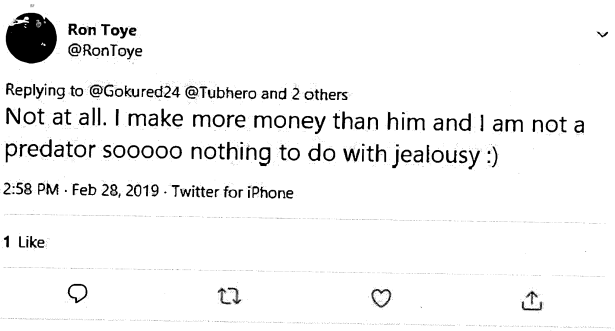


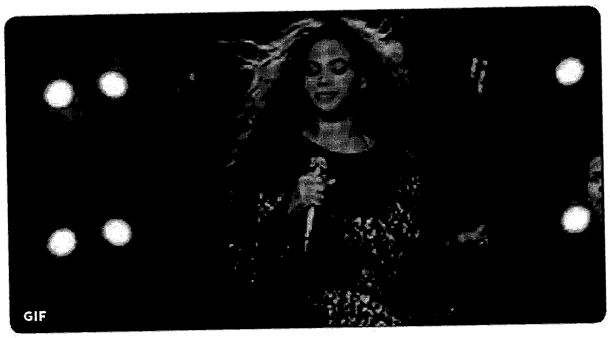
323

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @supermar1oultra @vicmignogna and @Rialisms

It's more like lol. He knows the skeletons he has hidden. ;) lawyering up was not an offensive move it was a defensive move and all you trolls are delusional thinking he is going to go after Funi, Monica, or any of the survivors :)



2:54 PM · Feb 28, 2019 · Twitter for iPhone

18 Likes

324

Ron Toye
@RonToye

Replying to @HarambePrivate @Rialisms and @ignorethenoises

People still think he is innocent. laughable!

3:01 PM · Feb 28, 2019 · Twitter for iPhone

1 Like

325

Ron Toye
@RonToye

Replying to @abauman0 @Rialisms and 2 others

Lol what do you think they did lol. That's why he was fired but they also stood up to people calling their friends liars. :)

2:35 PM · Feb 28, 2019 · Twitter for iPhone

13 Likes

326

Ron Toye
@RonToye

Replying to @CommisarWarder @KayGRadley and 9 others

No one is looking to settle with Vic. Just want to make sure you have a few facts :) we hold fast to our current position and would welcome a chance to go to court :)

8:27 PM · Mar 1, 2019 · Twitter for iPhone

1 Retweet **5** Likes

327

Copy from re:SearchTX

Ron Toye
@RonToye

Replying to @danielcardona09 @TyBeard10 and 5 others

I never called them a coward. See, miss reading context. I let them know my contact info and that I am here when ready :) but others tried to play it as I knew they were closed that's why I called. I will be calling Monday, too. :)

9:30 AM · Mar 2, 2019 · Twitter for iPhone

5 Likes

328

Ron Toye
@RonToye

Replying to @NickRekieta

Me checking, doing really well :) not worried 1 bit. :) also, just to let everyone know, he hasn't contacted me personally just via twitter and that is weak. I see the PR move that they are trying to do but I still feel bad that the money being used is fans not his.

1:49 PM · Mar 2, 2019 · Twitter for iPhone

1 Like

329

Ron Toye
@RonToye

Replying to @Deanna_Minion and @marchimark

They are ignorant people who think they are more apprised to a situation than people who are actually in the middle of it. They want clicks and are trying to capitalize on the suffering of survivors of sexual assault.

5:55 AM · Mar 4, 2019 · Twitter for iPhone

330

Ron Toye
@RonToye

Replying to @ronelm2000 @zCduHRyejyAeJPe and 3 others

She would be there and about 30 other ladies :)

9:10 AM · Mar 7, 2019 · Twitter for iPhone

1 Like

331

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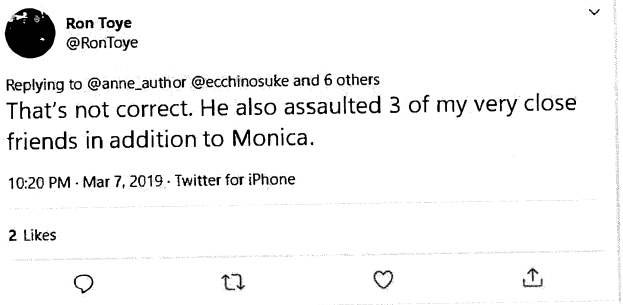

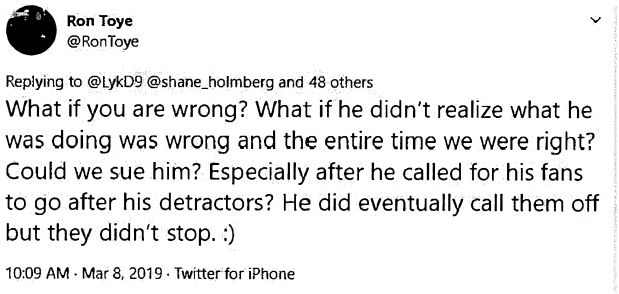

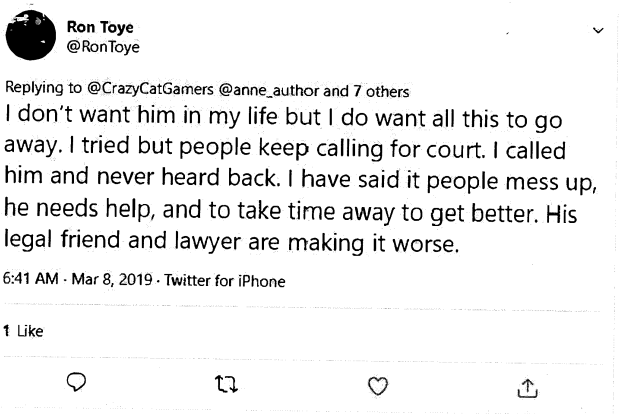

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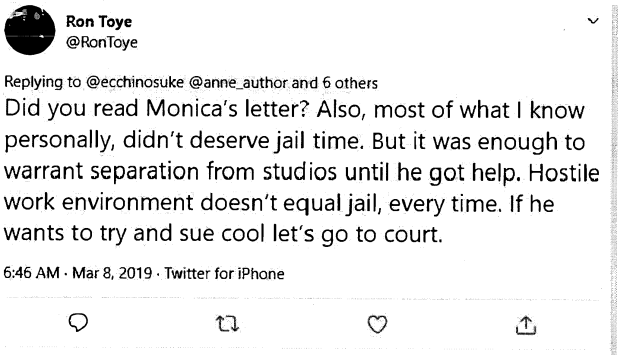

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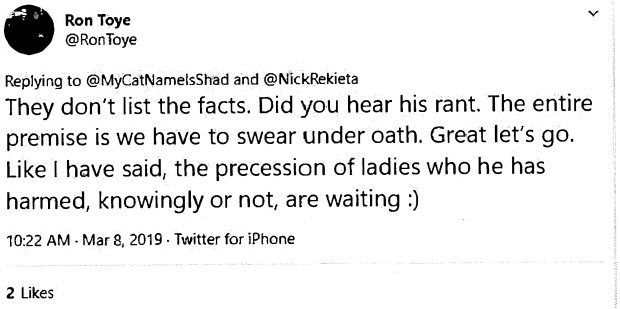

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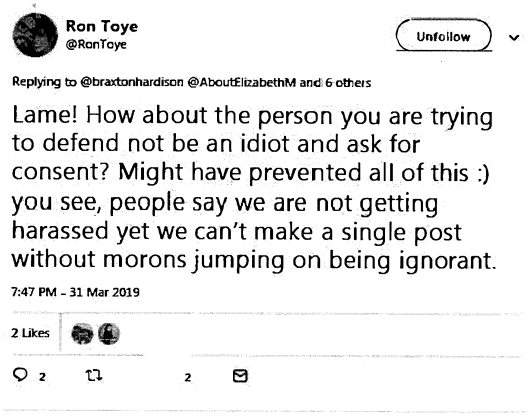

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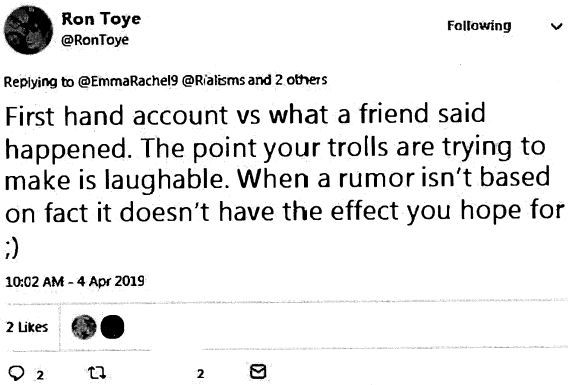

342

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Exhibit K

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NO. 141-307474-19

VICTOR MIGNOGNA,	)	IN THE DISTRICT COURT
	)	
Plaintiff,	)	
	)	
VS.	)	TARRANT COUNTY, TEXAS
	)	
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE,	)	
	)	
Defendants.	)	141st JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF

VICTOR MIGNOGNA

JUNE 26, 2019

ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MIGNOGNA, produced as a witness at the instance of the DEFENDANTS, and duly sworn, was taken in the above-styled and numbered cause on June 26, 2019, from 10:05 a.m. to 5:39 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Job No. 132281

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

A P P E A R A N C E S

FOR THE PLAINTIFF:
Mr. Ty Beard, Esq.
Ms. Carey-Elisa Christie, Esq.
BEARD HARRIS BULLOCK HUGHES, PC
100 Independence Place
Suite 101
Tyler, Texas 75703
(903) 509-4900
ty@beardandharris.com
carey@beardandharris.com

FOR THE DEFENDANTS RONALD TOYE and MONICA RIAL:
Mr. J. Sean Lemoine, Esq.
Mr. Ethan Minshull, Esq. (Appearing via Zoom)
WICK PHILLIPS
3131 McKinney Avenue
Suite 100
Dallas, Texas 75204
(214) 692-6200
sean.lemoine@wickphillips.com

-and-

Mr. Casey S. Erick, Esq.
COWLES & THOMPSON
901 Main Street
Suite 3900
Dallas, Texas 75202
(214) 672-2000
cerick@cowlesthompson.com

-and-

Ms. Andrea Perez, Esq. (Appearing via Zoom)
KESSLER COLLINS, P.C.
2100 Ross Avenue
Suite 750
Dallas, Texas 75201
(214) 379-0722
ap@kesslercollins.com

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DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

APPEARANCES (continued)

FOR THE DEFENDANT FUNIMATION PRODUCTIONS:
Mr. John Volney, Esq.
LYNN PINKER COX & HURST, LLP
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
(214) 981-3839
jvolney@lynnllp.com

FOR THE DEFENDANT JAMIE MARCHI:
Mr. Sam Johnson, Esq.
JOHNSON SPARKS
7161 Bishop Road
Suite 220
Plano, Texas 75024
(972) 918-5274
sam@johnsonsparks.com

FOR THE VIDEOGRAPHER:
Mr. John Franks

ALSO PRESENT: (Appearing via Zoom)
Ms. Jamie Marchi
Mr. Ronald Toye
Ms. Monica Rial

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DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

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REQUESTED DOCUMENTS/INFORMATION

NO. DESCRIPTION PAGE

NONE .....

CERTIFIED QUESTIONS

NO. PAGE/LINE

NONE .....

*XXXX identifies redacted names in the transcript per confidentiality stipulation

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

THE VIDEOGRAPHER: And we're going on the record in the videotaped deposition of Mr. Victor Mignogna. Today's date is June 26th, 2019. The time is 10:05 a.m.

At this time, will counsel please state their appearances for the record, and then the court reporter will swear in the witness.

MR. BEARD: Ty Beard for the Plaintiff.

MR. ERICK: Casey Erick for Defendants Monica Rial, Ron Toye.

MR. LEMOINE: Sean Lemoine for the Defendants Monica Rial and Ron -- Ron Toye.

MR. VOLNEY: John Volney for Funimation.

MR. JOHNSON: Sam Johnson for Jamie Marchi.

MR. BEARD: Go ahead and announce.

MS. CHRISTIE: Carey Christie for Vic Mignogna.

MR. LEMOINE: And then we have appearing by Zoom, which is a teleconference, we have Ethan Minshull from Wick Phillips and Andrea Perez from Kessler Collins. And, also, Ms. Marchi and Mr. Toye, and I think Ms. Rial, are joining by Zoom.

And do you want to do the --

MR. BEARD: Yeah. We're on the record?

MR. LEMOINE: Yeah.

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DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

MR. BEARD: Okay. Counsel has agreed that the only people that will be watching this live stream are the parties and counsel, and that it will not be recorded or otherwise distributed without agreement of all the parties.

MR. ERICK: That's agreed.

MR. LEMOINE: That's correct.

MR. JOHNSON: That's agreed.

MR. LEMOINE: One other -- one other thing. This lady sitting in the black with the gray sweater hasn't introduced herself, has she?

MR. BEARD: No. She's Lisa Hansell, she's our witness consultant.

MR. LEMOINE: Okay. She's a jury consultant of some sort?

MR. BEARD: Witness, but, yeah, my -- my office.

MR. LEMOINE: All right. One other agreement, can we have an agreement that objection for one of the Defendants is an objection for all, so we don't jump all over each other?

MR. JOHNSON: Agreed.

MR. LEMOINE: All right. And I don't know if everybody wants to do consecutive deposition numbering so that it would be throughout the

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DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

depositions, since I suspect there will be a large number of them, but, Mr. Beard, that's up to you.

MR. BEARD: In other words, one objection that you guys -- that one person makes is deemed to be --

MR. LEMOINE: Oh, I'm -- I'm sorry.

MR. BEARD: -- made for all?

MR. LEMOINE: That -- that's an agreement for the Defendants, that way we don't have to keep objecting.

MR. BEARD: I was wondering what I was involved in.

MR. LEMOINE: The agreement, what I was asking everybody at the table, because I can't dictate this, is consecutive deposition numbering, meaning we start today at 1, and if we go to 42, and then tomorrow there's a new deposition, 1 through 42 stays set, you'll have them, you can use the 1 through 42, and then any new depositions would start at 43. That way, when you go to trial and you're playing deposition testimony, the 42nd deposition exhibit is the same in every deposition. Does that make sense?

MR. BEARD: No. But --

MR. JOHNSON: If I may jump in, he means consecutive exhibit numbering.

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MR. BEARD: Oh, sure, yeah, that's fine.
MR. LEMOINE: What am I saying?
MR. JOHNSON: You're saying consecutive deposition --
MS. CHRISTIE: Deposition.
MR. JOHNSON: -- numbering.
MR. BEARD: Yeah.
MR. LEMOINE: I got it.
MR. BEARD: Yeah, that's fine.
MR. LEMOINE: Okay. Any -- anything else we need to discuss? Read and sign, I assume?
MR. BEARD: No.
MR. LEMOINE: Okay.
THE REPORTER: You don't want to read and sign?
MR. BEARD: Oh, I'm sorry. Help me out here.
MR. LEMOINE: Do you want Mr. -- is it Mignogna?
THE WITNESS: Mignogna, yes, sir.
MR. LEMOINE: Very good. Mr. Mignogna to read his deposition and sign it when it's over?
MR. BEARD: Oh, yeah.
MR. LEMOINE: Okay.
MR. BEARD: Absolutely. I'm sorry, I was

--
MR. LEMOINE: Yeah, I thought that's --
MR. BEARD: I was -- I was a thousand miles away.
MR. LEMOINE: That's what I thought. All right. Are we otherwise ready?
(Oath administered.)
THE REPORTER: This will be taken under the Texas Rules of Civil Procedure?

VICTOR MIGNOGNA,

having been first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. LEMOINE:

Q. Would you state your name for the record.
A. Victor Joseph Mignogna.
Q. Mr. Mignogna, would you identify the woman with the black shawl and gray shirt. Who is she?
A. Her name is Lisa Hansell.
Q. And what does she do for a living?
A. For a living?
Q. Yeah. Do you know?
A. She does several things, but among other things, she does makeup work and production work.
Q. And when you say makeup work and production work, is that in some kind of --

A. For film and television.
Q. Okay. Is she -- to your knowledge, has she ever been a witness consultant?
A. I don't know anything about --
Q. As you sit here today, is she -- do you -- have you hired her to be your witness consultant?
A. I have not hired her.
MR. LEMOINE: Okay. Then I'm going to ask that Ms. Hansell be excluded from the deposition.
MR. BEARD: Counsel, I hired her. But that's fine, she can be excluded.
MR. LEMOINE: Okay.
(Ms. Hansell exits.)
Q. (BY MR. LEMOINE) Have you ever been deposed before, Mr. Mignogna?
A. No, sir.
Q. Have you ever had to give testimony in any capacity before?
A. Yes, sir.
Q. In what capacity?
A. I was a police officer for a time, and in my job capacity, I -- I would have to testify against defendants that I arrested and give testimony.
Q. And when were you a police officer?
A. A long time ago. Roughly '86, '87, in

Maryland.
Q. And how long were you a police -- and how long were you a police officer, a year?
A. Roughly two years, on and off.
Q. And when you -- when you say on and off, were you some kind of auxiliary police officer?
A. Well, no, I -- well, I was a -- I was a seasonal officer, went through a -- the - the necessary degree of training and sworn in, powers of arrest, etc.
Q. Were you allowed to carry a pistol?
A. Yes, sir. And -- I'm sorry.
Q. Go ahead.
A. And then at some point they realized that I had a background in film and television and they asked me to -- to start making PSAs and commercials for pedestrian-related, citizen-related videos to help educate the -- the -- the public. That's why I meant on and off. I -- I started doing the video stuff toward the end.
Q. When did you stop being a police officer?
A. It was just a couple of years, so, I guess, you know, roughly -- again, I -- I don't remember the years, specifically, but a couple of years.
Q. And why did you cease being a police officer?
A. It was never a career move, it was a -- it was

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something that I thought would be interesting to do right out of college. I mean, it wasn't something I intended to do for a long period of time.

Q. Were you terminated or did you voluntarily quit?

A. No, I voluntarily quit.

Q. Apart from your attorneys, have you talked to anybody in preparation for this deposition?

A. No.

Q. What have you done to prepare for this deposition?

A. Just spoken with my attorneys and prepared.

Q. Did you review any documents to refresh your recollection about any events that you might be discussing today?

A. No, sir.

Q. Are there any medications that you're on that would prevent you from testifying truthfully?

A. No, sir.

Q. Is there anything that you can think of that would prevent you from testifying truthfully today?

A. No, sir.

Q. What's your full name?

A. Victor Joseph Mignogna.

Q. How old are you?

A. Fifty-six.

Q. Do you ever go by any nicknames?

A. Vic.

Q. Is that it?

A. Yes.

Q. What about the Fuhrer, ever be -- ever go by the nickname the Fuhrer?

A. No.

Q. Have any --

MR. BEARD: Excuse me --

Q. (BY MR. LEMOINE) Are you aware of --

MR. BEARD: -- Counsel, could you say that louder?

MR. LEMOINE: The Fuhrer.

MR. BEARD: The Fuhrer?

MR. LEMOINE: Yeah.

MR. BEARD: As in Adolph Hitler?

MR. LEMOINE: I don't know.

MR. BEARD: Is that how it's spelled?

MR. LEMOINE: Yes.

MR. BEARD: Okay. Sorry.

Q. (BY MR. LEMOINE) Are you aware of there being any group of people out there in -- in -- in the world that refer to you as the Fuhrer?

A. Yes.

Q. And who refers you -- as you to the Fuhrer?

A. Many years ago, members of my fan club, the Risembool Rangers, thought that it would just be fun, since it was kind of a nickname of the fan club, that they were kind of Risembool -- that they were Rangers, and somebody made it up as a joke. I had nothing to do with it. It was short-lived. I didn't make it up, I didn't condone it, it was just a -- something some fan made up.

Q. Do you know if your mother ever referred to you as the Fuhrer?

A. Not to my knowledge.

Q. And when you say short-lived, short-lived like how long, few days, few weeks?

A. I don't even know. I haven't heard that reference in a very long time until you just said it.

Q. I take it that when the -- the Risembool Rangers started referring to you as the Fuhrer, you -- you understood the inappropriateness of something like that, correct?

A. I didn't really have any feeling about it.

Q. Well, can you associate for me any other human being that's been called the Fuhrer besides Adolph Hitler?

A. Not to my knowledge.

Q. All right. And so you would agree with me that it would be inappropriate for you to have a nickname or condone a nickname like the Fuhrer?

A. I never condoned it.

Q. Okay. And you would agree with me that would be in -- inappropriate for people to call you that, but you don't support that kind of nonsense, do you?

A. I don't fully understand.

Q. Sure.

A. Can you rephrase?

Q. If somebody called me the Fuhrer, I would tell them to stop immediately, because it's anti-Semitic and refers to a time in our history where terrible things were done to Jewish people. Do you -- do you have that same feeling?

A. Of course I do.

Q. Okay. So you would agree with me that if there were people out there calling you the Fuhrer, one of the things you would do would be to intervene to stop that?

A. I knew that they were fans who meant nothing by it. They're young people. And I didn't address it one way or the other, and it died off.

MR. LEMOINE: All right. I'll object as nonresponsive.

Q. (BY MR. LEMOINE) My question was not what you

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think the fans might believe, but if you agree, they would be --

A. I believe you asked me if they would -- if I told them to stop, and I said no. And my answer to that is, no, because they were fans and I knew they didn't mean anything by it. Their intentions were nothing more than playful, and so I didn't address it and it died off.

Q. Does the Risembool Rangers, do they have a definitions page somewhere?

A. I don't know.

Q. That's not something you have anything to do with?

A. No, sir.

Q. Is there any adult that monitors this --

A. Yes.

Q. -- Risembool Rangers page?

A. Sorry. Sorry. Not supposed to overlap. I apologize.

Yes.

Q. And who's that adult?

A. I don't -- I don't specifically know all their names, but we have moderators. We've always had moderators of legal age to make sure that any of the, like, forums and -- and places where the fans would

gather to chat, were safe places where -- where there wasn't any inappropriate discussions or challenges or bullying.

Q. Okay. And so do you know who any of these moderators are?

A. I know some -- they've changed over the years, because, again, they're volunteers, they're fans who just offered to help.

Q. And who screens them to make sure they're of legal age?

A. I'm sorry?

Q. Who screens them to make sure they're of legal age?

A. The other moderators who are of legal age.

Q. Who screens that moderator?

A. I'm sure at some point in time I -- I probably had spoken to someone who I knew was of legal age.

Q. As you sit here today, can you identify one person?

A. I'm sorry?

Q. As you sit here today, can you identify one person who is of legal age that is a moderator on the Risembool Rangers page?

A. Alyssa Fluty.

Q. And how old is she?

A. I don't know her birthday.

Q. How do you know she's of age?

A. Because she's clearly of age.

Q. All right. How many hours does miss --

A. She's out of college, she has a job, she's clearly of age.

Q. How much time does she devote to the --

A. I have no idea, sir.

Q. -- moderator?

A. I'm sorry.

Q. Where do you currently live?

A. Grapevine, Texas.

Q. And how long have you lived in Grapevine?

A. Since late December of last year.

Q. And where did you live prior to that?

A. I went back and forth between Los Angeles and Houston.

Q. Are you married?

A. No, sir.

Q. Have you ever been married?

A. Yes, sir.

Q. How long were you married?

A. Six -- a little over six years.

Q. From when to when?

A. '95 to 2000, mid 2000.

Q. Do you have any children?

A. No, sir.

Q. What's the highest level of formal education you've ever obtained?

A. I have a bachelor's degree in science.

Q. Where did you get that?

A. Arts and science. From Liberty University.

Q. In Virginia?

A. Yes, sir.

Q. When did you graduate?

A. '86.

Q. And after you left Liberty, that's when you became a police officer in Maryland?

And I know it's been a long time, so I'm not trying to --

A. I know. So sorry.

Q. I'm not trying to trap you on dates.

A. No, I -- I -- I know, I'm just trying to work it out. When I said on and off, if I may, I guess, if I --

Q. Sure. Go ahead.

A. -- may clarify.

As I mentioned, I was a seasonal officer. There are cities in Maryland that are vacation towns and they hire additional officers for -- for the -- for the

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seasons. And my senior year in college, I was hired. And then I went back to college so I wasn't there any more. And then after college, I went back and did it for another year and a half or so. That's what I meant by on and off.

Q. Okay. Did you teach at a school after you graduated Liberty University?

A. Yes, sir.

Q. What school did you teach at?

A. Trinity Christian Academy.

Q. Where's that located?

A. Jacksonville, Florida.

Q. What did you teach?

A. I taught English and speech.

Q. And how long did you teach there?

A. A year.

Q. And why did you leave?

A. Because, again, it was not a career move. It was not my intention to be a teacher. It was an opportunity that was offered to me right after college.

Q. Were you -- did you resign or were you terminated?

A. I actually don't even recall.

Q. Were there any allegations of inappropriate behavior between you --

A. Not to my knowledge.

Q. Let me get my question out.

A. Sorry.

Q. Were there any allegations of inappropriate behavior between you and any students at this school in Jacksonville that led to your resignation or termination?

A. Not to my knowledge.

Q. And you would agree with me that if you were terminated for inappropriate behavior or allegations of inappropriate behavior with children, that's something you'd remember?

A. Certainly. Of course it was 30 years ago.

Q. Okay. But even 30 years ago, if you were accused of inappropriate behavior with children at your first job after graduating the Christian school of Liberty University --

A. Uh-huh.

Q. -- that's something that would stick with you, isn't it?

A. Yes, sir.

Q. When did you first become involved in movies or theater or TV production?

A. Since I was very young.

Q. All right. When --

A. Thirteen, twelve, thirteen.

Q. When was your first paying job in the movie or --

A. I have no --

Q. -- TV production?

A. I have no recollection.

Q. How long would you say that you've been in the public spotlight?

A. Being in the public spotlight is kind of subjective, you know, like what one person would consider celebrity or whatever, I don't --

Q. Okay.

A. I -- I -- I couldn't answer that.

Q. That's fair. Let me -- let me -- let me do it this way. Do you consider yourself to be a celebrity?

A. No.

Q. Okay. Why not?

A. Because I don't.

Q. You've been in movies before?

A. Yes.

Q. You've been on TV shows?

A. Yes, sir.

Q. You have voice acted for, what, hundreds of Japanese anime films?

A. Yes, sir.

Q. You go to conventions where thousands of people show up?

A. Yes, sir.

Q. You've taken -- over the course of your, let's say last 20 years, you've probably taken pictures with over 10,000 people; is that fair?

A. I don't know an exact number.

Q. Well, I mean, is it more or less than 10,000?

A. I couldn't answer. I couldn't tell you.

Q. Well, how many people --

A. I haven't kept count. Sorry.

Q. Well, do you think it's more than 100?

A. Sure.

Q. All right. What's the last convention you went to?

A. I was at an event last weekend in Dublin, Ireland.

Q. How many people did you take pictures with there?

A. I didn't count.

Q. More than 100?

A. Probably not.

Q. Do you consider yourself to be a celebrity in the American voice actor community?

A. I don't feel like it's for me to say whether

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I'm a celebrity or not.

Q. Okay. Anybody a more popular voice actor in the, I guess, American anime community than you?

A. I'm sorry, would you ask that again, please?

Q. Yeah. I mean -- all right. You're -- you're -- I know you're involved in cartoons, or something like that, so how would you describe what it is you do for a living?

A. I provide English voices for Japanese anime that is -- that is dubbed into English.

Q. Okay. And is there a -- is there a lingo that we can use in this deposition for that?

A. Voice actor.

Q. American voice actor?

A. Voice actor.

Q. Okay. All right. Is there anybody that you know of in the voice acting community that is more -- has more celebrity than you?

A. I've never really thought about it.

Q. So as you sit here today, you don't know if there's anybody that has more, what we call celebrity, than you?

A. No, I do not.

Q. I mean, is -- is your -- is your reputation as a voice actor, is that important to you?

A. Yes.

Q. Why?

A. My reputation, in general, is important to me.

MR. LEMOINE: Object as nonresponsive.

Q. (BY MR. LEMOINE) Is your reputation as a voice actor important to you?

A. Of course.

Q. Okay. Why?

A. Because it reflects on me as a person, it reflects on me as a professional in a field.

Q. And -- and do you feel like you have a positive reputation as a voice actor in your field?

A. I believe I do.

Q. And how long have you had that, what you would call, positive reputation?

A. Well, I've been a voice actor for almost 20 years, so I can only assume that since I've been hired repeatedly for, you know, over 20 years, that somebody must think I'm relatively good at what I do.

Q. And over the last 20 years, have you attended conventions or Japanese anime films?

A. Yes, sir.

Q. Is that a -- is that how -- part of how you make a living?

A. Sorry?

Q. Is that part of how you make a living?

A. Certainly.

Q. And I assume these conventions are open to the public?

A. Yes, sir.

Q. And lots of people come and watch or meet you at these conventions?

A. Yes, sir.

Q. What's the largest number of people that you think you've ever spoken to at one of these conventions?

A. I have no idea.

Q. More than 20?

A. Sure.

Q. More than 100?

A. Probably.

Q. More than 500?

A. That's the point at which I wouldn't -- I wouldn't be able to comment specifically.

Q. Are you usually in a room of the same size that we're in right now?

A. The sizes of the rooms vary.

Q. Are they bigger or smaller than the room we're in?

A. They vary.

Q. Well, on average, are they bigger or smaller

than this room?

A. They vary.

Q. Okay. What's the smallest?

A. I've been in rooms, large rooms, that had a small amount of people, I've been in small rooms that have had a larger number of people. I mean, they're -- they vary.

Q. Is your personal reputation important to you?

A. Yes, sir.

Q. Why is that? Why?

A. The same reason anyone's is important to them.

Q. Well, not anyone is suing my clients for defamation. You are, sir. So why is your reputation important to you?

A. Well, because it goes to credibility, it goes to the opportunity to continue to work and be hired.

Q. Anything else?

A. Nothing comes to mind at the time.

Q. If you think of something, feel free to jump back in. It's not a power --

A. Yes, sir.

Q. It's not a power test.

With regard to your credibility, how has whatever you think Mr. Toye has said, how has that hurt your credibility?

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A. Mr. Toye has made a large number of public assertions to which there is no evidence or proof. They're very negative, they're -- they're defamatory.

Q. Okay.

A. And -- sorry.

Q. No, you get to answer until you're done.

A. No, go ahead. I'm -- I apologize.

Q. So Mr. Toye has made allegations that you would consider to be uncredible?

A. Yes, sir.

Q. All right. And so if those aren't credible allegations, that really hasn't hurt your credibility, has it?

A. There's a matter of public perception that I think we can all agree is -- is pretty prevalent and powerful these days.

Q. I understand what public perception is. I'm trying to figure out whether or not somehow your credibility has been hurt by what Mr. Toye has said.

A. Yes, I believe it has.

Q. Okay. How?

A. By altering the perception of people that make decisions about my work and career.

Q. All right. And is Mr. Toye the only person that's had this negative impact on the perception of

people that hire in your line of work?

A. No, I don't believe so.

Q. Other than Ms. Rial and Ms. Marchi, anyone else that's done anything to hurt the -- your credibility in the voice acting industry?

A. I'm sure.

Q. Can you identify any of them, as you sit here right now?

A. No, sir, not -- not by name. Many of them are screen names, you know, on a computer, you don't know who they are, you don't know where they live, you know, you -- you can't know, really.

Q. You would agree with me that the allegations surrounding your alleged homophobia, anti-Semitism, and sexual harassment are being discussed publicly, correct?

A. They are being discussed publicly, yes.

Q. And because of that public discussion, that's hurting your credibility, isn't it?

A. Yes, sir.

Q. And it's not just Mr. Toye and Ms. Marchi and Ms. Rial that are discussing that; is that correct?

A. Yes, sir.

Q. Are you suing anybody else, as we sit here today?

A. No, sir.

Q. Have you sent retraction letters to anybody else?

A. No, sir.

Q. Would you agree with me that the damage to your personal reputation is also damaging to your fan base?

A. Possibly.

Q. Would you agree with me that if this litigation was resolved in one form or fashion, that that would be a benefit to your fan base?

A. Would you rephrase that, please?

Q. Yeah. If this litigation was resolved, that would -- that would help your fan base, wouldn't it?

A. I don't know.

Q. Well, for instance --

A. I've never been involved in anything like this. I don't really know what the outcome would be or how it would affect anything.

Q. Okay. How about this for an example: If the litigation was resolved today, your fan base could save their money and not donate to the GoFundMe campaign that's been set up for you. Would you agree with that?

A. I have nothing to do with that.

MR. LEMOINE: Objection, nonresponsive.

Q. (BY MR. LEMOINE) Would you agree with me that if this litigation got resolved, then your fan base

wouldn't have to donate to your GoFundMe campaign?

A. They don't have to donate. No one is compelling them to donate.

Q. And no one's asking them to donate?

A. I'm sorry?

Q. And no one's asking them to donate?

A. Not that I know of. I have nothing to do with that.

Q. Do you know how the money is spent?

A. No, sir.

Q. So who makes sure the money is actually spent for your benefit?

A. I didn't set it up. I don't know anything about it.

MR. LEMOINE: Objection, nonresponsive.

A. I don't know.

Q. (BY MR. LEMOINE) So you have a GoFundMe campaign out there in your name. Do you know how much money is in it?

A. No, sir.

Q. You have no clue?

A. No, sir.

Q. So somebody is raising money with your name and face on a GoFundMe page. Do you agree with that?

A. That's what I've been told, yes.

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Q. And you have no idea -- do you know who runs that account?

A. Do I know who funds the account?

Q. Runs the account.

A. Oh. I believe it was set up by a gentleman named Nick Rekieta.

Q. How do you spell Rekieta?

A. I don't know. R-E-K-E --

MR. BEARD: I-E.

A. -- E-I-T-A -- I-E -- I-E-T-A.

Q. (BY MR. LEMOINE) All right. Do you know Mr. Rekieta?

A. I'd never met him until, for the first time, a couple of weeks ago.

Q. Where did you meet him at?

A. I met him at an anime convention in Houston.

Q. Is he your attorney?

A. No, sir.

Q. Has he ever represented you?

A. No, sir.

Q. Have you ever communicated with Mr. Rekieta by email, text, any type of application on your phone?

A. Briefly.

Q. About what?

A. He wrote me back in, probably, February. I

didn't know who he was, it was unsolicited, and I did not reply. And then it was brought to my attention that there was a gentleman on the internet who was making videos and -- and being very supportive of -- of my situation. And when they told me his name, I went back into my email and looked up to see if that was the person that had contacted me, and it was. And so I sent him an email and thanked him for his support.

Q. Is that the only exchange that you-all had or have you-all had continuous email, text message?

A. Occasionally.

Q. Did you talk about this litigation?

A. Briefly.

Q. Do you know what his cell number is?

A. No, sir.

Q. Is it stored in your phone somewhere?

A. Yes, sir.

Q. When's the last time you got a text message from Mr. Rekieta?

A. I don't recall.

Q. Have you done anything to delete any communications off your, either email or phone, or other electronic devices, from Mr. Rekieta?

A. Well, I -- I have a routine of, once I finish a conversation with somebody, I delete it because I don't

want to have 600 text messages. So if you and I have a conversation about a particular thing, where are we going to lunch today, whatever, once that conversation is over, I delete it.

Q. All right. Have you ever done a factory reset on your phone?

A. No, sir.

Q. Do you ever take your phone and put a lightning cord in it -- well, strike that.

What kind of phone do you use?

A. iPhone.

Q. All right. Do you ever plug your iPhone into your laptop?

A. I have, yes.

Q. When's the last time you did that?

A. I don't recall. It's been a while, actually.

Q. Have you done anything to remove communications off your laptop?

A. No.

Q. All right. Do you have an iCloud account?

A. No -- wait.

Q. Just --

A. I -- I -- I -- I may, yes, actually.

Q. And do you know whether or not your phone backs up to your iCloud account?

A. I don't know.

Q. Do you have some type of administrator that would help you with that, that handles --

A. No.

Q. So Mr. Rekieta communicates with you in February of 2019, for the first time, and at some point you reach back out to him and you-all have a conversation.

Who came up with the idea of the GoFundMe campaign?

A. Mr. Rekieta.

Q. And what was the purpose of the GoFundMe campaign?

A. You'll have to ask Mr. Rekieta.

Q. What did Mr. Rekieta tell you the purpose of the GoFundMe campaign was?

A. He said that he believed that the people who supported my position wanted to help in any way they could. And he said he was going to provide them a way to do so, if they chose to.

Q. And you told him that was okay with you?

A. No. I did not give him permission. He had already done it.

Q. Okay. Did you -- did he ask for permission after he did it?

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A. No, sir.
Q. All right. You do realize that people have put hundreds -- over $100,000 into that GoFundMe account? Did you know that?
A. If -- if that's the number you're telling me, then I believe you. Voluntarily. I -- I believe. I don't think anyone's been compelled to do anything.
Q. Did you ask Mr. Rekieta to set up this GoFundMe campaign?
A. No, sir.
Q. It was a complete shock to you when it occurred?
A. Define complete shock.
Q. Well --
A. That sounds rather, you know --
Q. Well, how about this: How many GoFundMe campaigns have been set up for your benefit, without your knowledge, in your lifetime?
A. None that I'm aware of.
Q. So this is the first?
A. As far as I know.
Q. And Mr. Rekieta wasn't a friend of yours when it was set up, was he?
A. No, sir.
Q. All right. So would you agree with me that

that was kind of shocking, that a random individual that you don't know sets up a GoFundMe campaign?
A. It was unexpected.
Q. Did you ever bless him doing that?
A. No.
Q. Are you okay with the -- the GoFundMe account?
A. As a matter of fact, sir, I remember when he first told me that he had done it, I told him I -- I didn't -- I didn't really know how I felt about it, because I didn't want people -- you know, I didn't want people giving money to something. And that was the point at which he said what I just mentioned to you earlier, that he felt that there were a lot of people out there who felt that I was being treated unjustly and wanted to help.
Q. So this GoFundMe campaign, you don't have any idea how the money is being spent?
A. No, sir.
Q. Don't know who -- where the money is going?
A. No, sir.
Q. What happens to the money when this -- if there's any money left over after this litigation is over?
A. I -- I believe I was told at some point that if there was money, any money that was not spent, left

over, as you say, would go to a charity, a charitable cause.
Q. And who picked the charitable cause?
A. I don't remember.
Q. Does it strike you as odd that there's someone out there raising money in your name and you can't tell me how that money is being spent?
A. No, sir.
Q. Do you feel no responsibility to make sure --
A. No, sir.
Sorry.
MR. LEMOINE: Objection.
A. I apologize.
Q. (BY MR. LEMOINE) Thank you. So you feel no responsibility to the --
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) -- tens or thousands of people that are putting money into this GoFundMe campaign to make sure you know how the money is being spent?
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) Are you -- you struggling with that question?
A. No, sir. I'm --
Q. Are you going to answer it?

A. I'm responding to my --
MR. BEARD: You can answer the question, I'm sorry.
A. -- attorney's objection.
Q. (BY MR. LEMOINE) Oh. Unless he tells you not to answer it, you have to answer it.
A. Okay. Sorry. I didn't know how that worked.
Q. Yeah.
MR. BEARD: No, that's right.
A. Please repeat the question.
Q. (BY MR. LEMOINE) Sure. You feel no responsibility whatsoever to make sure that the money being put into a GoFundMe campaign for your benefit, how it's spent?
MR. BEARD: Same objection. Objection, form.
You can answer the question.
A. My understanding is that it's being spent for legal defense.
Q. (BY MR. LEMOINE) Okay.
A. And I trust what I've been told.
Q. All right. Where did you get the understanding that it's being spent for your legal defense?
A. What's the name of the GoFundMe? Do you know what it is?

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(Exhibit 11 marked.)

Q. (BY MR. LEMOINE) Sure. I'm going to show you what's been premarked as Exhibit 11. I will represent to you that Exhibit 11 is a screenshot of the GoFundMe campaign called Vic Kicks Back, that started on February 19th, 2019. Are you with me so far?

A. Yes, sir.

Q. Have you ever seen the GoFundMe page?

A. No, sir.

Q. This is the first time you've ever seen it?

A. I haven't followed it.

MR. LEMOINE: Objection, nonresponsive.

Q. (BY MR. LEMOINE) Is this the first time you've ever seen the GoFundMe page?

A. I don't recall if I've -- if I've looked at it before, but --

Q. So -- so why is it that you don't feel a desire to make sure that money that's being collected in your name is spent properly?

MR. BEARD: Objection, form.

A. Because I didn't start it.

Q. (BY MR. LEMOINE) Okay. So --

A. I didn't request it.

Q. -- if Mr. Rekieta is some kind of con artist, it's okay that he takes money from your fans because you

didn't start it?

MR. BEARD: Objection, form.

Q. (BY MR. LEMOINE) Fair point?

A. I have no knowledge of Mr. Rekieta being a con artist.

MR. LEMOINE: Objection, nonresponsive.

Q. (BY MR. LEMOINE) If Mr. Rekieta is a con artist and he is just taking money and doing whatever with it that is coming from your fans, not your problem?

MR. BEARD: Objection, form.

A. I have nothing to do with it.

Q. (BY MR. LEMOINE) Okay. So not your problem, right?

A. Correct.

Q. All right. Anybody else that you let use your face and your name to collect money from your fans, that you don't --

A. Not that I'm aware of. But I can assure you a lot of people are using -- have used my face and my name for their own purposes over the years and I don't have anything to do with them.

MR. LEMOINE: Object as nonresponsive. There's no question on the table.

Q. (BY MR. LEMOINE) Exhibit 11, the photo, that is a photo of you?

A. Yes, sir.

Q. All right. Do you know if that's a copyrighted photo?

A. No, sir.

Q. How old were you when that photo was taken? Got to be 30, right?

A. Sorry?

Q. You gotta be about 30 when this was taken?

A. Oh, you're very kind. That was taken in roughly 2008, 2009, I -- I -- I think, so I would have been mid-40s.

Q. As you sit here today, other -- other than your attorney, because I'm not allowed to get into those communications, has anybody else told you how money that is going into this GoFundMe campaign, how it's being spent?

A. No, sir.

Q. You've never seen any documents that -- that show how it's being distributed?

A. No, sir.

Q. As you sit here today, are you paying your attorneys to represent you?

A. I have not, as of this moment, paid them.

Q. Okay. Do you have an engagement agreement with them?

A. Yes.

Q. All right. And does the engagement agreement have where you pay an hourly rate, or is it a contingency fee agreement?

A. I don't recall.

Q. But as we sit here today, since -- since you've been involved with your current attorney, Mr. Beard, you've not paid him any money?

A. No, sir.

MR. BEARD: Counsel?

MR. LEMOINE: Yeah.

MR. BEARD: Can I interrupt? Off the record just a second.

MR. LEMOINE: Let's go off. Let's go off the record.

THE VIDEOGRAPHER: And we're going off the record, the time is 10:43.

(Break taken from 10:43 a.m. to 10:43 a.m.)

THE VIDEOGRAPHER: And we're back on the record at 10:43.

Q. (BY MR. LEMOINE) Real quick. If at any time you want to take a break, this is not a -- this is not the Bataan Death March.

A. Okay.

Q. So if you need to -- you need a break, as long

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as you answer whatever question is on the table --
A. Yes, sir.
Q. -- we'll take a break.
A. Yes, sir.
Q. All right. So I want to clarify something about your engagement with your attorney.
As we sit here today, you've not paid Mr. Beard any money?
A. No, sir.
Q. Okay. You had an attorney prior to Mr. Beard?
A. Yes.
Q. Who was that, if you remember?
A. Tonya.
MR. BEARD: Tonya something.
A. Tonya --
MR. BEARD: Meier?
A. Yes, Tonya Meier or Meiers.
Q. (BY MR. LEMOINE) Is she here in -- here in Dallas-Fort Worth?
A. Yes, sir. Yes, sir.
Q. And how long did she represent you?
A. A few weeks.
Q. And you paid her some money?
A. Yes, sir.
Q. Are there any other attorneys that you have

paid in association with the --
A. No, sir.
Q. So do you know of any people, any of your fans who have donated to this GoFundMe campaign?
A. No, sir.
Q. So when Mr. Rekieta came to you and said, I'm going to go set up the GoFundMe campaign, did you-all have a discussion of what the money would be used for?
A. He actually came to me and said, I've already set one up and I wanted to tell you.
Q. Okay. And so it wasn't something you approved ahead of time?
A. Correct.
Q. I mean, but -- but you're okay with it, right, you're okay with there being a GoFundMe campaign out there?
A. As I mentioned earlier, I -- I didn't have a really good feeling about it at first, and I expressed my concerns to Mr. Rekieta. And his response was, You have a lot of people out there that feel like you're being mistreated and they want to help, and it would mean a lot to them to be able to help you, and -- so I did not object.
Q. If anybody said that you approved Mr. Rekieta of setting up the GoFundMe campaign, that would be

incorrect?
A. I did not object to it.
Q. But I'm -- I'm not asking whether or not you objected. I understand that that's your position. I'm wondering if you approved him doing that.
A. Well, I guess what I mean to say is if -- he didn't ask me if it was okay if he did it. He just went ahead and did it, and let me know that he was doing it.
Q. Okay.
A. That he had done it.
(Exhibit 17 marked.)
Q. (BY MR. LEMOINE) All right. I'm going to show you what -- what has been marked -- premarked as Exhibit 17. Do you recall issuing a tweet on February 20th, 2019?
A. Not offhand, but --
Q. All right. I'm going to represent to you that Exhibit 17 is me pulling a screenshot of a tweet from you off of --
A. Uh-huh.
Q. -- your Twitter account for February 20, 2019. Do you recognize this?
A. Yes, sir.
Q. Does it look like a tweet that you issued?
A. Yes, sir.

Q. All right. I want to look on the left-hand side, second column down. It says: A friend expressed a desire to set up a GoFundMe for legal expenses. I approved his kind offer and am so grateful, but I am not managing it, nor will I personally receive any of it.
First question, the friend that expressed that desire is Nick Rekieta?
A. Yes, sir.
Q. And you would agree with me that when he expressed that desire, you approved it?
A. As I mentioned, he had already done it.
MR. LEMOINE: Objection, nonresponsive.
Q. (BY MR. LEMOINE) Does --
A. He did not express a desire to do it, he expressed that he had already done it.
Q. Okay. So when you tweeted this out to your people, you didn't say -- or on -- to all of your followers -- how many do you have?
A. Twitter followers?
Q. Twitter followers.
A. Roughly, 113,000.
Q. Okay. So when you -- when you made this tweet on February 20th, 2019 to all these people, you didn't say, Mr. Rekieta, or my friend, set this up without asking me, but -- but I was okay with it?

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A. No, sir, I did not.
Q. In fact, what you said was you gave it -- what it appears to be is you gave it your blessing, didn't you?
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) "I approved his kind offer and am so grateful," that's -- that's Nick -- that's Vic Mignogna blessing the GoFundMe?
A. Well, I -- I wanted to communicate that I was aware of it, and --
Q. And grateful, right?
A. And grateful.
Q. Yeah.
A. Certainly.
Q. And grateful.
A. Certainly.
Q. Because you-all are going to take that money, and you-all are going to sue some women into the dirt, aren't you, Mr. Mignogna?
MR. BEARD: Objection, form.
A. I'm sorry, say that again.
Q. (BY MR. LEMOINE) You-all are going to take that money and you're going to grind some women down into the dirt with this lawsuit?
MR. BEARD: Objection, form.

Q. (BY MR. LEMOINE) That's what you were going to do?
A. No, sir.
Q. That's not what happened?
A. No, sir.
Q. I mean, where has the money been spent?
MR. BEARD: Objection, form.
A. You -- I don't know. As I mentioned in an early -- to an earlier question.
Q. (BY MR. LEMOINE) You've sued Mrs. -- you've sued Mrs. Rial?
A. Yes, sir.
Q. You've sued Ms. Marchi?
A. Yes, sir.
Q. Hadn't sued anybody else, right?
A. Mr. Toye.
Q. Mr. Toye.
A. Not yet, in answer to your question, anybody else.
Q. Are there other people you plan on suing?
A. Possibly.
Q. Are there other people out there that have damaged your reputation that I should know about?
A. Possibly.
Q. I mean, did they do more damage to your

reputation than my clients?
A. I don't think so.
Q. What was the money going to be used for?
MR. BEARD: Objection, form.
A. What was this money going to be used for?
Q. (BY MR. LEMOINE) Yeah.
A. Well, I would encourage you to read it yourself.
MR. LEMOINE: Object as nonresponsive.
A. I will read it --
MR. BEARD: The witness answered the question.
A. I will read it for you, sir. Oh, no, here.
The fund is set up for Vic's legal defenses.
And as you know, as well, anything that was left over was told, very clearly, that it would be donated to charity.
Q. (BY MR. LEMOINE) Okay.
A. If this all ended tomorrow, the lion's share of what -- of this money would go to charity, which, I'm -- I assume you would approve of.
MR. LEMOINE: So object as nonresponsive.
Q. (BY MR. LEMOINE) My first question is, so the money in -- according to the GoFundMe page, is for your

defenses, correct?
A. That's my understanding.
Q. Are you being sued by anybody right now?
A. No, sir.
Q. So what is the money defending against?
A. That seems like a semantic to me. I think we both know what it's for. It's -- it's --
Q. Oh, yes, we do.
A. It's for the lawsuit itself.
Q. That's right, it's for you to sue two women that have accused you of sexual harassment --
MR. BEARD: Objection.
A. No, sir.
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) Oh, it's not -- the money's not for you -- for -- not to be used to help you sue two women that have accused you of sexual harassment?
A. The money is -- is to be used for me to seek justice for defamation of my reputation.
Q. Are you aware of any other GoFundMe campaign in the entire United States where a man accused of sexual harassment gets money to go sue his accusers?
A. No, sir.
Q. I mean, you're a unicorn, aren't you?
MR. BEARD: I'm sorry, could you say that

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again?
A. What do you mean?
Q. (BY MR. LEMOINE) I mean, you're literally the only male in the entire United States accused of sexual harassment who solicited money not to keep --
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) -- himself out of jail, but to go sue the harassers. Do you realize how unique you are?
MR. BEARD: Objection, form.
A. Am I?
Q. (BY MR. LEMOINE) Do you realize it?
A. No, sir, I don't.
Q. Okay. I mean, you're --
A. I didn't ask for any of this, sir.
MR. BEARD: Okay. Let's take a break. He's answered the question.
THE VIDEOGRAPHER: And we're going off the record at 10:52.
(Break taken from 10:52 a.m. to 11:00 a.m.)
THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 2. The time is 11:00 a.m.
Q. (BY MR. LEMOINE) Mr. Mignogna, I'd like you to pull Exhibit 17 back out, and we'll talk about it a

little bit more. Left-hand side of the page, top column, there's a discussion there about public and private apologies.
What are the private apologies that you made?
A. Shortly after Monica publicly stated that I had done something that upset or offended her in some way. I had been friends, at least I considered us friends for a very long time, and so I wrote Monica an email, basically saying I -- I am mortified if I've done something somewhere in the past to upset or offend you, but I -- would you please tell me what it is because I -- I didn't know in -- what she was referring to in her tweets.
Q. Is that the only person you privately apologized to?
A. Yes, sir.
Q. Okay. And so if I understand this correctly, Ms. Rial publicly made statements about you that reflected negatively upon you?
A. Yes, sir.
Q. Did they describe why she felt negatively about you?
A. The first several -- for the first bit of time, I can't tell you exactly how much -- how much time were

rather vague, and that was when I wrote her. As I said, we'd been friends, my understanding, for 20 years.
Q. Okay. The public apologies, what would those be?
A. I -- I put out a tweet at some point that just basically said, I am extremely sorry for any unintended -- certainly unintended offense or, you know, anything that has hurt or offended anyone. Certainly never my intention. And I also apologized publicly at an event.
Q. And -- and what -- what did you think you were apologizing for?
A. Inadvertently offending them.
Q. And when you say inadvertently offending, you're talking about giving hugs or kisses, and things like that, people that didn't want it?
A. Whatever it was that -- that people had a problem with.
Q. Like, now, were you also referring to instances -- the various instances in your hotel room where it was just you and a woman?
A. No, sir.
Q. Was that a part of it? So the public and private apologies didn't apply to that?
A. I'm sorry, say that again, please.
Q. You know, as we sit here today, that a number

of people have accused you of inappropriate behavior in your hotel room at these various conventions. Do you agree with that?
A. No, sir.
Q. You don't think that that's been -- you've been accused publicly of inappropriate conduct in your hotel room?
A. You said a number of people. I'm not aware of a number of people accusing me of that.
Q. So you're quibbling over the word "a number of people"?
A. Yes, sir, I am.
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) Okay. How many?
A. I don't know. Do you?
Q. Well, how do you know it's not a number?
MR. BEARD: Objection, form.
A. I didn't say it wasn't a number.
Q. (BY MR. LEMOINE) All right. Let me strike that. Let me start this one over.
How many people do you know of that have publicly accused you of inappropriate conduct in your hotel room?
A. I don't know.
Q. More than one?

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A. Yes.
Q. More than five?
A. I don't believe so, but I don't -- I don't --
Q. Somewhere between one and five?
A. Possibly.
Q. And you don't know who those people are that have accused you of this?
A. I certainly know some of them.
Q. And all false, right?
A. I'm sorry?
Q. And all false?
A. Anything that happened was consensual.
Q. Okay. Exhibit 17, left-hand side of the page, second column, talks about if there's any surplus, that will go to the Salvation Army Dallas Domestic Violence and Abuse Shelters.
Whose idea was that?
A. I don't recall, actually.
Q. But it wasn't yours?
A. No, sir.
Q. Have you ever donated to the Salvation Army Dallas Domestic Violence and Abuse Shelters?
A. No, sir.
Q. Have you ever donated to any domestic abuse shelters?

A. No, sir.
Q. Have you ever donated to the Me Too Movement?
A. No, sir.
Q. Ever donated to any organization designed to stop sexual harassment?
A. No, sir.
Q. Have you ever been arrested?
A. No, sir.
Q. And this is your first lawsuit ever?
A. Yes, sir.
Q. In this lawsuit, there's --
A. Does a divorce count? I guess not, does it?
Q. Kind of, but -- but I won't hold you to that.
A. Okay.
Q. Did you do anything to look for documents to produce in this lawsuit?
A. I'm sorry?
Q. Did you do anything to look for documents to produce in this lawsuit?
A. Can you -- can you --
Q. Let me -- let me --
A. -- clarify?
Q. In -- in most lawsuits, there's a process where documents are requested from inside. Your attorney has requested documents from my clients, we've requested

them from you.
A. Uh-huh.
Q. Are you with me so far?
A. Yes, sir.
Q. All right. Have you done anything to pull any documents together for this lawsuit?
A. I have provided everything to Mr. Beard that -- that was relevant, that --
Q. Okay. So let me -- let me break that down a little bit. When you say provided to him, in what form did you provide it? Did you give him your phone, give him your computer?
A. I forwarded -- I -- I guess, I forwarded emails or -- or --
MR. BEARD: Don't answer that. I'm going to object to privileged -- to privilege.
MR. LEMOINE: Okay.
MR. BEARD: Don't answer.
Q. (BY MR. LEMOINE) Did anyone assist you in selecting information that you forwarded to your client [sic]?
A. Not to my knowledge.
Q. Did anybody provide you documents to provide to your attorneys?
A. Not to my -- no, sir.

Q. Where did you look for information; file folders, computer, phone? Where did you look?
A. Well, I -- I didn't have a great deal, because this has not been -- I -- it wasn't any kind of an issue. When it came up, the only information that I really had were any emails or -- or documentation online, mostly.
Q. Okay. So let me see if I can narrow this down.
A. Stuff that might have been sent to me anonymously.
Q. Do you -- did you have any type of computer expert look at your phone or laptop?
A. No, sir.
Q. Did you give your attorneys or anybody else access to your phone or laptop?
A. No, sir.
MR. BEARD: That's fine.
Q. (BY MR. LEMOINE) Were you given what are called requests for production, it's an actual list of requests for documents and it specifies what we're looking for?
A. I believe my attorney was.
Q. Was that provided to you, do you know?
A. I believe he told me about it.
Q. Okay. I don't want to -- I can't get into

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that. How did you --

MR. BEARD: Off the record real quick.

MR. LEMOINE: No, I don't want to go -- I don't -- I don't like that. If you have a -- if you have a question, we can --

MR. BEARD: Works for me just fine. I don't think you propounded requests for production. I think -- is that right?

MS. CHRISTIE: No.

MR. ERICK: Yeah, well, just in the context of the deposition.

MR. BEARD: Subpoena duces tecum is all we got.

MS. CHRISTIE: Just a subpoena duces tecum.

MR. LEMOINE: Oh, my apologies.

MR. BEARD: Accepted.

Q. (BY MR. LEMOINE) So any -- any documents that have been provided to your attorney were provided by you. Did you have assistance pulling documents and providing them to the attorneys?

A. Not to my knowledge.

Q. There were a number of folders produced for -- to -- by your attorneys, one of them is called Fan Club Discovery, and it's like a little icon folder.

A. Okay.

Q. Did you put that together?

A. No, sir.

Q. Do you know how it would have gotten to your attorneys?

A. No, sir.

Q. Do you know a woman named Lauren Kocich, K-O-C-I-C-H?

A. Yes.

Q. And who is that?

A. She is one of the moderators of the Risembool Rangers fan club.

Q. And how old is she?

A. If I had to guess -- I don't know. But if I had to guess, probably mid-20s.

Q. Any idea why she would be producing documents or why we even would be getting documents with her name on it?

A. No.

Q. Are you familiar with a screen name or email macwarrior_m@msn.com?

A. No, sir.

Q. What about chebedragonessa47?

A. It's fun to say, isn't it?

Q. Do you know who that is?

A. No, sir.

Q. amandalynnmartin@yahoo.com?

A. No, sir.

Q. What about Jenna Gentry?

A. No, sir.

Q. Do you know who Martin Palmer is?

A. No, sir.

Q. How about a Christian Echols, E-C-H-O-L-S?

A. No, sir.

Q. Do you have any text messages with this -- with this Ms. Rial?

A. No, sir.

Q. None at all?

A. No, sir.

Q. And, certainly, if you don't have any text messages, then no one could be reporting that you were showing text messages from Mrs. Rial at conventions?

A. I'm sorry, say that again.

Q. Well, I'm -- oh, let me see if I do it this way. I heard a rumor that you've been going to conventions and showing people text messages supposedly from Monica Rial; is that true?

A. Not to my knowledge.

Q. Okay. Are you familiar with a website called Kiwi Farms?

A. I've heard of it.

Q. And do you know what it is?

A. Not -- I think it's some kind of an information gathering website. I've never been there.

Q. How did you -- when did you first learn of it?

A. Just during this -- during this incident, over the course of this incident.

Q. And how did -- I mean, when you say incident, you're talking about the -- kind of the online eruption of --

A. Yes, sir.

Q. -- allegations against you?

A. Yes, sir.

Q. And who introduced you to Kiwi Farms, or how did you learn about it?

A. I don't even remember.

Q. Do you know what goes on in -- at Kiwi Farms?

A. No, sir.

Q. So what is it you know about Kiwi Farms?

A. As I mentioned earlier, it -- it's some sort of an information gathering website. That's about all I know.

Q. Do you know what doxing is, D-O-X-I-N-G?

A. I've heard that word, yes.

Q. What's -- what does that -- what does it mean to you?

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A. Well, my understanding of it is that -- that it is the public publication or releasing of private information about someone. I think that's -- that's my understanding of it.

Q. Do you know if Kiwi Farms has anything to do with doxing any witnesses in this lawsuit?

A. No, sir.

Q. That's certainly not something you would support, is it?

A. No, sir.

Q. You -- you don't want witnesses', that are going to testify in this case, public information shared on the internet, do you?

A. I don't think public information -- or I don't think that kind of information should be shared publicly, no.

Q. Are you aware of anyone trying to get Kiwi Farms to identify witnesses and disclose their information?

A. No, sir.

(Exhibit 10 marked.)

Q. (BY MR. LEMOINE) Let me show you what we're going to mark as Exhibit 10. I'll represent to you that Ki -- that Exhibit 10 is a printout of Kiwi Farms and, in particular, threads in the bottom left-hand corner.

And what I want to do is take a look at page 10 -- I'm sorry, page 2, at the beginning.

A. Okay.

Q. Page 2, there's a number of names, including Mr. Toye, Mrs. Rial.

MR. BEARD: Page 10?

Q. (BY MR. LEMOINE) Pardon --

A. Page 2?

Q. Page 2.

MR. BEARD: Page 2. Okay.

A. Oh. They're -- are they printed on both sides?

Q. (BY MR. LEMOINE) Printed on the backsides.

A. Oh, okay.

Q. And if you look in the bottom -- bottom corner, you see that Exhibit 10, page 2, it's called a Bates label, at the very bottom of the document?

A. Down -- down here?

Q. Yeah. That's how I'll -- I'll direct you to pages.

A. Okay.

Q. Okay. So first time you've ever seen this web page?

A. Absolutely.

Q. Know anybody that -- that has anything to do with Kiwi Farms?

A. No.

Q. Any idea why these particular individuals might be on this page?

A. No.

Q. Do you know any individuals identified on page 2?

A. Are you talking about these pictures?

Q. Yes.

A. Certainly, I know Jamie. I know who Daman Mills is, I know who Amanda Winn Lee is, I know who Monica Rial is, Ron Toye, Chris Sabat, Sean Schemmel, Adam Sheehan, Jamie McGonnigal. They're all members of the -- of the industry.

Q. And no idea why they might be on this page that says "Doxemon," at the top, "Gotta catch 'em all"?

A. You'd have to ask the people that produced this. I don't -- I didn't do it. I -- I've -- I've never seen this before.

Q. And you understand that there are people who have accused you of inappropriate acts that have not disclosed their names, you're aware of that?

A. Yes.

Q. And -- and would you agree with me that you -- because they want to maintain their privacy, you would not want those names disclosed publicly?

A. I believe that someone who makes accusations publicly, especially with the intention of -- of destroying someone's reputation or job, at least should be identified. I don't believe somebody should have the power to destroy someone and remain safely anonymous.

Q. Okay. So if women come forward and accuse you of -- and are willing to testify, you want that public -- their identities publicly disclosed, fair?

MR. BEARD: Objection, form.

A. I would expect as much public disclosure of them as they have of me.

Q. (BY MR. LEMOINE) What about women who have not publicly accused you of anything anonymously, should they -- their names be disclosed?

A. Say that again, please, I'm sorry.

Q. Sure. What if there are women out there who have never publicly accused you of doing anything inappropriate, but are willing to testify in this case, are -- should their identities be disclosed to the public?

A. No, I don't believe so.

Q. Are you aware of anyone involved in this lawsuit receiving death threats?

A. No, sir.

Q. Have you received any death threats?

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A. No, sir.
Q. And you certainly don't want anyone receiving death threats?
A. Absolutely not.
Q. Okay. Do you think you're a pretty good judge of character of people?
A. Apparently not. I thought I was.
Q. And when did -- when did you start to doubt your ability to judge people's character?
A. When people that I have known for many, many years, who have treated me publicly, privately to my face, in dozens of settings, as friends, and then spent the last five months trying to ruin my career and reputation.
Q. Okay. So besides the Defendants in this case, is there anybody else that you would put in that bucket of trying to ruin your career?
A. Oh, sure.
Q. Who -- how about this: I'll go through some names.
Do you know who Michele Specht is?
A. Sure.
Q. Your former fiancee, correct?
A. Yes, sir.
Q. Is she a truthful person?

A. Yes, sir, to a degree.
Q. Any reason why she would make up things about you that you can think of?
A. You'd have to ask her that. I -- I'm not going to speak for her.
Q. I'm not asking you to speak for her. I'm asking you --
A. Do I -- you asked me if I thought she would do that, and I said you'll have to ask her.
Q. What about Stan Dahlin, do you know who that is?
A. Yes, sir.
Q. Who is he?
A. He ran a number of anime conventions.
Q. Truthful person?
A. As far as I know.
Q. Got any ax to grind with you, that you're aware of?
A. Not as far as I know.
Q. All right. Do you know who Tammi Denbow is?
A. No.
Q. You never heard of Tammi Denbow?
A. No.
Q. D-E-N-B-O-W?
A. No.

Q. Okay. What about Chuck Huber, do you know who that is?
A. Sure.
Q. Who is that?
A. He is a fellow voice actor.
Q. Is he a friend of yours?
A. I would consider him so.
Q. Does he have some kind of talent agency company?
A. I don't -- does he? I don't -- I don't know if he does.
Q. Has he ever represented you in any capacity?
A. No, sir. Represented me in what way?
Q. In any way.
A. Not that I'm aware of. No, not that I -- nothing comes to mind.
Q. Have you ever discussed this lawsuit with Mr. Huber?
A. Sure. He's a friend. I consider him a friend.
Q. Did you email and text about it?
A. Possibly. Definitely, you know, phone conversation.
Q. What did you-all talk about?
A. When?
Q. What.

A. I'm sorry. Just about the -- the online storm, and then when Jamie and Monica started posting things publicly, we spoke about that.
Q. And how long have you and Mr. Huber been friends?
A. I -- I don't -- maybe -- I don't know, maybe 10 or 12 years, I -- I don't --
Q. Truthful guy?
A. As far as I know.
Q. How about Chris Slatosch, S-L-A-T-O-S -- T-O-S-C-H?
A. I don't really know him that well. He run -- he ran a convention here in Dallas that I attended.
Q. Is that Kameha Con?
A. Yes, sir.
Q. Did you email or text with Mr. Slatosch?
A. Yes, sir.
Q. What about?
A. What about?
Q. Yeah.
A. He invited me to his event last fall. I was actually the first guest that he announced for his Kameha Con this year. And -- and then when -- when this eruption took place, shortly after it took place, Mr. Slatosch called me and told me that he had been getting

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pressure from Monica and Chris Sabat to dump me as a guest. And they made threats and -- and -- and put pressure on him, and so he told me that he had no choice but to cancel my appearance. And then I did not speak with him for quite some time, like two or three months, at least.

Q. And did you end up going to Kameha Con?

A. I did. I spoke with him two or three months later, after that hiatus, as I mentioned, and -- and he told me that he didn't -- he didn't really see any reason -- he -- he -- he didn't feel good about canceling me, that he felt that there were people that wanted me there and that, you know, barring any -- you know, anything substantial, that he wanted to have me back. And so I was very excited about that.

And he -- he -- my understanding, Sean, is that he called or communicated with Monica and Chris Sabat that he was going to re-invite me, and --

Q. Did you get to go?

A. And -- and -- and then they expressed more pressure and -- toward him not to have me. He -- and he went back and forth, vacillated on it for, I don't know, a couple of weeks, and then -- we did have a contract as well.

Q. And what do you mean a contract?

A. A contract that I was to attend that event.

Q. And you ended up going to the event?

A. Yes, sir, I did.

Q. Okay. Do you know a woman named Michelle McConnell Blankenship?

A. Not specifically by name.

Q. Okay. What about Lynn Hunt?

A. No, sir.

Q. Whitney Robinson Falba?

A. No, sir.

Q. Greg Ayres?

A. Sure. Greg's a voice actor, been a voice actor for years with me.

Q. Truthful, as far as you know?

A. (Witness nods.)

Q. No?

A. I -- I -- that's problematic.

Q. Okay. So -- so --

A. Greg has never really liked me much.

Q. Okay.

A. And I've -- and I've known that. He's spoken negatively about me to fans, and publicly, for many years.

Q. And what's he said publicly that was negative about you?

A. Oh, you know, Greg is gay and he -- he thinks that I am somehow against homosexuals, or something like that. I'm conservative, Greg is not, and he's very vocal about -- he was, for many years, that he didn't like me much.

Q. Okay. What about Donald Schultz?

A. Don Schultz, don't know that name.

Q. Chris Sabat?

A. Sure.

Q. Who is he?

A. Chris is a voice actor, has been a voice actor as long as I've been voice acting.

Q. Truthful guy, as far as you know?

A. No, sir.

Q. Okay. So what -- do you and Mr. Sabat have some kind of issue?

A. Oh, no. See, that's the unfortunate part. Mr. Sabat has looked me in the face, as long as I've known him and been friend -- and acted like friends, pretended to be supportive, told me that he was, you know, with me and -- and for me, and then over the course of this storm, it has come to my attention from different people, that he has, as long as they have known him, spoken disparagingly about me, made accusations behind my back and not been a friend at all.

So, as I mentioned, apparently I don't have the greatest luck when it comes to judging people's friendship.

Q. And who -- who told you that Mr. Sabat was speaking -- had been speaking negatively about you?

A. Several people.

Q. And who are they?

A. Chuck Huber, for one.

Q. Anybody else? If you -- if you -- if it comes to you, that's fine.

A. Yeah, I'm -- yeah, I'm sorry, I can't.

Q. How about Faisal Ahmed?

A. Faisal works with conventions.

Q. How long have you known him?

A. I know who he is because, you know, in your interactions going to a convention, you interact with somebody for a weekend who's running the show or who's in charge of the show in some way, but I don't really know him, he doesn't know me.

Q. Jim Gogal, do you know that name?

A. No, sir.

Q. All right. Adam Sheehan, do you know that name?

A. Yes. Adam used to work at Funimation.

Q. Truthful, as far as you know?

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A. I don't know him well enough to be able to make that judgment.

Q. Okay. Emmett Plant, do you know that person?

A. No, sir.

Q. Neysha Perry?

A. No, sir.

Q. Dayna Price, do you know that name?

A. No, sir.

Q. Todd Haberkorn?

A. Sure.

Q. Who is he?

A. Todd is a voice actor I've known for a while, a long time.

Q. Do you consider him a friend?

A. Yes.

Q. Consider him truthful?

A. He has his moments.

Q. Any ax he has to grind with you, that you're aware of?

A. Apart from -- honestly, apart from just the -- the normal kind of rivalry, competitive rivalry, I -- I will even tell you I -- you know, I've -- I've made jokes and, you know, things at Mr. Haberkorn's expense that I have apologized to him for. We have a -- a long history of friendship and conflict, and friendship and

conflict, and friendship and conflict.

Q. Kaylan Saucedo --

A. No.

Q. -- do you know that name?

A. Well, I -- I -- I -- I've heard the name. I -- I mean, I've heard the name because I -- I know that she's been part of this Twitter online situation.

Q. But she's not somebody you know?

A. No, sir. I wouldn't -- I wouldn't know her if she walked up to me right now.

Q. Janna Bruss?

A. No.

Q. Tara Sands?

A. No.

Q. Jessie Pridemore?

A. Oh, wait. Janna Bruss is married to Jerry Jewel. Yes, I know who Janna is, but I have not interacted with her in years.

Q. Do you know who Jessie Pridemore is?

A. I've heard the name.

Q. But you've -- have you ever met her?

A. I'm -- I've met her. I'm sure I've met her. She attended a lot of conventions, and I'm sure I've met her over the course of time. I've met an awful lot of people.

Q. How about Kara Edwards, do you know who that is?

A. Sure. She is a voice actress.

Q. All right. Is she truthful, as far as you know?

A. Depends on what she says.

Q. Well, as you sit here today, have you known any instances where Mrs. Edwards has lied?

A. My understanding is that she has recounted interaction between us inaccurately, that I would take issue with.

Q. Okay. Do you know what -- how do you know that? Did somebody tell you that?

A. I -- I assumed that, because there was an article written that quoted an anonymous source, and I -- just from reading this -- the account, I deduced that it was Kara.

Q. How about James Prager?

A. No, sir.

MR. BEARD: I want to be sure that's on the transcript.

MR. LEMOINE: Let's go off -- let's go off the record.

THE VIDEOGRAPHER: We're off the record at 11:29.

(Break taken from 11:29 a.m. to 12:54 p.m.)

THE VIDEOGRAPHER: And we are back on the record for the beginning of disc number 3. The time is 12:54.

Q. (BY MR. LEMOINE) Has Chuck Huber ever been authorized by you, or to your knowledge, to try and settle this lawsuit?

A. Authorized?

Q. Yes.

A. Define authorized, if you would, please.

Q. Did you tell Mr. Huber, Go settle this lawsuit for me?

A. No.

Q. Okay. Have you ever been diagnosed as a sex addict?

A. No.

Q. Have you ever received treatment for -- as a sex addict?

A. No.

Q. Is there any -- anyone ever told you that they thought you were a sex addict?

A. Not to my knowledge.

(Exhibit 12 marked.)

Q. (BY MR. LEMOINE) I'm going to show you what I've premarked as Exhibit 12.

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A. Okay.
Q. I will represent to you that is an email that was sent to Ms. Rial in March of 2013 by a person identifying themselves as Chuck Huber.
First question, looking at the first page of Exhibit 12. Do you recognize fireflyworks@gmail.com, is that an email you're familiar with?
A. Yes, sir.
Q. And whose email is that?
A. Chuck Huber's.
Q. All right. If you would, using the Bates label at the bottom, if you would turn to page 3 of Exhibit 12.
A. Uh-huh.
Q. First full email in the middle of the page.
A. Yes, sir.
Q. Appears to be from Chuck Huber on March 6, 2019, and then it says from Vic Mignogna. My name is Vic Mignogna and I'm a -- a sex addict.
Any idea why Mr. Huber would be emailing something like that to Monica Rial?
A. You'd have to ask Mr. Huber.
Q. All right. Certainly nothing that you were authorized --
A. No, sir.

Q. -- that you authorized him to do?
A. He wrote this.
Q. Have you ever seen this document before?
A. Yeah.
Q. When?
A. I -- I don't remember. He was -- he considers himself a friend of many of the parties involved, and apparently he wanted to try to see if he could help, and he crafted this. I didn't authorize any of it.
Q. And so did he email it to you or just tell you about it?
A. I -- I don't remember.
Q. And do you have a policy of deleting emails the same as you do regarding deleting texts?
A. Well, I get a lot of emails, sir.
MR. LEMOINE: Objection, nonresponsive.
Q. (BY MR. LEMOINE) Do you have a policy of deleting emails the same as you do of deleting texts?
A. Once I read them, they go into an old mail folder, but I don't, like, permanently delete them, no.
Q. (BY MR. LEMOINE) Okay. So if Mr. Huber sent you this email, it would be in your -- in some folder --
A. Yes, sir, I suppose so.
Q. And just -- I know that this is your first litigation so just -- so you know, there's a concept in

litigation called spoliation.
A. I'm sorry, what is it called?
Q. There's a concept called spoliation.
A. Spoliation?
Q. S-P-O-I-L-A-T-I-O-N [sic].
A. Okay.
Q. As in to spoil something.
A. Oh, okay.
Q. And -- and one of the things with regard to spoliation is that when litigation starts, you shouldn't delete relevant information. Do you follow me so far?
A. Sure.
Q. So, for instance, you shouldn't do anything to delete emails off your computer --
A. Of course.
Q. -- or phone, things like that. You understand?
A. Yes, sir.
Q. All right. Thank you.
Okay. So very clear in your mind that Mr. Huber was not authorized to send this email saying that Vic Mignogna is a sex addict?
A. I didn't -- I did not consult with him or agree to any of this. He wrote this.
Q. Okay. And when you -- when you saw it, did you ask him the question of why are you telling -- saying

that I'm a sex addict?
A. No. It never really got that far, because he contacted me and said that Monica and Ron rejected what he wrote.
Q. Okay.
A. It -- it didn't go very far at all.
Q. All right. If you turn to page 1 of Exhibit 12. I want to start from the top, the second email on March 26, 2019, at 4:06 p.m. Are you with me?
A. 4:06.
MR. BEARD: Sorry, Counsel, which -- which page?
Q. (BY MR. LEMOINE) Page 1.
A. From Chuck at 4:06?
Q. Yes.
A. Yes.
Q. Are you with me?
A. Sure.
Q. All right. It says: Sean and Chris are not going to show up in court for you. You will be on your own.
Do you have any idea who he might be referring to, the Sean and Chris?
A. The only Sean and Chris I know in this situation are Sean Schemmel and Chris Sabat.

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Q. And who is Sean Schemmel?
A. He's a voice actor.
Q. And any idea why Mr. Huber would be referencing Sean Schemmel in this -- in this email?
A. No, sir, you'll have to ask Mr. Huber.
Q. And do you recall receiving this part of the email chain from -- where Mr. Huber forwarded it --
A. No, I don't recall. I don't recall if he sent me this, because I don't recall seeing any -- any correspondence between he and Monica. He told me that he had sent something to her and -- and that they had reject -- refused to agree to it.
Q. Okay. And did he ever have a discussion of what the terms were that -- that he sent?
A. No. No, sir.
Q. Did you ask him what the terms were?
A. Not that I recall.
Q. So just so I understand, how did -- how did this Chuck Huber involvement, how did it come to your knowledge?
A. Well, as -- as you -- as you pointed out, we talked about earlier this morning, Chuck has been a friend, I've considered Chuck a friend for a long time, and Chuck considers himself a friend of -- of Monica's and Jamie's, as well, and I -- I assume he was troubled

about the events and wanted to see if he could step in and -- and help out.
Q. But totally operating on his own as to what --
A. Yes, absolutely.
Q. All right. Have you and Mr. Huber ever been involved in any companies together?
A. Companies, no, sir.
Q. Do you own or control a company called September the Movie, LLC?
A. No, sir.
Q. Any idea what that company is?
A. No, sir.
MR. BEARD: September the Movie?
MR. LEMOINE: Yep, LLC.
A. I know that Chuck -- no, I'm not even -- I don't -- because I don't know. I'm sorry, I shouldn't --
Q. (BY MR. LEMOINE) Yeah.
A. I shouldn't speculate, right? I don't know. I -- I certainly don't have anything to do with that. I don't know what it is.
Q. Okay. I'm going to -- this has been premarked as Exhibit 13.
(Exhibit 13 marked.)
Q. (BY MR. LEMOINE) Again, I'll represent to you

this is communications between Mr. Huber and Ms. -- Ms. Marchi, or Marchi.
A. I think she -- yeah, I think does she say Marchi, I think.
Q. Marchi?
A. Yes.
Q. I want to start on -- at the very top --
A. Uh-huh.
Q. -- from Ms. Marchi. Do you recall ever receiving this particular email chain?
A. I -- I don't recall that. Like I said, I recall Chuck telling me that they refused, so --
Q. All right. So if you look at the second email on March 26th, 2019, at 3:55, from Mr. Huber. Are you with me?
A. 3:55 p.m.?
Q. Yes, sir.
A. Yes, sir.
Q. I've discussed it with --
MR. BEARD: March 6th, right?
THE WITNESS: The second one.
Q. (BY MR. LEMOINE) It starts, I've discussed it with them, they have the statements and have given their input, I'm pushing as hard as I can on both ends to try and meet in the middle.

Do you have any idea who he would have given these statements to?
A. I'm sorry, any idea who Chuck --
Q. Yeah. Yeah, who he's referencing?
A. I -- I assume he's referencing Monica and Jamie. I -- I assume.
Q. Okay. So he's writing to Ms. Marchi and saying --
A. Oh, then he must have been referencing Ron and Monica if he's writing to Jamie. I suppose he was probably referencing me, as well.
Q. Okay. But certainly you disavow any knowledge of receiving any statements from Ms. --
A. I said I don't recall.
THE REPORTER: Would you -- would you wait until he's finished?
THE WITNESS: I'm so sorry. I'm so sorry.
THE REPORTER: Thank you.
THE WITNESS: I apologize.
THE REPORTER: It just helps, a clean record.
THE WITNESS: Sorry.
THE REPORTER: Thank you.
Q. (BY MR. LEMOINE) Okay. So --
A. Sorry, Sean.

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Q. Yeah. You don't recall receiving any statements from Mr. Huber where you would admit to something like being a sex addict?
A. No, sir.
Q. And -- and as you sit here today, you don't believe you're a sex addict?
A. No, sir.
Q. Are you seeking any mental anguish damages in this lawsuit? Do you know?
A. No, sir.
Q. Okay. And so is that -- question was unclear. Are you -- are you seeking mental anguish damages?
A. There is certainly a lot of mental anguish.
Q. All right. Well, let me ask it this way.
A. I'm just seeking to clear my name, sir.
Q. Okay. And what would that look like? What does clear your name mean?
A. To stop people from -- to -- to end the public attacks, and to somehow reach an agreement where these people do not contact events and production companies to try to keep me from working and making a living.
Q. Okay. So are you seeking any treatment of any type from any health care professionals as a result of the defamation that you claim you've suffered?

MR. BEARD: Objection, privileged. Objection, privileged.
Do not answer.
Q. (BY MR. LEMOINE) Okay.
MR. BEARD: You can answer the question, but any further delving into it, I'll object.
You can say yes or no.
MR. LEMOINE: I mean, maybe -- Mr. Beard, maybe you can just clear this up.
Is he seeking mental -- are you-all seeking mental anguish damages?
MR. BEARD: I think we've asked for broad damages. Yeah, that's probably a part of it.
MR. LEMOINE: Okay. So --
MR. BEARD: You know, I mean, I don't -- I don't have the pleadings in front of me, quite frankly.
MR. LEMOINE: All right.
Q. (BY MR. LEMOINE) Are you taking any medication as a result of the defamation that you claim to have suffered?
A. I am taking two medications. One is Losartan for high blood pressure and one is Zoloft for -- I guess it's an antidepressant.
Q. And did you take that before these allegations came out?

A. No. That started -- that started in mid, late January.
Q. Okay. Have you been unable to work as a result of any mental issues that you're suffering because of this alleged defamation? Not that somebody is not letting you work, but you can't get up and go to work. Do you understand the distinction?
A. If I'm honest, and of course I -- I'm supposed to be.
Q. If you want to --
A. I had -- for the first several months, I found it very difficult to -- you know, to really do much of anything. I had -- I had offers from people to do certain things, and I, you know, found it very difficult to -- to -- to get motivated.
Q. Did you do those --
A. I didn't sleep, I didn't eat, I was losing weight.
Q. Did you do those things you had offers to do? Did you turn them down?
A. I haven't done them. I asked them if I could have some time.
Q. Okay. All right. As I understand it, you're -- you may be seeking a million dollars or more in this lawsuit?

A. No, sir.
Q. No?
A. Not -- not that I'm aware of. I -- I haven't -- I have not discussed any numbers of any kind of monetary anything.
Q. All right. Do you believe that you've been damaged as a result of the defamation of Mrs. --
A. Yes.
Q. Let me get the question out.
A. I'm sorry. I'm so sorry. Sorry.
Q. Do you believe that you have been damaged as a result of the defamatory statements that you allege were made by the defendants in this case?
A. Yes.
Q. Do you have a -- can you put a monetary value on that?
A. No.
Q. What would you need to know to put a monetary value on that?
A. If I may, Sean, let me answer by saying this: I didn't -- I didn't want to do this. I sat by for five months and let these people destroy me online. I didn't even know what to do. I -- I -- I literally did not respond. I did not attack back. I didn't even defend. I just couldn't believe it was happening for five

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months.

And when it got to the point where I had lost so much, I -- I realized that the -- my only recourse was legal recourse. I wasn't looking for money, I wasn't asking for anything but to be left alone and -- and to -- you know, to be allowed to -- to have my career and my work.

Q. All right.

MR. LEMOINE: I'm going to object as nonresponsive.

Q. (BY MR. LEMOINE) Tell me how, in 2018, how did you make money? How did you generate a living? What were things that you did?

A. I -- I do voice acting. I write music for, like, ad agencies, commercials, private individuals. I do graphic design work. I act on camera and I do event appearances.

Q. Is one -- is one of those more lucrative than the other on a given -- in every year?

A. They're all over the place. They fluctuate.

Q. So it just depends?

A. Yes, sir.

Q. And then when you say you write music, does that mean you sing and -- and write, or just write music?

A. No, sir. I play the piano and I sing, and I write and I produce.

If you guys live in -- in this area, you probably have heard a couple of my jingles on the radio, so --

Q. How many conventions, for these anime conventions, how many of those do you attend a year?

A. It varies. It fluctuates from year to year.

Q. So you're not consistent?

A. No, sir.

Q. And do you typically have a contract with these conventions, a written agreement?

A. Sometime -- sorry. Sorry. Sometimes.

Q. It just depends?

A. Yes, sir.

Q. And --

A. Some of them -- if I may, some of them are run by people that I've known for a while, and they're just like, hey, do you want to come to my show? Okay.

Q. Is that something you schedule out months, years in advance?

A. It -- again, it varies. Sometimes months in advance, sometimes a year in advance, sometimes weeks in advance, if I'm free.

Q. Do you get paid by the convention to show up?

A. Occasionally.

Q. How else do you make money when you attend the conventions?

A. Well, when the convention appearances started, and Monica knows this as well as I do, a lot of the events didn't pay anything. It was literally just kind of helping build the industry, you know, promoting projects we were working on. There wasn't any -- there really wasn't any payment at all.

And, again, it fluctuates. Some conventions will -- will give you a flat amount to appear and you'll spend all weekend signing autographs. Some events will just provide air fare and hotel and you might -- you might make some money selling a headshot or signing a picture, or --

Q. Do most conventions that you go to, you sell some type of merchandise?

A. Yes.

Q. Isn't that pretty standard at every convention?

A. Yes, for -- for every voice actor.

Q. And how do you keep track of the amount of money that you get paid at conventions?

A. I don't. My -- I have an accountant who takes care of that.

Q. And does the accountant go to the conventions

with you?

A. No, sir.

Q. So is there someone there that collects the money?

A. Yes. The convention usually provides someone, a handler or a liaison of sorts.

Q. And are most of these transactions in cash?

A. They vary.

Q. Does the handler bring some type of device to track, to swipe credit cards?

A. Yes. There's a -- there's a Square card.

Q. And at the end of the --

A. A Square reader.

Q. At the end of the convention, are you provided a check or direct deposit or cash?

A. Everything you just said. It varies.

Q. And then you provide that to your accountant?

A. Yes, sir.

Q. Do you know what your gross income was in 2018?

A. Not offhand. I'd have to check with him.

Q. But your accountant would know?

A. Yes, sir.

Q. And I guess if I asked you that question for 2017 to 2014, it would be the same?

A. Yes, sir.

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Q. And does your accountant also do your taxes?
A. Yes, sir.
Q. Has there been a drop off in the amount of money that you have made in 2019, after these allegations started coming out against you?
A. Yes, sir.
Q. How much?
A. I don't know. There -- there -- it's -- there's not a specific amount, because you don't know. There are so many variables. You just -- you can't know. But, obviously, if you don't go to an event, you're not going to do anything. So any time -- you know, going would obviously be different than not going.
Q. You said earlier that you sat by for five months before you did anything with regard to these allegations.
You would agree with me the GoFundMe campaign started at the end of February 2019, correct?
A. I believe that's what your -- the exhibit you gave me said. I -- I don't remember when it started.
Q. And -- and then you put a tweet out on February 20th where you talk about hiring a law firm, correct?
A. I -- I don't remember the date, but I -- I put out a tweet if -- I put out very few tweets, and one --

the one that I remember was I -- I felt like I -- I have no recourse left, but --
Q. Okay. If you pull Exhibit 17 back out in front of you.
A. Okay.
Q. Do you recall -- do you recall Exhibit 17 is your February 20th tweet where you discuss GoFundMe being set up? Do you remember that?
A. Yes, sir. Yes, sir.
Q. All right. And you'd agree with me that what you're telling the people that follow you on Twitter is that you've retained a law form -- firm to defend your reputation as of February 20th; is that right?
A. Yeah, see, by the way, that's a different law firm than -- than Mr. Beard, I believe. It wasn't -- I can't keep track of the dates. There was the Tonya woman that I mentioned earlier.
MR. BEARD: If I could interject, Counsel.
THE WITNESS: I'm sorry.
MR. LEMOINE: Sure.
THE WITNESS: I --
MR. BEARD: Yeah, you hired us, like, I think on the 20th, but Tonya was not officially discharged until --
THE WITNESS: Oh, okay.

MR. BEARD: -- a couple of weeks later.
THE WITNESS: Okay.
MR. BEARD: It was kind of a blur.
MR. LEMOINE: Okay.
MR. BEARD: So -- but you had retained counsel.
THE WITNESS: Okay.
Q. (BY MR. LEMOINE) Okay. Just so I'm clear, by February 20th, you had retained Mr. Beard?
A. Yes, sir.
Q. And did you know Mr. Beard prior to this -- these events that --
A. No, sir.
Q. -- led to this lawsuit?
And who introduced you to him?
A. Mr. Rekieta.
Q. Do you know their -- how their -- where their relationship started?
A. No, I don't.
Q. Did -- and Mr. Rekieta never told you how he knew Mr. Beard?
A. No. Mr. Rekieta told me that he knew I was in Texas and that he knew an -- an attorney in Texas if I wanted to speak with him.
Q. And so after you hired Mr. Beard, is it -- is

it your testimony that you basically sat silently for the next couple of months until you finally decided to sue somebody?
A. Pretty much.
Q. Can you think of instances in the last five, six years where someone has impugned your reputation in the voice acting community and you just walked away from it and did nothing?
A. Certainly.
Q. Does that happen often?
A. There are always disgruntled fans and people that are looking for attention in some way. I have largely ignored it because attention is exactly what they want, so I tend to ignore it. And it's never -- never been an issue. And -- and this time, this all started, ironically, at the moment that the Dragon Ball Broly movie that I was the main character in was released, to the day. The day that it was released, this was launched against me. And I didn't do anything about it for a while, quite a while, thinking, well, it's just the same old people trying to get some attention. And then it just didn't -- it just didn't abate, and so --
Q. And -- and what happened in -- when the Dragon Ball movie was released in January of 2019?

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A. What do you mean what happened? May I ask what you mean?

Q. You said the same day it was released, this started. What -- what happened?

A. The social media attacks began and, like I said, this has happened in the past, you know, so --

Q. All right. Prior -- prior to 2019, have you ever been banned from a convention?

A. Not to my knowledge.

Q. And prior to 2019, have you ever been asked not to come back to a convention?

A. Not to my knowledge.

Q. Prior to 2019, have you ever not gotten an invitation to a convention that you attended a year before?

A. Well, that's not unusual at all. Because once the convention has you as a guest, they don't typically bring the same people back every year because of the number of people in the industry. In fact, I'm actually -- I'm actually an exception because I -- I -- I -- I do -- I -- I do get invited back often to the same events, so I -- if somebody doesn't invite me back, there's nothing really unusual about that.

MR. LEMOINE: All right. Object as nonresponsive.

A. Okay.

Q. (BY MR. LEMOINE) Has anyone ever told you that you are not welcome back at a particular convention?

A. No, sir.

Q. What about Metrocon, have you ever been not invited back to Metrocon Tampa?

A. I was at Metrocon two years ago, sir.

Q. But you didn't -- so that would have been in 2017?

A. I -- I -- I think it was 2017.

Q. Didn't go back in 2018?

A. No, sir.

Q. Didn't get invited back in 2019?

A. No, sir.

Q. And do you know why?

A. No, sir.

Q. Okay. What about Anime Central, have you ever --

A. I was at Anime Central, I believe, two years ago, maybe three years ago.

Q. 2016 or 2017?

A. Yes, I've -- I've been there.

Q. And haven't been -- been back since that last time?

A. No, sir.

Q. All right. What about Tekkoshocon?

A. I was at Tekkoshocon last year.

Q. 2018?

A. Yes, sir.

Q. And did you get invited back for 2019?

A. No. As I said, typically with 70 or 80 voice actors and industry people, writers, directors, artists, they don't typically invite the same people back every year.

MR. LEMOINE: Object as nonresponsive after no.

Q. (BY MR. LEMOINE) What about the RTX, Rooster Teeth Convention?

A. I attended that event two years -- two years ago, and was not there last year, and was supposed to be back there this year, but there -- the -- it was rescinded, the invitation was rescinded.

Q. All right. What about Louisiana anime MechaCon, have you ever been uninvited?

A. Not to my knowledge.

Q. When's the last time you went to that con?

A. I -- I don't know, sir. I don't remember.

Q. Do you know a woman named Kat Thompson?

A. Not -- no, don't believe so. Not by name.

Q. Okay. Are you familiar with a company called

Sentai Filmworks? It's S-E-N-T-A-I.

A. I believe Sentai is the new company that was formed in Houston. It's an anime dubbing company.

Q. What was the name of the company before then?

A. I believe it was ADV Films.

Q. Okay. And were you ever fired from either Sentai or AD Film -- ADV Films?

A. No, sir. I moved.

Q. Okay. So you weren't -- you weren't fired by them?

A. No, sir.

Q. Okay.

A. I moved -- I was living in Houston and I moved to L.A., or started working more in L.A. I even came back on a couple of occasions and worked at Sentai.

Q. What about Gear Box, have you ever been terminated by Gear Box?

A. I don't think I have ever worked for Gear Box.

Q. Are you familiar with a company called Rooster Teeth Productions, LLC?

A. Yes, sir.

Q. Just call it Rooster Teeth for short.

A. Yes, sir.

Q. What does Rooster Teeth do?

A. They dub -- they -- they produce, I believe,

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original animated content.

Q. And have you worked for Rooster Teeth in the past?

A. Yes, sir.

Q. From when to when?

A. Oh, goodness. They cast me in a production probably four -- I don't even know, four, five years ago. And I recorded my lines remotely and sent them my lines, and played a character in a -- recurring character in a show of theirs until I was terminated earlier this year.

Q. And -- and was your relationship with Rooster Teeth, was -- were you an employee or independent contractor?

A. Just -- just an independent contractor, I believe.

Q. And -- and you know the distinction between an employee and an independent contractor?

A. I -- I -- I assume -- I'm so sorry. I assume, like an employee, like, gets a regular paycheck, and they take out taxes and, you know, that kind of thing, and -- and independent contractor is just hired per project.

Is that close?

Q. I would say that's close.

A. Okay.

Q. And -- and do you know the difference between a W-2 and a 1099?

A. Yes. Well, one of them is what an employee gets and one of them is -- I guess; is that right?

Q. That's right.

A. Okay.

Q. Okay. So do you know if you -- you would -- as far as you knew, you were an independent contractor for Rooster Teeth?

A. As far as I know. I have been hired to do so many recording projects for 20 years that I don't even really think about the distinction much.

(Exhibit 19 marked.)

Q. (BY MR. LEMOINE) Let me show you what we're going to -- we're getting premarked as Exhibit 19. If you'd look on page 7 of Exhibit 19. Is that your signature?

A. Yes, sir.

Q. And you recognize this as an independent contractor agreement --

A. Yes, sir.

Q. -- that you had with Rooster Teeth?

A. Yes, sir.

Q. And you signed it sometime in December of 2018?

A. Yeah. They sent it to me at the very end of last year.

Q. All right. And after December 2018, did you do any work under this independent contractor agreement for Rooster Teeth?

A. I -- I don't remember. I don't think so. I mean, I -- like I say, I play this recurring character, and as they would need more lines from me, they would send me the lines and I would record them and send them back. I really didn't -- didn't keep track of the dates, but I don't think so.

Q. And are you typically paid, like, a day rate or an hourly rate?

A. Yes.

Q. Which one?

A. Oh, sorry. Hourly rate.

Q. It's an hourly rate?

A. Yes, sir.

Q. Okay. And you keep your time and send it in, and they'd send you a check?

A. Yes, sir.

Q. And do you get any type of back-end percentage of --

A. No, sir.

Q. So not from Rooster Teeth?

A. I wish. No, sir.

Q. Now, at any point in time, were you made aware that Rooster Teeth was doing any type of investigation into you?

A. No, sir.

Q. You said at some point you were terminated by Rooster Teeth; is that correct?

A. Yes, sir.

Q. How did -- how was that communicated to you?

A. By email.

Q. Okay. And what was the -- who sent you the email?

A. Well, there were several people on the email. They were mostly, you know, I -- I assumed people at Rooster Teeth. And they said -- it was really interesting -- that I had been corresponding with a friend, who is one of their producers, named Koen, who I believe might have even signed this. Yes, Koen Wooten.

He and I had been corresponding at the very beginning of this social media, for several weeks at the beginning, and expressed how unfortunate and how crazy it was, and -- and that he certainly didn't believe any of the -- the garbage that was online. And then out of the blue, without any real advance anything, I got an email one day from Rooster Teeth, and it was from, I

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guess, Gray Haddock was one of the people on the email, I expect Koen was on it, there were probably four or five. And it was sent to me and it basically said, Effective immediately, we will no longer be requiring your services.

Q. Was there any explanation?

A. You know what, yeah. It said, Pursuant to section something or other, or, paragraph something or other. And I wrote them back and said, I'm really sorry to hear this. Can you please send me the portion of the contract that you're -- that you're citing? Like, what -- in other words, what, why, what did I do?

And I never got a response. Well, I didn't get an intended response. I got a response from someone -- one of the people on the thread, on the Rooster Teeth email, who clearly didn't mean to send it to me, and it said, quote, I'm sure we're all in agreement, but no one is to reply to Vic.

I don't think they meant to send that to me. But I never heard back from anybody and I never attempted to contact anybody.

Q. Okay. So as far as you know, or sitting here today, you don't really know why Rooster Teeth terminated you?

A. No, sir.

Q. No one has ever talked to you about it?

A. No, sir.

Q. And no one has ever said that it was because of anything that any of the Defendants did?

A. No, sir.

Q. Do -- and do you know if you produced these communications that Rooster Teeth sent you, to your attorneys?

A. Yes, sir.

Q. And do you know if your attorneys ever reached out and talked to Rooster Teeth about why you were terminated?

A. Yes, I believe he did. I believe he attempted to contact their legal counsel.

Q. And do you know if they responded?

A. They did respond, but I don't remember the details of it.

Q. Okay.

A. If I remember correctly, they -- they -- there wasn't really much of anything, any kind of a response.

Q. Did -- Mrs. Marchi or Mrs. Rial or Mr. Toye work for Rooster Teeth, to your knowledge?

A. Ms. Rial does.

Q. Okay. And do you know if she's an employee or an independent contractor?

A. I don't know. She is a voice actress and she was cast in a new project they're working on.

Q. Are you familiar with a -- obviously you are, but you're familiar with the company Funimation Productions --

A. Oh, yes.

Q. -- LLC, correct?

A. Yes.

Q. And that's the Defendant that you've sued in this case?

A. Yes, sir.

Q. And what do they do?

A. They -- they dub Japanese anime into English.

Q. Similar to what Rooster Teeth does?

A. Yes, sir. Well, no, actually, Rooster Teeth does original programming. They make up their own stories and they animate them themselves, and the vast majority -- if I'm not mistaken, the vast majority of Funimation's properties are Japanese animation that have already been produced, and --

Q. And were you an employee or an independent contractor with Funimation?

A. I assume -- I assume, again, I was an independent contractor. There was a period, a year, in 2017, that I was hired to direct a series for

Funimation, and I -- I lived in a hotel in -- in Irving for 12 weeks and -- and directed a series for them. I -- I -- I assume I was -- that was probably an employee -- like a -- an employment thing. It was different than the contracted voice actor thing.

Q. Did you get a salary or were you paid by hourly work?

A. Well, it was -- it was -- it was hourly, but it -- but there was like -- it was like, you know, taxes taken out, kind of thing. You know, it was like a --

Q. Does -- Mrs. Rial, has she worked -- ever worked for Funimation?

A. Oh, yes.

Q. And do you know if she was an employee or an independent contractor?

A. I don't know. I know that she has directed, as well, and I know she's done a great deal of voice acting, but I don't know her -- her employment status with them.

Q. And what about Mrs. Marchi, do you know if she --

A. The same. I don't know.

Q. And what about Mr. Toye, did he work for Funimation?

A. I don't know.

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Q. Anybody ever told you Mr. Toye worked for Funimation?

A. I can't recall that anyone has.

Q. Were you ever interviewed at any point in time by Funimation with regard to allegations of improper conduct by you?

A. I was contacted in mid-January, very shortly after this -- the online social media stuff started, I was contacted by someone at Funimation. Basically, it was about a 20-second phone call where they basically said, Someone from Sony would like to chat with you, can you be available tomorrow at this time.

And so I said yes. And someone from Sony contacted me and said that they had received some -- some incidents that they wanted to ask me about. And that was the first I had heard of it.

Q. Okay. And that's the only time that -- that you've ever dealt with any investigation --

A. Yes, sir.

Q. -- while at Sony?

A. Yes, sir.

Q. Does the name Tammi Denbow ring a bell to you?

A. Not off the top of my head, no, sir.

(Exhibit 24 marked.)

Q. (BY MR. LEMOINE) Let me show you what we've

premarked as Exhibit 24.

Have you ever seen Exhibit 24 before?

A. Yes, sir.

Q. And what is Exhibit 24?

A. It was apparently an email that Sony sent to me, and I replied.

Q. And starting at the top, page 1 of Exhibit 24, victhewop, that's your email?

A. Yes, sir.

Q. And I assume the wop is a cute reference, in fact, of your Italian heritage?

A. Yes, sir.

Q. And then it says: Forwarding confidential discussion to Lisa --

A. She's laughing at my name. No, I'm just kidding.

Q. -- to -- to Lisa Hansell. That's the lady that was here earlier in the deposition?

A. I'm sorry. Yes.

Q. If you look at the top of Exhibit 24, are you with me, on page 1, very top?

A. Oh, yes.

Q. This is you forwarding this communication to Ms. Hansell?

A. Uh-huh.

Q. Why would you be forwarding a confidential communication between you and someone at phony -- Sony to Ms. Hansell?

A. Well, I don't consider it confidential between me and my friends. I mean, this is my life, this is my situation, and Lisa was a friend and I shared it with her.

Q. Okay. Did you share it with anybody else?

A. No, sir.

Q. Did you and Ms. Hansell discuss the situation?

A. Not to my recollection, no.

Q. So you just forwarded it to her, and then there were no discussions after the fact?

A. Not to my recollection, no.

Q. And is Ms. Hansell an employee or independent contractor for you, or --

A. No.

Q. Just a friend?

A. Yes.

Q. And how long have you-all been friends?

A. Oh, maybe six, six or seven years.

Q. All right. If you would turn to page 4 of Exhibit 24. Are you with me?

A. Uh-huh.

Q. All right.

A. Yes, sir.

Q. The bottom of the page, Ms. Tanny -- Tammi Denbow, does that refresh your recollection --

A. Yeah.

Q. -- of who she is?

A. Yeah, that's the woman you asked me about, yes. Apparently, that's the name of the woman at Sony.

Q. Okay. So prior to January 25, 2019, you had never met Ms. Denbow and didn't know who she was?

A. Not to my -- no, not to my recollection.

Q. All right. And January 25, 2019 is the first time that you even knew that there was any kind of issue --

A. Yes, sir.

Q. -- with your work?

All right. So did you have a conversation with Ms. Denbow?

A. Yes. Yes, sir.

Q. Okay. What -- what do you recall of that conversation?

A. She asked me about three incidents that had come to their attention. The first one was a kiss with a coworker at Funimation a few years earlier. One was an interaction with Monica at a convention with a jelly bean. And the third one was an incident that was

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reported to them of two twin ladies who I had met several times at conventions and had invited to my room.

Q. Okay. So before I start asking you questions --

MR. BEARD: Counsel, can we take a 30-second break?

MR. LEMOINE: Off the record.

THE VIDEOGRAPHER: We're going off the record at 1:34.

(Break taken from 1:34 p.m. to 1:39 p.m.)

THE VIDEOGRAPHER: And we're back on the record, the time is 1:39.

Q. (BY MR. LEMOINE) All right. So as I -- as I recall your testimony, the three separate incidences that Ms. Denbow wanted to discuss with you --

A. Yes.

Q. -- of those three, one of them is -- is Mrs. Rial, correct?

A. Yes.

Q. The other two instances, are those women who have publicly accused you of anything, meaning it's out on -- they've given statements to magazines or otherwise disclosed their names?

A. Not to my knowledge.

Q. All right. You know who these -- you know

their -- their identities, correct?

A. Yes.

Q. If I ask you, you can tell me their names, can't you?

A. Yes.

MR. LEMOINE: Mr. Beard, I would like an agreement that with regard to questions surrounding not Mrs. Rial, but these other two incidents, that we agree to keep that confidential until we get a ruling from the court.

MR. BEARD: That's -- yeah, I think that will be okay. That's -- just to be clear, that's the --

MR. LEMOINE: Don't say the names.

MR. BEARD: Right. I was about to do that.

MS. CHRISTIE: That's the other two incidents.

MR. BEARD: Oh, besides the jelly bean?

MR. LEMOINE: Let me see if I can articulate the -- the -- the request.

MR. BEARD: That's fine.

MR. LEMOINE: What -- what we would like to do is -- is currently hold -- put the portion of the deposition under seal with regard to the two non Monica Rial incidents.

MR. BEARD: The names.

MR. LEMOINE: The names.

MR. BEARD: Nothing more?

MR. LEMOINE: Yes, the --

MR. BEARD: Agreed.

MR. LEMOINE: -- and the names.

MR. BEARD: Agreed.

MR. ERICK: Yeah, that was -- I mean, it -- it will include, you know, their residence and things like that, but we're not going to get into that.

MR. BEARD: Names, addresses.

MR. LEMOINE: Identifying information.

MR. ERICK: Right.

MR. LEMOINE: Okay. So --

MR. BEARD: Agreed.

MR. LEMOINE: -- starting from this point, the deposition will be under seal until I stop asking questions about these two incidents.

MR. BEARD: The deposition or just the names?

MR. ERICK: I mean, just the names. I mean, just the names of the contact information. The allegations I think are --

Q. (BY MR. LEMOINE) All right. So the first incident with the woman that you had a kiss with, what's her name?

A. I'm allowed to say -- is it okay if I say?

Q. You say it and we're going to -- we'll -- it will be removed from the transcript --

A. Okay.

Q. -- until the court rules whether or not it's allowed.

MR. BEARD: Yeah, you're going to have to --

A. Okay. XXXX XXXXXXXXX.

Q. (BY MR. LEMOINE) And who was Ms. XXXXXXXXX?

A. She was an employee at Funimation.

Q. And do you know what her title was?

A. I believe she was a translator or a checker. She would proofread and proof check subtitles.

Q. And when was this kiss that occurred?

A. At least three, two, three years ago.

Q. So 2019, so it's either 2016 or 2017?

A. It wasn't '17. So '15 or '16, I guess.

Q. And you were an independent contractor at Funimation at the time?

A. Yes, sir.

Q. And the kiss occurred at the Funimation offices?

A. Yes, sir.

Q. And it was only one -- one kiss?

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A. Yes, sir.
Q. Who kissed who? Or, how about this: Who initiated the kiss?
A. I did. I asked her if I could kiss her, and she said --
Q. And what did she say?
A. Yes -- no, actually, she said, close the door. And I went over and -- and closed the door.
I'd visited her every time I was at the studio. We -- you know, we had been kind of flirting with each other and corresponding for quite some time before that.
Q. And in 2015, you were engaged to Mrs. Specht; is that correct?
A. Yes, sir.
Q. How long had you-all been engaged at that point?
A. We got engaged in -- bear with me. Let me do a little math. Roughly, seven years ago, so let's -- 2012, 2013.
Q. Did you and Mrs. Specht have an exclusive relationship?
A. Yes.
Q. Did you disclose to Ms. Specht at any time that you kissed Ms. XXXXXXXXX?

A. No.
Q. After you kissed, did it proceed from there?
A. Did what proceed?
Q. Your relationship, if you had one.
A. With Ms. XXXXXXXXX?
Q. Yes.
A. No.
Q. Why not?
A. I don't think either one of us were looking for any kind of a, you know, ongoing long-term thing.
Q. And was there any other relationship beside -- physical relationship besides that one kiss?
A. With Ms. XXXXXXXXX?
Q. Yes.
A. No, sir.
Q. No? No sex or --
A. No, sir.
Q. -- sexual-related activities?
Anybody else at Funimation, that was employed at Funimation, that you've kissed at any point in time?
A. No, sir.
Q. So as far as you were concerned, Ms. XXXXXXXXX, it was a consensual kiss?
A. Yes, sir.

Q. And -- but it never -- never went anywhere after that?
A. No, sir.
Q. Did you text or email Ms. XXXXXXXXX after that incident?
A. I expect that we exchanged -- we exchanged a few texts, yes, as a matter of fact.
Q. But she never pursued you after that kiss?
A. Well, not in any -- not in any sexual way. Whenever I was in town recording, I would let her know, and we talked about getting together sometime or having lunch or something, but nothing heavy.
Q. Right. And when Ms. Denbow -- did Ms. Denbow explain to you what the allegations were, or did she just give you a name and say, what's the relationship?
A. Actually, she didn't give me any names, and I asked her, Am I allowed to know who you're talking about. And she -- she told -- that was the point at which she told me their names.
Q. Okay. And -- but before she gave you the names, did she describe the alleged incident that the people had relayed to her?
A. Yes.
Q. Okay. So with regard to Mrs. XXXXXXXXX, what was -- what is your recollection how Ms. Denbow

explained that interaction?
A. She said, do you recall going into someone's office at Funimation and forcibly kissing them?
Q. And you knew at that point in time that the only person that could make -- even remotely try and make that allegation was Ms. XXXXXXXXX?
A. Well, I -- Ms. XXXXXXXXX was the only one that I had gone into an office and kissed.
Q. Okay. If you're engaged to Ms. Specht, why kiss Ms. XXXXXXXXX?
A. Because I made some mistakes.
Q. So is that not -- not the first mistake you made in terms of your exclusive relationship with Ms. Specht?
A. No.
Q. How many mistakes do you -- would you say you made with Ms. Specht during the course of your engagement?
A. I don't know.
Q. More than one?
A. Yes, sir.
Q. More than five?
A. Yes, sir.
Q. More than 50?
A. I doubt it.

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Q. More than 25?
A. I don't know.
Q. Okay. So with regard to the twin ladies, do you know their names?
A. Yes.
Q. And who are they?
A. XXXX and XXXXX XXXX.
Q. And how do you know them?
A. They had come to at least three or four conventions that I was a guest at. They would always come to my autograph table and to my Q and A sessions and sit in the front row and come and say hello, and --
Q. All right. And what was -- how did Ms. Denbow explain that particular allegation?
A. She said, Do you recall inviting two girls, twins, two women, to your room at a convention. And I said yes. And she said, Do you recall forcibly kissing one of them, which I did not.
Q. All right. So -- and what did you tell -- what was your recollection that you relayed to Ms. Denbow?
A. My recollection was that I had seen these -- these two ladies at multiple conventions, and I was under the very clear impression that they were interested or attracted to me. And they were very kind, attractive, friendly young ladies.

And so after the fourth or fifth time that I saw them at an event, one night or one day I asked, I don't remember when, I asked them if they would -- if they wanted to come to my room. I invited them to my room. They came, voluntarily. I let them in. One of them sat on the bed, the other one sat in a chair in the room, and I sat in another chair in the room.
We made some small talk, and then they asked me why I invited them to my room. And I said, Well, I was under the impression that there was a lot of mutual attraction going on here and I thought maybe you might be interested in -- in some -- you know, in some kind of a sexual interaction. They told me they were not, I said okay, and they left.
Q. Do you remember what time frame this would be, what year?
A. No. It was several years ago.
Q. It was while you were engaged to Ms. Specht, though?
A. Yes, sir.
Q. And your intent in inviting them to your room was to have sex with them?
A. If they were consensual.
Q. And did you want the -- the two sisters to have sex with each other --

A. No.
Q. -- or just you? Because that would be creepy, right?
A. If they were consensual, just me.
Q. And while you were engaged to Mrs. Specht, had you ever had that happen before, where you had consensual sex with more than one woman --
A. No.
Q. -- at the same time?
A. No, sir.
Q. What about after your engagement with Ms. Specht broke off?
A. No, sir.
Q. And while you were engaged with Ms. Specht, did you have consensual sex with any women at any conventions?
A. Yes, sir.
Q. How many?
A. I don't remember.
Q. More than 20?
A. No.
Q. Did you ever have -- while you were engaged with Ms. Specht, did you ever have sexual relations with any -- with a woman more than once?
A. Yes.

Q. And who was that?
A. I --
Q. We can put it -- you can make that confidential, as well. We won't disclose it.
A. I -- I --
Q. You don't want to disclose it?
A. Well, it's not that.
Q. You don't remember?
A. I mean, do you want -- do you really want me to just name people or someone? Is it -- I mean, I'll -- give me a second and I'll think about it. I mean --
MR. BEARD: Let's have an agreement that these names will be kept confidential.
MR. LEMOINE: That's right.
MR. BEARD: Okay. Agreed.
A. Chelsea Beard, ironically. No relation.
I -- I can't seem to recall --
Q. (BY MR. LEMOINE) How old was Mrs. Beard?
A. Twenty-seven.
Q. And how long ago was it that you-all were having a -- did you-all have a relationship as opposed to just sex one time?
A. Say that again, please, I'm sorry.
Q. Did you-all have a relationship or did you just have sex one time?

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A. No. We -- we developed a relationship.
Q. And that relationship continued parallel to you being engaged with Ms. Specht?
A. Yes, sir.
Q. And you didn't disclose the existence of that relationship to Ms. Specht while it was --
A. No, sir.
Q. -- going on?
How old were the XXXX twins when you invited them up for the liaison?
A. Twenty, twenty-one.
Q. How old would you have been?
A. That would have been 40 -- I would have been, I don't know, 50, 51, I don't know.
Q. Any other women -- well, let me back up.
As far as you're concerned, the interaction with the twins is completely consensual?
A. Yes. There was very little interaction.
Q. All right. So you didn't -- there was -- was there -- there was no kissing, there was no nothing?
A. No.
Q. It was just a discussion, and then they left?
A. That's correct.
Q. And were you disappointed?
A. I suppose.

Q. Was it fairly common for you to invite women to your room while you were at conventions?
A. Actually, very uncommon.
Q. So the -- the -- the XXXX -- the twins was kind of a -- that was a one-off kind of a deal?
A. Yes. And, again, the fact that I had seen them at four or five events over the years leading up to this. It wasn't like, you know, I went walking down the hallway and I point, you, I want you, you know. It -- they were people that -- that I had seen and spoken to and interacted with multiple times leading up to this event, which is why I developed the impression that they were interested in me.
Q. Did you ask them to strip for you in your room?
A. No.
Q. And did Ms. Denbow communicate to you that the twins thought that the interaction was not consensual?
A. Yes. She told me that -- yes. As I mentioned, she said, do you recall this, and forcibly kissing them, and, no, that is not the way it happened.
Q. Have you ever stated to anyone that you, in the last 10 years, that you hired prostitutes or escorts?
A. I have.
Q. And who would you have said that to?
A. Oh, I don't remember who I said it to. I -- I

thought you were asking me if I ever have.
Q. Well, that would have been a follow-up question.
A. Sorry.
Q. So the follow-up question is, have you ever hired prostitutes or escorts?
A. I did once, yes.
Q. And when was that?
A. Probably eight or nine years ago.
Q. Would that have been while you were engaged to Ms. Specht?
A. That would have been before.
Q. So never during your engagement with her did you hire --
A. No, sir.
Q. -- any prostitutes?
The behavior that we've gone -- been going over, is that -- is that consistent with your Christian faith?
A. No. I have made a lot of mistakes.
Q. Have you ever made any mistakes with girls under 17 years old?
A. No, sir.
Q. Have you ever invited any girls up to your room that were under 17?

A. No, sir.
Q. Have you ever invited any girls up to your room that looked like they might be under 17?
A. No, sir.
Q. Okay. So for purposes of the record, how we were handling it, I'm going to shift now to the Monica Rial allegation. So we discussed the first two allegations, the incidents, the -- what did Ms. Denbow tell you was the issue with regard to Mrs. Rial?
A. She said, Do you recall being at an event with Monica, at a convention event, and eating a jelly bean that she had signed, and saying, now -- now I can -- well, Monica said, Why would you eat that, you know, you're going to get ink poisoning. And I, off the cuff, made a joke that, Well, now I can say I -- now I can say I ate Monica Rial.
Q. And that was the only thing that Ms. Denbow communicated to you?
A. Yes, sir.
Q. And did you think that was kind of silly?
A. Yes, sir.
Q. And did you tell Mrs. Denbow that you didn't mean anything by the jelly bean comment?
A. It was a -- yes. It was clearly a joke, and it happened in public in front of plenty of people. It

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was -- it was, dare I say, kind of like a show. You know, I mean, they're fans and they're all laughing and thought it was funny.

Q. And you understand that Mrs. Rial has accused you of a far more serious incident than --

A. I understand now.

Q. But that was not relayed to you by Ms. Denbow?

A. No, sir.

Q. Did you have any more conversations with -- with Ms. Denbow after that initial conversation on January 25th?

A. I'm sorry, would you repeat the question, please?

Q. Yeah. Did you have any more conversations with Ms. Denbow after January 25th?

A. I -- I don't remember if it was her, but at the end of that conversation, the first one, she said that they would be in touch with me. And I don't remember how much time went by, I don't think it was more than a couple of days, and they called me and basic -- and there was -- there was more than one person on the line, and they said, We've reviewed the situation, and you're being terminated from Funimation immediately.

Q. And did that come as a shock to you?

A. Yes, very much so.

Q. Did they say anything about why, other than the situation?

A. No. I -- I was -- I was a bit dumbfounded.

Q. And so there was no, We believe them and we don't believe you, nothing like that?

A. No.

Q. Now, did you -- was it anything other than you were terminated and that's it? When that phone call ended, did you ask them why?

A. Bear with me, Sean.

Q. Sure.

A. It was -- it was rather a blow.

Q. Sure.

A. And I think I -- I think I said I've worked for you for 20 years. I -- I can't believe, based on what you asked me about, that this is an appropriate action and that -- and I don't -- I don't remember them saying much of anything in response. And they're like, all right, bye. I mean, you know, I was a bit dumbfounded. You know, you feel like you've been hit by a truck.

Q. Now, did you talk to anybody at Funimation after this termination, talk to anybody about it?

A. Let me think. No.

Q. And so as far as you know, the -- the basis for the termination was the three incidences that they

raised?

A. That's all I was told about.

Q. Now, you would agree with me that Ms. Denbow did tell you not to reach out to any of the individuals and to talk to them, correct?

A. Yes.

Q. And -- and did you reach out to any of them after -- after the fact?

A. Yes. I was terminated, why -- why in the world -- why wouldn't I? Especially a woman that I'd been -- thought I was friends with for 20 years. And, in fact, all I reached out to do was to apologize and ask her what it was that -- that -- that I -- that I did.

MR. LEMOINE: I object as nonresponsive after yes.

Q. (BY MR. LEMOINE) Did you reach out to the -- to the -- the twins?

A. Nope.

Q. Did you reach out to Ms. XXXXXXXXX?

A. No.

MR. LEMOINE: Let's make sure we strike -- we take care of that.

Q. (BY MR. LEMOINE) Okay. And you sent an email to Mrs. Rial, correct?

A. Yes.

Q. Did she ever respond?

A. No.

Q. Did you text or try and call her?

A. No.

Q. When was the first time you would say that you understood that Mrs. Rial was raising the issue of some kind of, what she considered to be assault in your -- in your hotel room, in your hotel room? When did you first --

A. You mean the assertion --

Q. Right.

A. -- from 11 years ago?

Q. Yes.

A. The first time I -- well, if -- I mean, I'm sure you have all reviewed the -- the tweets and stuff.

The first week or -- or two, Monica made several very vague references online. I have a story. It happened to me. And people would ask, and she -- she wasn't really very specific for a week or -- or two. I can't remember. And it was during that period that I emailed her and said, I -- I've considered you a dear friend for 20 years, I'm so sorry if I ever did anything to offend you. Please tell me what it was. I didn't hear back from her. And then a short time after that

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was when she actually published, publicly, her account.
Q. And what is your understanding of what her -- her recollection of that event in your hotel room was?
A. I'm sorry?
Q. No, I don't want to do that. I'll do that later.
Now, did you talk to this termination with Ms. Hansell after it occurred?
A. Sure.
Q. And did she have any advice for you?
A. Not that I recall.
Q. Do you know if Ms. Hansell has any relationship with the -- the Kiwi Farms --
A. No.
Q. -- that we looked at in Exhibit 10?
A. No, not to my knowledge at all.
Q. And do you know if Ms. Hansell has a YouTube channel?
A. No.
Q. You don't know?
A. I don't think she does, but I don't know for sure.
Q. And, certainly, if she did, you wouldn't know about her commenting about this litigation --
A. No, absolutely not.

Q. -- on that YouTube channel?
We've talked about Rooster Teeth, we've talked about Funimation. Have you ever been investigated for your behavior at any other company or business that you ever worked for?
A. Not to my knowledge.
(Exhibit 1 through 9 marked.)
Q. (BY MR. LEMOINE) All right. I'm going to hand you a binder that I've pretabbed with Exhibits 1 through 9.
A. Okay.
Q. Right now Exhibits 1 through 8 are in there. I'll give you 9 when we get -- when we get through it.
A. Okay.
Q. And I'm giving your attorney Exhibits 1 through 8, as well.
You talked earlier in the deposition about kind of this firestorm that kicked off about the same time that Dragon Ball came out. Do you remember that?
A. Yes, sir.
Q. Turn to Exhibit 1. I'll represent to you that Exhibit 1 is a tweet that I pulled off of the internet from a person that uses the Twitter handle @actuallyamelia. Do you recognize this tweet?
A. I'm sorry, say that again, please. I was

reading it, I'm sorry.
Q. All I'm saying, I'm going to represent to you I pulled this off of the internet and it's a tweet, I understand, that may have kicked off this firestorm about you. Are you with me so far?
A. Okay.
Q. Looking at Exhibit 1, is this the tweet, or do you know?
A. I don't know.
Q. Do you recall looking at the tweet back in January of 2019? Did you know it came --
A. The only tweet that I remember was one that said, Sorry to bring this up on the day the Broly movie is -- is being premiered, but I think it's time that Funimation stop casting Vic Mignogna for his sex -- for his misconduct, I think was the word they used.
And shortly after that, they started the hashtag and, like I said, it just kind of picked up steam.
Q. All right. And was the tweet on somebody's Twitter that you were following, or is that something --
A. No. No, sir.
Q. -- somebody told you?
A. Just somebody. There are lots of people out there.

Q. All right. And so after that, did -- did you agree that it kind of became -- it went viral?
A. I suppose, yeah.
Q. Do you know why it went viral?
A. (Witness nods.)
Q. I mean, is there something about anything that you've done over the past 20 years in the voice acting community that would lend credence to people thinking that maybe you were a sexual assaulter?
A. No. There are an awful lot of fans out there who are really desperate for attention, and they often like to talk about people to get it.
Q. And so your theory is that they make up stories about you sexually assaulting them to get attention?
A. Absolutely.
Q. Wouldn't it be better to say 'I had sex with Vic' to get attention, as opposed to say 'Vic assaulted me'?
A. Oh, I'm sure, give it time, or if you haven't seen it, I'm sure somebody out there would say that.
Q. But -- and that may or may not be true, right, you've -- you have had sex with --
A. Consensually, yes.
Q. In fact, you've had sex with so many people consensually, you're not sure what the number is. And

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when I say people, I'm talking about people at these conventions, right?

A. No.

Q. Do you know the number?

A. No. But it's not all at conventions, is my point. I don't do that very much at conventions.

Q. Where do you reserve that behavior for?

A. Where I choose.

Q. If you look at the bottom of Exhibit 1, I believe this is the first reply ever to this Amelia tweet, and she says, I've heard hundreds of story about what creepy is, and I'm always floored he gets -- still gets invites.

Would you agree with me that that is defamatory?

A. Sure.

Q. All right. And you -- whatever definition you have of defamation, you would say that's defamatory?

A. Sure.

Q. Do you have any evidence, any proof, any indication that any of the defendants had anything to do with someone putting a tweet out about you on January of -- January 16th, 2019?

A. I do not, no.

Q. And do you blame them for this tweet going out?

A. I have no --

MR. BEARD: Objection, form.

A. I have no reason to.

Q. (BY MR. LEMOINE) Okay. And you would agree with me that this -- the tweet going out harmed your reputation?

A. Not necessarily. Not at first, it was a cumulative thing.

Q. Kind of a death by a thousand cuts? Have you ever heard that phrase?

A. I have. Yeah, that's probably a good example.

Q. All right. Turn to Exhibit 2. Are you familiar with an online magazine called Polygon?

A. I wasn't until -- until this came out.

Q. All right. And are you familiar with the Polygon article written on January 25th, 2019, titled Dragon Ball Super: Broly Voice Actor Responds to Sexual Harassment and Home -- Homophobia Claims?

A. Uh-huh.

Q. You've read it before?

A. I -- I -- I probably did, yes.

Q. And when you read it, did you -- you didn't think there was a whole bunch of things in here that are false?

A. Yes.

Q. And when you read it, you thought there was a whole bunch of things in here that are defamatory?

A. Yes.

Q. All right. Have you sued Petrana Radulovic?

A. Not yet.

Q. Do you recall if -- I'm going to say Mrs., but I could be wrong, Radulovic, did she reach out to you to speak on this particular article --

A. I don't recall.

Q. -- do you remember?

All right. Would you agree with me -- well, did anybody email this -- a link to this article to you and say, Did this happen, or how did you find --

A. Well, I -- again, your friends tell you things that are going on, and friends of mine told me that this had been released.

Q. All right. Would you agree with me that this article being released on the internet hurt your reputation?

A. Sure.

Q. Do you blame any of the Defendants for the release of this article?

A. I can't answer that. I mean, I -- I don't know. At this point in time, I don't know whether any of them had anything to do with this article or not.

Q. Okay. If you would turn to page 3 --

A. Yes, sir.

Q. -- on Exhibit 2. You flipped over to Exhibit 3.

A. Oh, did I go too far? Oh, I'm sorry, I went to Exhibit 3 instead of page 3.

Q. Right. So page -- page 2. Oh, I'm sorry, it should be page 3.

A. Okay.

Q. It's Exhibit 2, page 3. Are you with me?

A. Yes, sir.

Q. All right. The last sentence on -- on page 3 reads, Mignogna said he will stop his physical interaction with fans as a result.

Is that a -- is that a statement that you made?

A. Yes. No, actually -- actually, no. The statement that I made was I intend to alter my interactions with fans moving forward.

Q. Okay. And have you done that?

A. Yes, I have.

Q. And do you still hug and kiss your fans?

A. No.

Q. Do you hug them at all?

A. They hug me, occasionally, and I -- it's funny,

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because as this has been happening in the events that I've attended since then, it -- I have never hugged anyone or asked them to hug me, but if a fan, who is clearly an adult, says, can I give you a hug, I will look at my handler, who is right here, arm's length away, witnessing everything, and say, Did you hear that she requested a hug? And I will usually do kind of a one little, one hand thing.

Q. And -- and do you restrict that to adults?

A. Yes.

Q. Meaning you don't hug children anymore?

A. No.

Q. And you don't kiss on children anymore?

A. No.

Q. Do you agree with me that's kind of creepy, right?

A. No.

Q. Not creepy?

A. Not when they ask you.

Q. I mean, is there an age limit in which a child can ask you to kiss and hug on them and you say that's creepy?

A. You see, when you say kiss, it sounds like something sexual, but somebody who is kissing a child on the forehead or the cheek as a -- as a symbol of

kindness or appreciation, is not meant in any sexual way.

Q. Besides yourself, do you know any 50-year-old men that kiss children on the cheek or forehead that aren't their children?

A. I'm sure there are many.

Q. I'm just asking if you know one.

A. No. I never thought to need to keep a record of that. I don't.

Q. All right. Turn to page 4. Second full paragraph, last sentence. It starts, Organizers at conventions. Are you with me?

A. I'm sorry. Yes, sir, go ahead.

Q. Organizers at conventions, meanwhile, she heard stories of unprofessional behavior such as oversetting his panel time and yelling at staffers.

Any truth to that?

A. Occasionally.

Q. And when you say occasionally, that happened every convention, every other convention?

A. No. Occasionally, not every time.

Q. It's not -- not a pattern of --

A. Absolutely not.

Q. Okay.

A. I don't think I would be invited to 40 events,

30 or 40, or however many events that I've been invited to over the years, if -- if I -- if that was a regular pattern. There are exceptions to that when you -- when you interact with people or you discuss expectations leading up to an event, and the expectations are not met and it causes problems, it can be frustrating. I have also apologized to conventions and organizers for getting frustrated.

Q. What is Discord?

A. I don't know.

Q. You never heard of Discord?

A. I -- I think it's an online thing.

Q. Is it not -- is it like some kind of app or something?

A. I don't know.

Q. All right. Look at the third paragraph on page 4.

A. Uh-huh. Wait. Page -- okay. Go ahead.

Q. The second sentence in the third paragraph says, Leaked screenshots revealed that Mignogna took to Discord for his private fan -- fan club, the Risembool Rangers, last Saturday to encourage his fans to counter the accusations. The #istandwithvic rose in response.

So my first question is, do you recall getting on some kind of online chat with your private

fan club?

A. I did a group -- I did a group chat, yes.

Q. And that was prior to releasing your tweet, a tweet about the allegations? Are you following me?

A. Which tweet?

Q. Fair point. So -- and see if I got the timeline right, you tell me. My understanding is there was a tweet on January 16th, 2019 when Dragon Ball: Broly was released?

A. Yes, sir.

Q. That's the tweet that kind of erupted about you, correct?

A. I assume so.

Q. All right. You issued a tweet on January 20th, 2019, basically apologizing for offending anybody, and defending yourself?

A. Yes, sir.

Q. Does that sound right?

A. Well, apologizing.

Q. Okay.

A. I don't remember defending myself for anything. I apologized for any unintended offense.

Q. Right. And then -- but prior to issuing that tweet, you went -- went online somehow with your online fan club to talk to them about what was going on?

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A. Uh-huh.
Q. And -- and one of the things that you were trying to do was rally the troops to defend you online. Do you agree with that?
A. No, sir.
Q. Well, why not, what's wrong with that? Why shouldn't you get on the --
A. No, what I did was -- if I may be clear, what I did was I encouraged them to speak of their positive experiences. Because there were people online throwing a bunch of negative experiences around, and I felt pretty confident there were a lot more positive -- a lot more positive experiences than there were negative ones, and I encouraged people that had positive experiences to speak up and be heard.
Q. Right. You went and rallied your troops?
A. I encouraged --
MR. BEARD: Objection, form.
A. -- them to speak positively. I don't have troops any more than the people against me rally people against me.
Q. (BY MR. LEMOINE) How many -- how many people are in your fan club that you spoke --
A. I -- I don't know the exact number. I -- I -- I don't know the exact number, actually.

Q. Would you agree with me that after you had this chat, private chat with your fan club, that the #istandwithvic arose?
A. I have no idea when that started or who started it.
Q. I'm going to show you what I've premarked as Exhibit 26.
(Exhibit 26 marked.)
A. I actually was troubled when that hashtag was started because I just wanted it to die down, and I felt like that was just going to exacerbate it, but that wasn't really anything I had any control over.
Q. (BY MR. LEMOINE) Okay. I'll make a representation to you about Exhibit 26, that this is pulled off of the Risembool Rangers fan club page.
A. Uh-huh.
Q. Are you familiar with it? And what the first screen is, I've done some blowups --
A. Okay.
Q. -- so we can see some of the language that you used.
A. Uh-huh.
Q. And then pages 2 and 3 are the actual screenshots just so somebody could check my homework. Are you with me so far?

A. Okay.
Q. All right. So February 19, 2019, before you issue a public tweet, you are tweeting -- you're communicating in your fan club group, right?
A. Yes, sir.
Q. And that group consists of people that like anime?
A. Sure.
Q. And a lot of women, young women in that group?
A. All different ages and genders.
Q. Okay. And one of the things that you wanted to make sure that they did was to do just whatever they could do to counter any negative communications out there about you, right?
A. Just to speak -- speak their own positive experiences.
Q. And not just speak their own positive experiences, you wanted them to do whatever they could do?
A. No, sir.
Q. Go online, start a petition?
A. No, sir.
Q. Dox people?
A. No, sir.
Q. None of that? You didn't want that?

A. No, sir.
Q. Why do this?
A. Why do what?
Q. Why -- why go online and have your fan base try and rally the troops?
MR. BEARD: Objection, form.
Q. (BY MR. LEMOINE) How about this, I'll just use your language: Why go online and say do whatever you can do to counter all these lies and negativity? Why -- why did you do that?
A. Because my reputation and work was under attack.
Q. Okay. Now, after January 19, 2019, the attacks on you were what, or what did you understand them to be? What -- what did you understand the attacks on your reputation and your work, what did you think they were -- they were?
A. I'm -- I'm sorry, I don't understand.
Q. I haven't done a good job.
A. What did I -- I don't --
Q. Was it that you were homophobic, that you were racist, that you were a predator? What was it that you were trying to get your fan base to counter?
A. The negativity, in general.
Q. All right. Any of your fans text or email or

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back-channel you in some way telling you what they were doing to counter these lies and negativity?

A. I don't recall that any of that happened.

Q. Have you ever used this tactic in the past where you encourage your fan base to go and counter people that were speaking negatively about you?

A. Not that I recall.

Q. Okay. So this is kind of a first-time event, right?

A. This -- yeah, this is a unique event.

Q. We're --

MR. LEMOINE: Let's go off the record.

THE VIDEOGRAPHER: And we're going off the record at 2:21.

(Break taken from 2:21 p.m. to 2:34 p.m.)

THE VIDEOGRAPHER: And we are back on the record for the beginning of disc number 4. The time is 2:34.

Q. (BY MR. LEMOINE) Mr. Mignogna, if you would turn to Exhibit 3 in the binder.

A. Yes, sir.

Q. I'll represent to you that it's a printout from the Facebook page of a woman named Jessie Pridemore.

A. Uh-huh.

Q. Are you familiar with Ms. Pridemore?

A. I've heard her name.

Q. Are you aware that Ms. Pridemore made some allegations?

A. Yes.

Q. What is your understanding of what those allegations were?

A. I think she claims that I propositioned her at an event in -- I don't even know, eight, nine years ago.

Q. All right. Did you ever tell anyone that Mrs. Pridemore was a con slut?

A. No.

Q. Do you know what a con --

A. I don't know her.

Q. Do you know what a con slut is?

A. Well, I can only assume, you know, based on the word itself.

Q. You've -- you've heard the word before, correct?

A. Well, I -- I know what -- I understand what the term slut means, and con, assumably, would be somebody at a con, convention.

Q. Right. But have you ever heard that word before, or are you just breaking it down because this is the first time you've heard it?

A. No, I have not, actually.

Q. Never heard it before?

A. No, sir.

Q. Okay. And so if Ms. Pridemore says that you slid your hands up in her hair and tugged her head back and said something to you [sic], you don't remember anything like that?

A. No.

Q. And don't know who Ms. Pridemore is?

A. No. I mean, I -- again, I know the name. And I think when you asked me about her before, I think I -- I said that I -- I -- I understand that she does -- she shows up at a lot of events, but I don't know her personally.

Q. Do you have a penchant for pulling the hair of female guests at conventions?

A. No.

Q. You don't put your hand up -- slide your hand up there and pull their hair, pull their neck back?

A. No.

Q. No idea where people might get that idea?

A. Well, there's a difference between doing something on a regular basis, and no idea where somebody would get that.

Q. Have you ever done that, have you ever, at a convention, in front of people, reached your hand up

behind a woman's hair and pulled her hair -- her neck, head back?

A. No.

Q. Okay.

A. Not that I recall.

Q. If you would turn to Exhibit 4. Are you familiar with a magazine called -- or an online group called the Anime News Network?

A. Yes, sir.

Q. Is that a fairly influential publication in the anime world?

A. I -- I don't know.

Q. Have you been mentioned in it before in a positive manner?

A. I don't even know, actually.

Q. Have you ever --

A. I've not really followed it.

Q. Have you ever read it before?

A. No, sir.

Q. All right. Were you aware that on May 30 -- or January 30th, 2019, there was an article printed in the Anime News Network online titled, Far From Perfect: Fans Recount Unwanted Attention from Voice Actor Vic Mignogna?

A. Yes, sir.

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Q. Did you read it when it came out?
A. I don't know if I did in its entirety, no.
Q. Do you know the author, Lynzee Loveridge?
A. No.
Q. Are there things contained in Exhibit 4 that you consider to be defamatory?
A. Yes.
Q. You would agree with me that the statements made in the Anime News Network article about you have damaged your reputation?
A. Yes.
Q. Do you see anything that any of the Defendants in this lawsuit have done with the publication of this article?
A. I don't know. They could have. I don't have any knowledge either way.
Q. If you would look on page 1 of Exhibit 4, third full paragraph.
A. Uh-huh.
Q. About the middle of the page it says, The thread quickly spread with over 4,000 retweets at the time of this writing and over 400 comments, many relaying their own negative experiences, including unwanted and unsolicited physical interaction from the Full Alchemist voice actor. Did I read that correctly?

A. Yes, sir.
Q. And you are the Full Alchemist voice actor?
A. I suppose so.
Q. And you agree with me this article is written about you?
A. Yes, sir.
Q. Okay. Do you disagree with that, that -- or, sorry, strike that.
Do you agree with me that that particular thread accusing you of things on January 16th spread like wildfire?
A. I assume so.
Q. Do you attribute anything that any of the Defendants did, to it spreading like wildfire?
A. I can't answer that. Possibly. I don't know.
Q. Would you agree with me that kissing 14-year-old girls on the face, whether it's consensual or not, is really not appropriate for a 40- or 50-year-old man?
MR. BEARD: Objection, form.
A. I would say a lot depends on context.
Q. (BY MR. LEMOINE) Okay. When is it -- what is the context in which a 40- or 50-year-old man kissing a 14-year-old girl is appropriate?
A. Well, if it is requested, if the -- if the --

in the past, this is the way I felt about it. I apologized for this, by the way. I apologized for not really considering, you know, that while there may be 500 people who appreciate that kind of kindness, there may be a few that don't.
When they -- when they're visibly emotional or upset, and you're wanting to be comforting and kind to them, all of these things happened in full public view of many people standing around, shooting videos, taking pictures. It wasn't sexual in any way, it wasn't private or sadistic or weird in any way. It was -- it was literally meant as an act of kindness.
Q. Right. So if you would turn to page 3 of Exhibit 4. Page 3, look at the bottom.
A. Two. This must be three.
Q. Three.
A. Uh-huh.
Q. So top photo, that's a picture of you --
A. Uh-huh.
Q. -- kissing a --
A. Uh-huh.
Q. -- woman, perhaps girl, in 2014. That would have been fairly regular for you to kiss women on the side of the face like that?
A. No, actually, it wasn't regular at all.

Q. That was irregular?
A. Yes.
Q. Do you even -- you don't remember this photo, do you?
A. No.
Q. Okay. So how do you know it's irregular?
A. Because I know how often I do it, and it doesn't happen very often.
Q. And when you say very often, you're talking about it happens less than 50 times at convention?
A. I don't count, sir, I'm sorry.
Q. So then how do you know it's not often if you don't count?
A. Because if it happened often, I would know that it was pretty often.
Q. You would agree with me that it was happening often enough that people were commenting on it and -- online for years, weren't they?
A. Yes.
Q. Okay.
A. I agree that people were commenting on it, certainly.
Q. And even though people commented on it in a negative light, you continued to do it, right?
A. Yes.

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Q. Do you ever give your phone number out to girls under the age of 15 and 16?

A. No, sir, not that I recall at all.

Q. Be no reason to do that, right?

A. No, sir.

Q. Do you ever give out your email to girls under -- under the ages of 15 and 16?

A. My email is very public, sir. I receive lots of emails from fans.

Q. Do you correspond privately with women under the age of 16?

A. Define correspond.

Q. Email, talk to them.

A. Fan letters?

Q. Yeah. Sure.

A. Sure, I'll write back and say, thanks so much, I'm so glad you're enjoying my work, I'll look forward to meeting you some day at a convention.

Q. Is that pretty much a standard response?

A. Yes, sir, very standard.

Q. And then this -- this chat, is there some kind of private chat room where you can chat with your fans?

A. Sorry?

Q. Is there some kind of private chat room that you use to chat with your Risembool Rangers?

A. Well, the Rangers fan club has a chat room. There's nothing private about it, anybody can join it. And I -- I don't go in there more than once or twice a year, actually, just to say hello and -- you know, I mean, when people form a fan club for you, you want to let them know you appreciate that and say hello occasionally.

Q. Who -- who runs the Risembool Rangers? Is there somebody that runs the website, keeps it up?

A. Well, there -- there is -- there is a woman who runs the website, and there is -- there are several, as I mentioned earlier, moderators, who just kind of, you know, moderate chat rooms and kind of administrate things. It's pretty loose.

Q. Does your mom have any role in dealing with this Risembool Rangers website?

A. To some degree. I -- I don't know exactly to what degree.

Q. Does she have a nickname that's associated with that?

A. I believe she likes to be called the Matriarch.

Q. Would you agree with the proposition that at least 40 percent of the people in Risembool Rangers are under age?

A. No, sir.

Q. And why do you disagree with that?

A. Because I have no idea.

Q. So it could be more?

A. Or less.

Q. Or less. Is there any kind of age entry that a person has to put when they get into -- when they become a Risembool Ranger?

A. No, sir. It's a fan club. People who are fans of something join voluntarily.

Q. If you would turn to page 6 of Exhibit 4.

A. Uh-huh.

Q. Second full paragraph, where it starts with Mignogna.

A. Yes, sir.

Q. I want to skip down, one, two, three -- five sentences. It says, While researching this article, I kept learning of more conventions that supposedly blacklisted Mignogna from ever returning, yet any attempts to reach out to a long-time staffer at each event were met with silence.

Do you know anything -- can you confirm or deny that you've ever been blacklisted from a convention?

A. No, sir.

Q. Now, would you agree with me that you were

given the opportunity to comment for this particular article written by Anime News Network?

A. Yes, sir.

Q. And you declined?

A. Yes, sir.

Q. And why did you decline?

A. Because it occurred -- because it seemed to me very clear that they were not interested in -- you know, in -- in just relaying truthful information. It seemed like they were more interested in -- in getting clicks and -- and promoting rumor.

Q. Did you talk to anybody about what the article was going to be about? Did they tell you or send an email?

A. A reasonable person could assume what the article was going to be about, considering that they wrote it in the midst of this social media upheaval.

Q. Okay.

A. And I was right, it was about exactly what I thought it would be about.

Q. And -- and you would agree with me this -- this particular article was -- was very damaging to your reputation?

A. It was damaging.

Q. I mean, and after this article came out, you

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started losing invitations to conventions, didn't you?

A. Not -- not -- a few, but -- but not, you know --

Q. Well, you --

A. A few, but not -- not -- not a lot.

Q. What would a lot be?

A. Well, what I -- what I mean to say is that my recollection is that I started losing more events after Funimation and Rooster Teeth terminated me, and after Jamie and Monica came out and -- and started posting publicly.

Q. Well, how many -- how many conventions did you lose, if you know?

A. I -- I don't remember. I don't remember offhand.

Q. Were Jamie and Monica -- this article is written on January 30th, 2019. Were Jamie and Monica, were they posting prior to this time, or do you know?

A. I don't know.

Q. Okay. If you turn to Exhibit 5. Are you familiar with an online blog called The Dao of Dragon Ball?

A. No, sir.

Q. You don't know if that's popular with Dragon Ball fans or not?

A. It may be. I don't know.

Q. Now, were you aware that The Dao of Dragon Ball wrote an article about you?

A. I'm sorry?

Q. Were you aware that The Dao of Dragon Ball wrote an article about you?

A. I -- I don't. This period was very, you know --

Q. Okay. So --

A. I -- I don't know, specifically.

Q. All right. As you sit here today, have you ever read this Exhibit 5?

A. Not that I recall.

Q. So you don't know what it says --

A. No, sir.

Q. -- about you one way or the other?

A. No, sir.

Q. And so you can't comment on whether or not you blame any of the Defendants for any of the information in it?

A. No, sir.

Q. You don't even know whether or not the -- the article was defamatory?

A. I don't. I don't, but I -- I would lay odds that it is.

Shall we read it and find out?

Q. I'll represent to you that this article was -- was posted online on February 1, 2019. When you print it out, for whatever reason, it didn't print out the date.

A. Okay.

Q. Are you with me? All right. So I want to turn to page 3 of Exhibit 5.

A. Okay.

Q. All right. First full paragraph, second sentence reads, However, numerous allegations of sexual assault have shadowed Mignogna's career and continue up to today. During the research for this article, over 100 independent allegations surfaced dating back to 2013.

Do you agree with that statement?

A. No, sir.

Q. You don't think there's been numerous allegations of assault that have shadowed --

A. It didn't say numerous, it says over 100. I don't agree with that. I've not seen a list of 100 names.

Q. Does it make a difference to you if it's 100 names or 10?

A. Makes a difference to them. That's why they

said 100; it sounds much more impressive.

MR. LEMOINE: Objection, nonresponsive.

Q. (BY MR. LEMOINE) Does it make a difference to you if you're accused of 10 -- 10 ti -- 10 allegations of sexual assault or just 100, or 100? Does it make a difference?

A. Yes, it does.

Q. And why does it make a difference?

A. Because in a world of four billion people, there are going to be people that don't like you, for whatever reason, or have a problem with you, and the more people there are, the more troubling it is.

Q. Are you aware of any other voice actors that have -- have had numerous allegations of -- of improper behavior against them?

A. Yes.

Q. Like who?

A. I'm not going to name them.

Q. Fair enough. So you're not the only one?

A. No, sir.

Q. I assume you're familiar -- familiar with the Me Too Movement?

A. Yes, sir.

Q. I take it you -- you also believe that sexual assault victims ought to be heard?

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A. Yes.
Q. And certainly don't want to silence them in any way, right?
A. No, sir.
Q. Would you agree that most of your fans tend to be female?
A. No, sir.
Q. If you would turn to page 8. Second -- or first full paragraph, starts with another --
A. Yes, sir.
Q. -- or another. If you skip down four sentences, it reads, This issue is exacerbated by his age, as any 56-year-old who spends so much time interacting with young girls on a website without parental supervision and who then embraces and kisses these children at conventions is going to raise eyebrows, even if innocuous.
Do you agree with that statement?
A. No, sir. This is completely inflammatory.
Q. You don't think that it's odd that a 56-year-old man embraces and kisses children at conventions --
A. No, sir.
Q. -- is going to raise eyebrows?
A. Sorry?

Q. What's inflammatory about the statement?
A. If I may.
Q. Sure.
A. "So much time." How much is that? Who's to determine how much so much time is. "On a website without parental supervisor." The person who wrote this does not know any of that factually. This is meant to inflame.
Hold on. Let me please finish. "Embraces and kisses children." Yeah, like every other voice actor does in public for photo ops at conventions. It's not seedy and dirty and pervy. And the vast majority of the people, many of them that I have met over the years, have no problem whatsoever with it. There is a small contingent that does, and I apologized to those people in the tweet where I said, I -- I accept that I need to be more mindful that not everybody is open to that kind of interaction.
Q. And do you blame the Defendants for people who have had that type of interaction --
A. No.
Q. -- or that reaction to this?
A. No.
Q. But you'd agree with me that that type of reaction and the fact that it's being talked about has

damaged your reputation?
A. Please rephrase.
Q. Yeah. The fact that people have reacted negatively, whether it's true or not, that you kissing young girls, that has damaged your reputation, as we sit here today?
A. To a degree.
Q. All right. Look at page 9. Under the word allegations, are you familiar with a site called Vic Mignogna Horror Stories?
A. No, sir.
Q. First time you've ever heard of it, today?
A. Yes, sir.
Q. Didn't know that it ran for six years?
A. No, sir.
Q. Are you familiar with a Twitter #kickvic?
A. I certainly know of it, yes.
Q. Do you know when it started?
A. If memory serves, it started very shortly after January 16th, when the -- when the first tweets were put up, were posted.
Q. And do you blame any of the Defendants for that Twitter handle starting?
A. I don't know their involvement.
Q. Would you agree with me that Twitter handle has

gotten some level of notoriety in -- in your -- your community?
A. Sure.
Q. And would you agree with me that's also hurt your reputation?
A. Sure.
Q. Do you know who -- who created the #istandwithvic Twitter?
A. No, I don't, actually.
Q. Turn to page 17. Top paragraph reads, Even without definitive proof following the recent allegations in January, several conventions announced that Vic Mignogna would no longer attend their convention. For example, on January 28th, 2019, Planet Comicon in Kansas City announced that Vic had canceled his scheduled appearance.
Is that true?
A. Is what -- which part of it?
Q. Good question.
A. No, that's fine.
Q. My apologies. Did Planet Comicon cancel your -- announce that you were -- wait a minute.
Did you cancel your appearance to Planet Comicon?
A. No, sir.

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Q. Did Planet Comicon cancel your appearance?
A. Yes, sir.
Q. Did they tell you why?
A. No, sir.
Q. Have you ever spoken to any --
A. Well, I assume because of -- of what was going on, but I don't know.
Q. But nobody that runs Planet Comicon has told you why you weren't invited?
A. No, sir.
Q. If you look at the bottom of page 17, last -- last full paragraph, Likewise, the Rangerstop & Pop Atlanta convention announced on January 18th that Vic would attend a convention, that the fans sent them the allegations and requested #kickvic. The staff replied they had not heard these allegations before and investigates them. Then on January 28th, the staff cancels.
Is it true that Rangerstop & Pop Atlanta canceled your attendance?
A. Yes, sir. That was a -- this was a first-year convention, by the way. This was run by a friend of mine, Nakia Burrise, who -- well, she was one of the organizers of it. And -- and she had invited me, and then she called me to say that they were just kind of

really surprised by all these anonymous messages they were getting, and they really were afraid, you know, being a first-year event. And so, yes, they -- yes.
MR. LEMOINE: And do any of you --
Q. (BY MR. LEMOINE) Do you know how to spell that -- that lady's name?
A. I'm so sorry?
Q. Do you know how to spell her name?
A. Oh. Nakia, N-A-K-I-A, Burrise, B-U-R-R-I-S-E, I think. She was the yellow ranger in one of the incarnations of Power Rangers.
Q. And when you talked to Ms. Burrise, did she say that anything that any of the Defendants said or did was -- was why they were canceling that?
A. Not specifically, no.
Q. Did she imply that, it was something that one of the Defendants --
A. Not specifically, no. She didn't say any names.
Q. Okay. So looking on paragraph -- or on page 18 -- or, I'm sorry, Exhibit 5, page 18. Are you with me?
A. Yes, sir.
Q. Second full paragraph. This was followed on January 30th by Emerald City Comicon announcing Vic Mignogna's appearance at Emerald City Comicon has been

canceled.
Is that true?
A. Yes, sir.
Q. And did you talk to anybody at the Emerald City Comicon?
A. I did not speak with them. I spoke with one of my friends, my -- an agent of mine who was working with Emerald City.
Q. And who was that?
A. His name is Gary Hassen.
Q. And what did Mr. Hassen tell you?
A. Gary -- Gary told me that -- Emerald City is owned by a larger company that puts on several events. I believe the company is called Inform -- no, ReedPOP. There are two big companies that buy a lot of conventions. There's ReedPOP and there's Informa. And Emerald City, I believe, is owned by ReedPOP. And for the same reasons, they -- they told my -- my -- my -- they told Gary that -- that they had received anonymous, you know, negative accusations and -- and that they were canceling me.
Q. And did -- did Mr. Hassen relay to you that anything the Defendants did caused ReedPOP to cancel the -- that convention?
A. Not this specific convention, no, sir.

Q. Are you familiar with the concept of a broken staircase?
A. I'm sorry?
Q. Have you ever heard of a broken staircase?
A. No, sir.
Q. Did you know that you were mentioned on a website called Broken Staircase?
A. No, sir. What -- what is it?
Q. Turn to page 23 of Exhibit 5. If you look under Broken Staircase. Apparently, you're the third entry on the list for sexual misconduct with minors, physical boundary violations, verbal and physical sexual harassment, homophobia and anti-Semitism.
I take it you didn't know that?
A. No, I've heard that there was a list, and it's preposterous.
Q. And, obviously, you disagree with that?
A. Absolutely.
Q. But you would agree with me that being on that kind of list is damaging to your reputation?
A. Sure.
Q. Do you attribute anything to what the Defendants have done for you being on that list?
A. I don't know. I don't know what any -- I don't know what any actions that -- that I'm unaware of might

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be.

Q. Do you recall the date that you were terminated by Funimation?

A. Well, can I consult one of your exhibits?

Q. Sure.

A. Whichever -- okay. So the conversation with Tammi --

Q. January 25.

A. So I would guess it was on or about January 27, 28, I think, roughly.

Q. And that's when they called you and said --

A. Yes, sir.

Q. Okay.

A. Yes, sir.

Q. Are you familiar with Kara Edwards?

A. Yes, sir.

Q. And she is a voice actor in Dragon Ball Super?

A. Yes, sir.

Q. I forget. Adam Sheehan used to work at Funimation?

A. Yes, sir.

Q. Have you ever had any negative run-ins with Mr. Sheehan?

A. No, sir.

Q. Would it surprise you to learn that Mr. Sheehan

considered sexual assault allegations against you to be an open secret in the voice acting industry?

A. Yes, it would surprise me. All of my interactions with Mr. Sheehan were always very positive and friendly.

As we established early on in this deposition, I apparently am not very good at -- at assessing friends.

Q. If you turn to Exhibit 6. I will represent to you that it's a screenshot from Rooster Teeth's Twitter account.

MR. BEARD: Exhibit 6?

Q. (BY MR. LEMOINE) Are you familiar -- are you familiar with this tweet?

MR. BEARD: Hold on, Counsel.

A. I --

MR. BEARD: Exhibit 6?

THE WITNESS: It's this one.

MR. BEARD: All right. Got it. Well, you got the colored ones. We only got the black and whites.

Q. (BY MR. LEMOINE) I'll represent to you that this was sent out on February 5th, 19 -- I think you were told you were terminated by Rooster Teeth on February 4th of 2019. Does that sound right?

A. I believe you. I didn't see this, but I was

told about it.

Q. Okay.

A. I was in a pretty difficult state at this point.

Q. Anything on Exhibit 6 that you consider to be defamatory about you, obviously?

A. Sorry, I'm not the super fast reader.

Q. It's all right.

A. No, sir.

Q. Would you agree with me that even if it's not defamatory, it -- being terminated by Rooster Teeth in a public way, hurt your reputation?

A. Sure.

Q. Would you associate that termination with you losing invitations to any cons?

A. Possibly.

Q. Anybody ever tell you that, that because Rooster Teeth terminated you, we're not going to invite you to this con?

A. There were certainly conventions that told me that because I was terminated by Funimation and Rooster Teeth, so in the same sentence they included Rooster Teeth.

Q. As you sit here today, do you think that Rooster Teeth has defamed you in any way?

A. Not verbally, not publicly.

Q. Do you think privately they've defamed you in some way, that you're aware of?

A. Possibly. I -- I'm not aware of anything specific. But as you asked me earlier in the day, you know, terminating me without even so much as a conversation or any kind of an understanding of -- of -- of it was -- was pretty difficult.

Q. If you turn to Exhibit 7. Are you familiar with the Funimation tweet terminating you?

A. Yes, sir.

Q. Have you seen it before?

A. Yes, sir.

Q. And is this a true and correct copy of that termination?

A. Well, this is one of them.

Q. There was more than one?

A. Yes, sir.

THE WITNESS: Am I correct?

A. I'm sorry. May I consult my counsel? Is that okay? I'm just --

Q. (BY MR. LEMOINE) I'll represent to you -- I'm not trying to trick you.

A. Sorry.

Q. I'll represent to you that I took this from

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Funimation's page and cut it -- did a screenshot of it, and those are the --

MR. BEARD: I think if you look here --

THE WITNESS: Oh, there it -- I'm so sorry, it's below. That's the second tweet. The -- I was just looking at the first one. So underneath it is another one, and then a third one, right?

Q. (BY MR. LEMOINE) Right. Okay. So -- so let me break it down into components.

The first thing is, do you consider the top part of Exhibit 7 the big tweet, on February 11th, 2019, that says, everyone, we want to give you an update on the Vic Mignogna situation. Following an investigation, Funimation's recast Vic Mignogna in Morose Mononokean Season 2. Funimation will not be gauge -- engaging Mignogna in future productions.

Do you consider that to be defamatory?

A. No, sir, that's not the big tweet. The big tweets are the follows.

Q. The -- the two smaller ones?

A. Right.

Q. And when I say big tweet, I'm just saying it's physically bigger.

A. Yeah, I was going to say -- okay.

Q. Right.

A. Big as in important.

Q. Right. So --

A. Sorry.

Q. Right. So it's the two tweets below what we call the second and third tweets, that you would consider to be defamatory, correct?

A. Yes, sir.

Q. And the reason you consider them to be infammatory is -- defamatory is what?

A. Because they clearly imply that -- that I am guilty of harassment, threatening behavior. There's no -- there's no proof or evidence of -- evidence of that. And if I'm -- if I -- if I'm not mistaken, Funimation, on the phone, told me that they were not going to be releasing any public statement. When they terminated me -- I should say Sony. In the conversation, they called me and terminated me, they said they would not be releasing any public statement. And shortly after, I can't remember, a week, two weeks after, maybe a week, they started -- they released these tweets publicly.

Q. Were there any other tweets other than these tweets?

A. Not that I'm aware of.

Q. Looking at the second and third tweets, is

there anything that you think is untrue about those statements?

A. Well, as I -- as I said, it's a matter of implication.

Q. Okay. But on its face, there's nothing that -- that you would point and say, that statement that Sony doesn't condone harassment of any kind is -- is not -- it's untrue?

A. I'm sorry, please say that again.

Q. Right. As you sit here today, do you think Funimation or Sony condones harassment?

A. Of course not.

Q. If you turn to Exhibit 8. Are you familiar with a magazine called --

A. Oh, that's awesome, what a great picture.

Q. Are you familiar with a --

A. No, sir.

Q. All right. Let me get my question out.

A. Oh, I thought you just asked, and were repeating it, I apologize.

Q. Are you familiar with a magazine -- online magazine called Gizmodo?

A. No, sir.

Q. Have you ever seen or read the article from Gizmodo, written on February 19th, 2019, titled one of

biggest -- One of Anime's Biggest Voices Accused of Sexual Harassment?

A. No, sir.

Q. Never seen it before today?

A. No, sir. I was told it was -- it existed. I have not read it myself.

Q. So you haven't -- you -- I could go through this, but you can't comment one way or another in terms of as we -- strike that.

Right now, do you know whether or not this article is defamatory about you or not?

A. I could lay really good odds.

Q. Okay. Do you know if -- turn to page 2.

Do you know Beth Elderkin?

A. No. I mean, I know the name, but I don't know her personally.

Q. Did Ms. Elderkin reach out to you to comment on this particular article?

A. Yes, she did.

Q. And did you comment?

A. I did.

Q. And did she -- how did that -- was it online -- strike that.

Did you email each other, or was it a phone conversation?

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A. She emailed me, and I replied.
Q. And so did she -- in the email, did she list out the allegations against you --
A. Yes.
Q. -- and actual responses?
A. Yes. And I replied to them, and she picked and chose my replies to put into the article, and omitted portions of what I -- of my replies.
Q. Did -- do you still have the copy of that email?
A. I -- I'm sure I -- again, it's -- it's -- I'm sure it's in an -- an old email folder.
Q. Do you know if you gave it -- provided it to your attorneys at some point?
THE WITNESS: Did I -- had I even retained you at that point?
Q. (BY MR. LEMOINE) It's February 19th.
MR. BEARD: If we have it, we'll --we'll produce it. I think I might.
A. Are you asking, sir -- are you asking about my reply or are you asking about her email to me requesting a comment?
Q. (BY MR. LEMOINE) So I didn't know that -- how you communicated with her.
A. She wrote me unsolicited, said I'm writing an

article for io9 and I'd like to ask if you would comment on these issues. And I commented on them, bullet point --
Q. Right.
A. -- and sent it back to her.
Q. And was it a pretty lengthy email that she sent to you?
A. Yes, sir.
Q. Okay. And so you went through each of them and --
A. Yes, sir.
MR. BEARD: Counsel, if I might, the -- I think all that has -- has been released out on Twitter, both the emails she sent to Vic and Vic's response.
MR. LEMOINE: Okay.
MR. BEARD: I think, yeah.
MR. LEMOINE: And I'm not -- I'm not implying that you didn't produce it, I just didn't -- hadn't seen them.
MR. BEARD: Yeah. No, I'm just trying to -- I'm trying to rack my brain to know if I did. It was -- if it was, it was real early when this stuff was going on. I don't think so.
Q. (BY MR. LEMOINE) Regardless, you -- it was -- there was no oral conversation with Ms. Elderkin?

A. No, sir.
Q. Okay. So -- so we could go look and we'd get the email and see exactly how you responded to whatever she wrote.
All right. If you turn to page 6. Top paragraph reads, When reached by io9 to comment, Mignogna said that he had never forced himself on anyone, claiming that any and all encounters I have ever had have been 100 percent consensual. He gave specific responses to the accusations present in this article, denying some and providing his own version of events on others. Did I read that correctly?
A. Yes, sir.
Q. And you haven't read the articles, you don't --
MR. BEARD: Counsel, sorry, I got -- I got lost. Where -- where is that?
MR. LEMOINE: Page -- page 6.
MR. BEARD: Page 6. Okay.
MR. LEMOINE: Very top.
MR. BEARD: Yeah, okay, sorry, got it.
Q. (BY MR. LEMOINE) But you haven't gone through this article to figure out whether or not she accurately portrayed your commentary, your -- your responses?
A. I was told that -- who -- by people who knew what I had responded to her and then read the article,

that -- that they -- that she did not print my complete responses.
Q. Right. Did anyone help you craft your responses?
A. Yes.
Q. Was it an attorney?
A. No.
Q. Who was it?
A. It was a man-and-wife couple named Jessica and Cliff, Jessica and Cliff -- I don't know their last names. They're PR, you know, kind of -- just kind of help people, and somebody -- actually, it was -- I don't even -- I -- I think Todd Haberkorn --
MR. BEARD: I'll get you that -- those names.
A. -- referred them to me.
Q. (BY MR. LEMOINE) Let me ask a few follow-up questions and see if I jog your memory a little bit.
Have you ever used Jessica and Cliff's services before?
A. No.
Q. Todd Haberkorn is the person who introduced you?
A. Yes. Well, I -- may I -- may I --
Q. Sure.

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A. -- revise that? What I mean is I understood that they had helped him craft a statement. I was -- didn't know what to do or how to respond to everything that was happening and -- and I -- so I reached out to them to see if they could help me, as well. Todd did not call me and say, This is their name and number.

Q. Now, did you know Jessica and Cliff outside of that?

A. No, sir.

Q. That's the first time you had ever met them?

A. Yes, sir.

Q. And so that would have been sometime in 2019?

A. Yes, sir.

Q. And do you know, were they -- are they local to Dallas?

A. No, sir, I believe they're in Florida.

MR. BEARD: Florida.

Q. (BY MR. LEMOINE) And did you pay them?

A. Yes, sir.

Q. And did you meet them in person to discuss the issues?

A. No, sir.

Q. Talk to them on -- talk to them on the phone?

A. Yes, sir.

Q. And would you have emailed with them?

A. I probably did.

Q. Were there multiple drafts of your response that you-all went over?

A. Yes, probably.

Q. And do you know -- and would you have emailed those back and forth?

A. Between them and me?

Q. Yes.

A. Yes, sir.

Q. And do you know, were those -- did you save those drafts on your computer somewhere?

A. No, no more than you save a rough draft of something, you save the final draft, you know, and you work on something and --

Q. But you would have edited the draft, sent it to them; they would have edited and sent it back?

A. Actually, no. More than -- more times than not they would write something, and then I would -- they would send it to me, and then I would make adjustments to it that I felt were appropriate.

And if I may say, there were things that they actually suggested that I never posted, I never -- like I never ever released. Like we talked about something, and then I just didn't feel good about releasing it at all.

Q. Meaning there was personal information that you didn't want to discuss?

A. No, no, no. No, meaning that they wrote up something that I didn't want to release, that I -- I didn't want to -- I didn't want to get out. Not personal information, just didn't want to exacerbate the situation, you know.

Q. If you look at exhibit -- stay on -- still on Exhibit 8, page 7.

A. Yes, sir.

Q. There's a reference to a woman named Rachel?

A. Yes, sir.

Q. Do you recall -- do you know who that Rachel is?

A. No, sir.

Q. All right. If you look at the -- on page 7, the second full paragraph, it says, Mignogna acknowledges events that happened, including that he had rubbed the back of Rachel's thighs, but said the encounter was consensual.

You sure you don't remember who that is? Because, obviously, her name is not Rachel.

A. If I -- may I have a minute to read this?

Q. Sure.

A. Where is the -- where does Rachel start here?

Q. Page 6, last paragraph.

A. Yes, I believe that's Kara Edwards, and I think that I replied in my reply to -- you know, in -- in the email that I sent to -- to Beth Elderkin, I -- I believe. I believe. But in my reply, I -- I stated very clearly that many of the details of this were untrue.

Q. All right. If you would turn to Exhibit 8, page 9.

A. It's so funny to me.

Q. What -- what -- what's funny?

A. I'm reading this. So she has this horrific experience, and then a second situation, she agreed to come by my room briefly. Now, why would she do that?

I'm sorry. I -- I -- I didn't even -- like I said, this is -- some of this is still kind of fresh.

Q. If you look at the bottom of page 7.

A. Yes, sir.

Q. Last paragraph. It says, Rachel says she did not report the incident to hotel management or to police because she feared Mignogna would attempt to negatively impact her career. He's very well-known in the industry, very, very powerful in our industry, she said.

Would you agree with the statement that you're very, very powerful?

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A. No, sir.
Q. And why do you disagree with that?
A. Because it's not true. Voice actors are a dime a dozen, and --
Q. So you're --
A. I have no power or influence. I audition for roles for 20 years just like everyone else. I get some, I -- I don't get many others.
Q. Turn to Exhibit 8, page 9. Third full paragraph.
A. Yes, sir.
Q. This is in 2014, a professional cosplayer, Diana. That's not her real name.
Do you know who it is?
A. I'm fairly certain it was someone at an event in Hawaii. I'm fairly certain it was at an event, but I'm not -- I'm not sure, again. But I believe it was at an event.
Q. And when the -- when Ms. Elderkin was provided the information, did she use the actual names?
A. No, she did not.
Q. She used -- okay. So pseudonyms of some sort?
A. Yes, sir. And, of course, when I replied, I -- I used the names of the people I believed these -- they were. Of course, she didn't publish that, but --

Q. Are you aware of anyone being harassed online that has come out against you in this -- during this controversy?
A. No. Not personally, no. I do know that people that have defended have been viciously harassed. I do know that.
Q. All right. If you turn to page 15.
A. Sorry?
Q. Page 15.
A. Fifteen?
Q. Yep.
A. Yes, sir.
Q. Top paragraph, four sentences down, it starts, but an email shared with io9 also showed Mignogna --
MR. BEARD: Wait one second.
A. Hold on, I'm sorry. I couldn't quite make out what you --
MR. BEARD: Okay. I don't see 15 now.
MR. LEMOINE: Exhibit 8.
MR. BEARD: Oh, Exhibit 8, page 15. My bad. All right.
Q. (BY MR. LEMOINE) Are you with me?
A. Yes, sir.
Q. All right.
MR. BEARD: Oh, yeah, sorry. Yeah, sorry.

Q. (BY MR. LEMOINE) First full paragraph, fourth sentence down, says, But an email shared with io9 also showed Mignogna three days later privately telling a fan how a certain voice actor turned to be hateful toward me. Mignogna mentioned that person by name.
Do you know who that is?
A. No. Three days later from what? I'm -- I'm trying to get a context here.
Q. Looks like it would be February 11th, based on context.
A. Harassment included -- oh, this is -- okay. So the context here is people being harassed, correct?
Q. Yes.
A. Or -- or somehow being messed with because -- right?
Q. Yes.
A. No, I -- I -- I don't know -- showed Mignogna three days later privately telling a fan how a certain voice actor had turned to be hateful toward me.
Well, I -- I -- that's -- I don't remember that, but I don't -- that certainly has happened. But I have never encouraged anyone to -- to do any -- anything hateful or negative, attacking, certainly not death threats.
Q. And anybody associated with you, do you know if

they've encouraged that type of behavior?
A. No, sir. I've heard -- I've heard people tell that they've received death threats, and I've also heard that every time they're -- they're put on the spot to produce said death threats, they never do. I don't know if that's true or not so I -- I -- I've heard the buzz, but I don't really have any personal knowledge.
Q. Right. If you turn to page 17. That block quote appears to me to be a quote from Ms. Specht, your former fiancee?
A. Yes, sir.
Q. First paragraph, last sentence. It says, I've had to face the reality that the loving, monogamous relationship I believed in and was devoted to never existed.
Do you agree with Ms. Specht's hindsight review of your relationship?
A. No. It certainly did exist at some point, but I -- I failed Michele miserably, and I deeply regret that.
MR. BEARD: While you're looking, two-minute break?
MR. LEMOINE: Sure.
THE VIDEOGRAPHER: And we're going off the record at 3:27.

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(Break taken from 3:27 p.m. to 3:37 p.m.)
THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 5. The time is 3:37.

Q. (BY MR. LEMOINE) Mr. Mignogna, I'm going to show you what I've premarked as Exhibit 9. And you can put that in the binder or keep it in front of you, it's up to you.

A. My name has an additional G in it, but --

Q. Oh, I'm sorry.

A. -- people have missed it for a long, long time, so it doesn't matter at all.

Q. My -- my apologies.

A. No, no worries. I just wanted to let you know.

Q. So I put together the timeline just to kind of show start to finish -- or not start to finish, but start -- you would agree with me that this firestorm kind of kicks off on January 16, 2019, right?

A. Yes, sir.

Q. And then by January 19, 2019 is when the GoFundMe announcement occurs?

A. I'm sorry?

Q. I'm sorry, February 19th --

A. Oh.

Q. -- is when the GoFundMe occurs?

A. If you say so. I don't remember dates, like, specifically, but, yes.

Q. Okay. And then along the way, you are losing convention invites, would you agree with that?

A. Yes, sir.

Q. Was there any other business besides invitations to cons that you lost, that you can point to?

A. Well, I mean, the -- there were at least seven or eight recurring roles at Funimation that I had been playing for many, many years, I lost those, and any future recording sessions of those shows. I lost the recurring character that I was playing for Rooster Teeth. And I'm sure there are, you know, other repercussions, you know, ripples that I might even never know about.

Q. And the Rooster Teeth termination, we don't know why that occurred, we just know it occurred, correct?

A. Yes, sir.

Q. And then the Funimation termination, we don't know why that occurred either?

A. Well, we can only assume, based on the -- the three stories that -- the three incidents that Tammi -- Tammi?

Q. Yes, Tammi Denbow.

A. Yes, sir. That Tammi asked about.

Q. Are you familiar with --

MR. BEARD: Excuse me, Counsel.

MR. LEMOINE: Sure.

Q. (BY MR. LEMOINE) Are you -- are you --

A. Yes, sir. Go ahead.

Q. Are you familiar with something called rumor panels?

A. No. In what context, sir?

Q. In the context of panel discussions at cons that are, I guess, called rumor panels.

A. No, sir. I did a panel many, many years ago at a convention about rumors about me, because I wanted to dispel them. They were baseless and without substance, and I -- and I knew that people had questions and I wanted to address them.

Q. Is that the only rumor panel that you've ever done?

A. Yes, sir.

Q. Do you know what con that was at?

A. No, not offhand. It was a long time ago.

Q. And -- and what was the purpose of the -- the rumor panel?

A. As I said, I -- I knew that there were rumors

and gossip online, and I knew that fans had questions about it, and I wanted to dispel the rumors.

Q. All right. I'll show you what we're going to mark as Exhibit 21.

(Exhibit 21 marked.)

Q. (BY MR. LEMOINE) I'll represent to you Exhibit 21 is a post on the internet I pulled off, or somebody pulled off, with a date of 4/20/2010, references a Tekkoshocon rumor panel.

A. Which is in Pittsburgh. Tekkoshocon is in Pittsburgh.

Q. All right. Does that one refresh your recollection, that that's what the rumor panel that you did was at the Tekkoshocon in Pittsburgh?

A. Yes, sir. I suppose, yes. I only did one, and I didn't remember the panel -- the convention, and this says Tekkoshocon, in which I know is a Pittsburgh convention, so I can -- I'm going to assume that's -- that's the one.

Q. All right. Are you aware of any other voice actors that have done rumor panels?

A. I don't know. There are hundreds of voice actors do hundreds of panels at hundreds of conventions. I don't know what their schedules are. I don't know what they do.

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Q. Okay. So you've never heard of anybody doing a rumor panel besides you?

A. I've never asked. I mean, I -- I've never inquired. I don't know.

Q. And so the rumor panel is designed for you to talk about rumors and address them; is that right?

A. Yes, sir.

Q. Okay.

A. Well, actually, if I may say so, it wasn't designed to be that type of panel. It was a normal Q and A session, and I ended up -- I think maybe somebody even might have asked a question about something and I answered it, and it kind of continued in a vein of, you've heard this, or, you've heard this, and it became that, but it wasn't, like, advertised that way.

Q. Do you recall that this rumor panel in Tekkoshocon addressed any issue of you being homophobic?

A. Yes, sir. It's outrageous.

Q. And that was -- and is that a rumor that has kind of dogged you even after that rumor panel?

A. Yes, sir.

Q. And does -- that you're homophobic, does that hurt your professional reputation?

A. Well, it certainly doesn't help it.

Q. And if you turn to page 2 --

A. And for the record, I am not remotely homophobic.

Q. Okay. Turn to page 2 of Exhibit 21. Third sentence down on the top paragraph, if you slide over, it reads, Vic also reveals that he encouraged Britt and her friends to attack cosfu and 4chan about these stories and that he set up a PayPal account which demanded video proof of Vic being drunk in exchange for $100. Does that ring a bell?

A. Yes, sir. I didn't occur -- I'm going to clarify, though. You see, this is somebody's words, not mine. I didn't encourage someone to attack anybody.

I will tell you what happened, if -- if I may, Sean.

Q. Sure.

A. There were all these rumors, I saw Vic falling down drunk, I'm stumbling around a convention. Well, there are dozens of cameras rolling at all times. I've never been stumbling drunk in my life, ever, on the planet Earth. And these rumors made up by fans just looking to get attention were more and more frustrating. And so I told one of my friends, why don't we set up a PayPal and anyone who can provide video evidence of me stumbling around drunk at a convention, I'll give them a hundred bucks.

Q. Okay.

A. Suffice to say, nobody ever claimed it, because it never happened.

Q. And during this rumor panel, did you encourage people to go on sites and tell everybody that they were wrong about you?

A. I encouraged people that were my friends and supporters to be supportive.

Q. And have you had -- between the Tekkoshocon panel and the January 19th discussion you had with the Risembool Rangers, have you ever done that in between, in the last nine years?

A. Not that I recall. Actually, I kind of got used to it after a while. You know, the first time it happened, I tried to -- I tried to address it, and then I just kind of came to terms with the fact that there are people out there who are going to say what they want to say from the anonymity and -- and -- you know, and safety of their laptops at home and I can't do anything about it, so I just stopped addressing it.

Q. And what are the -- what would you say are the rumors that have kind of persisted?

A. Well, this is one of the biggest ones, that I'm homophobic, although there's not one ounce of evidence, no -- I -- I would challenge anyone to provide any

public comment or attitude or anything that ever proves that I have been rude or cruel or hateful or mean or made -- ever made a homophobic remark.

I have several friends that are gay. There are many friends of mine that worked on my Star Trek production who are gay. I attended a transsexual friend's wedding.

Q. Let me show you what we're going to mark as Exhibit 14.

(Exhibit 14 marked.)

Q. (BY MR. LEMOINE) Do you recognize Exhibit 14 as the tweet you sent out on January 20th, 2019?

A. Yes, sir. This was the first -- the first response that I made four days after the -- I mean, based on the date, four days after the -- the social media thing began.

Q. And -- and this is the tweet that you put out after -- the day after you had the discussion on the Risembool Rangers website encouraging people to go out and talk about you in a positive light?

A. I -- I -- I don't remember the dates. Again, this was -- I was in quite a distressed place at this point, and I don't remember when. I wasn't going to respond. As I said just a minute ago, I had kind of gotten to the point where, you know what, don't -- don't

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encourage it, don't respond. And so for the first several days, I didn't respond, and -- and then this was the first public response.

Q. Now, you've kind of apologized in that letter to people you've made feel uncomfortable.

Was there anybody in particular that you were thinking or was that just more of a generic?

A. No, it was generic. It -- it was the idea of somebody that I might have hugged for a photo that didn't say anything at the time, but, of course they went home and posted about how they didn't approve -- appreciate it or something, and I apologized to those people for not being sensitive to that.

Q. Now, were there allegations floating around after January 16, 2019 that you were a pedophile?

A. Well, people have been throwing that word around for, you know --

Q. For -- for what?

A. Well, just for a while.

Q. About you?

A. Yes.

Q. For how long?

A. I don't know.

Q. I mean, when's the first time you can recall --

A. I don't recall. Like I said, there are people

out there that see me hugging someone for a photo in front of 300 other people and 25 video cameras, it's purely for the photo, and they -- and they decide somehow that I'm a pedophile. There is no evidence of that. There's no proof of it. There are no charges. There are no convictions. It's just salacious.

Q. Have any of the Defendants, to your knowledge, ever accused you of being a pedophile?

A. Not to my knowledge.

(Exhibit 15 marked.)

Q. (BY MR. LEMOINE) Let me show you what I've marked as Exhibit 15.

A. Uh-huh.

Q. The second email, Exhibit 15, that is the apology that you wrote, or the -- not the apology, but the letter you wrote to Monica Rial on February 8th, 2019?

A. Yes, sir.

Q. And you -- did you have any -- anybody help you draft this?

A. I bounced it off a couple of friends of mine before I sent it.

Q. Who did you bounce it off of?

A. My friend Jeff Johnson.

Q. Anybody else?

A. Not that I can think of.

Q. And at the time you wrote this, you had -- it's your testimony that you had no idea that Mrs. Rial had accused you of inviting her to your room -- or to your room and forcing yourself on her?

A. I never forced myself on her.

Q. Did you do anything? Did you kiss, make out with, or have any type of sexual interaction with Ms. Rial at any point in time?

A. If -- if -- if I understand correctly, this -- this is from 11 years ago and I -- I don't -- I don't have any specific recollection. But what I can tell you is that I have had hundreds of interactions with Monica over the years since, and no indication whatsoever that I ever did anything that upset or offended her.

Q. Has she ever been in your hotel room in the last eight years?

A. Sir, we've done dozens of conventions together, we have been friends and I -- I don't know any specific times, but I wouldn't be surprised if -- if that were the case.

MR. LEMOINE: I'm going to object as nonresponsive.

A. I wouldn't be surprised if she were, because we've done many, many, many events together.

Q. (BY MR. LEMOINE) As you sit here today, since -- in the last eight years, can you identify any time that you recall Mrs. Rial being alone with you in your hotel room?

A. Is she married now, Mrs. Rial?

MR. LEMOINE: Object as nonresponsive.

A. I'm just saying, I believe it's Ms. Rial.

No, I don't recall any specific events, specific times.

Q. (BY MR. LEMOINE) And -- and you don't actually have a specific recollection of her ever being in your room?

A. Not specifically, no.

Q. So the point in time in which you wrote this email on February 8, 2019, you were really struggling to figure out why she was upset with you?

A. Yes, sir.

Q. And she hadn't gone public with that in any way?

A. Oh, she had alluded to it publicly, but she had not given any specifics, which is why I said I really want to know what -- what it was that -- you know. I embarrass -- I am embarrassed to say that I honestly don't know. I hope you will share it with me so that I may sincerely apologize.

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Apparently, she wasn't interested in any apology, because the beginning of this she writes another member -- another actress at Funimation and says, This is what he always does, it's disgusting.

I guess she wasn't interested in any kind of sincere interaction.

MR. LEMOINE: Object as nonresponsive. Move to strike. There's no question on the table.

(Exhibit 20 marked.)

Q. (BY MR. LEMOINE) I'll show you what I've premarked as Exhibit 20. I'll represent to you that what Exhibit 20 is, it's a -- what's called written discovery, and it's an interrogatory where each side gets to ask the other side certain questions. And these are questions that your attorneys asked --

A. Okay.

Q. -- of Ms. Rial. And what I want to do is go through one of her -- some of her answers and get your comments. So I want to start on page 5 of Exhibit 20.

A. Yes, sir.

Q. Interrogatory number four. Are you with me?

A. Yes, sir.

Q. Okay. Interrogatory number four has a request about, at some point in time which you grabbed or kissed Mrs. Rial in a hotel room in the mid 2000s.

As we sit here right now before reading the response, do you have any recollection of any type of interaction in your hotel room with Ms. Rial where you kissed her?

A. No, sir.

Q. Okay. All right. So if you look at the first bullet point, it says, Plaintiff grabbed and kissed Defendant without Defendant's consent on Sunday, November 4, 2017, while --

A. 2007.

Q. I'm sorry, 2007 -- while Plaintiff and Defendant were both attending Izumicon, Oklahoma City, Oklahoma.

Any recollection of that?

A. No, sir. That was 12 years ago.

Q. If you turn to page 6. The first bullet point at the top of page 6 says, Plaintiff played videos promised, while Defendant stood to watch video. The Plaintiff soon grabbed the Defendant by the upper arms and began aggressively kissing Defendant. Defendant attempted to resist, but Plaintiff physically restrained Defendant, pushed Defendant back towards -- backward toward the bed. Plaintiff climbed on top of Defendant and held her down as he continued to aggressively kiss Defendant.

Did that happen?

A. No, sir.

Q. And you're sure that didn't happen?

A. Yes, sir.

Q. Second bullet point on page 6, Plaintiff continued in this fashion for several minutes, despite Defendant's --

A. Several minutes.

MR. LEMOINE: Object, nonresponsive.

A. What was Ms. Rial doing at this time?

Q. (BY MR. LEMOINE) Let me get the question out.

A. Sorry, I apologize. I apologize. This is the first I read this. I'm sorry. I apologize.

Q. Let me start over at the bullet point. Plaintiff continued in this fashion for several minutes, despite Defendant's fear and shock, until Ms. Dahlin knock -- Mr. Dahlin knocked on the Plaintiff's hotel door. Plaintiff left Defendant on the bed and hurriedly answered the door. Mr. Dahlin inquired whether the Defendant was okay, clearly noticing the stress. Defendant, however, was too shocked and afraid to admit what had occurred.

You dispute that, right?

A. I don't recall that at all.

Q. Okay. The third bullet point. Following

dinner, Plaintiff forced Defendant to speak with Plaintiff's long-time fiancee on the telephone and Plaintiff spoke with his fiancee as if nothing happened.

Do you recall that?

A. No, sir.

Q. And your fiancee at the time would have been Ms. Specht?

A. Michele Specht.

Q. Now, prior to today, have you seen that description from Ms. Rial in -- in any --

A. I'm sorry, say that again, sir.

Q. Prior to today, have you seen or heard that description from Ms. Rial online or anywhere?

A. I -- I know of the story that she posted online back when she originally posted it. But I -- I -- there are more details here than there were in her original story. Like, I don't believe -- on the online story, she didn't say anything about when or where, she didn't say anything about Stan Dahlin, she didn't say anything about putting her on the phone. By the way, I -- well, I -- I just don't even understand a lot of it, so --

Q. Have you ever grabbed Mrs. Rial's hair -- Ms. Rial's hair and pulled it back and whispered in her ears before?

A. Whispered what?

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Q. I don't know.
A. Neither do I.
Q. I'm not asking for what you whispered, I'm asking if you --
A. Well, you asked if I did. I don't recall whispering anything.
Q. And do you recall grabbing her by the back of her hair and pulling her hair?
A. I -- well, I -- I -- I recall doing that, not in a violent or hurtful way, but in a playful way.
Ms. Rial used to be a hairdresser. She's always kind of changing her hairstyles over the years and coloring cool colors and -- and I -- and I always used to comment on how much I loved her hair or her new hairstyle.
It's really disingenuous to use the term pulling hair, too, because it sounds -- it just has a connotation of being somehow violent, and it -- it was never that.
Q. But you did put your hands on her and pull her hair?
A. Yes, sir.
Q. And you've done that more than once?
A. No. I -- I did not pull her hair. And, again, we were friends, it was all in casual interaction, and I

was never -- if she had ever told me don't -- please don't do that again, I wouldn't have ever done it again.
Q. And is that something you've done with other women in the past, where you pull their hair just playfully as part of just who you are?
MR. BEARD: Objection, form.
A. I would -- I would definitely say it has probably happened before in -- in playful interaction with people, but not very often.
Q. (BY MR. LEMOINE) Let me show you what we're going to mark as Exhibit 16.
(Exhibit 16 marked.)
Q. (BY MR. LEMOINE) Is Exhibit 16 a true and correct copy of a tweet that you sent out on February 13th, 2019?
A. Yes, sir.
Q. If you look at the third paragraph, it talks about your colleagues and that there was animosity that you didn't know existed.
Who are you referencing there? Who are your colleagues?
A. I am -- I am referencing any of the voice actors who not only posted, but those who liked or supported the people that did, people that, for the last 15 years of my work at Funimation, have seen me in the

hallways and even worked with me in productions and been nothing but friendly and kind and jovial, and I never had any idea that there was any animosity.
Q. Anybody you can specifically identify?
A. Well, I'm sure you can find them by who -- who posted, who liked the tweets.
Q. But nobody, as we sit here today, off the top of your head?
A. Well, I'm certain I was referring to Monica, probably Jamie, and I know that Chris Sabat, Sean Schemmel, and a few other voice actors liked and commented on -- on some of this, and I was quite dumbfounded when I -- when I found out. I'm like, oh, my goodness, like, I worked -- I cast this guy in my show and he was all friendly and -- you know, and jovial and best buddies, and now he's online joining in on this. It was surprising, to say the least.
Q. It was just a total shock to you because people were coming out that had known you for all these years, and --
A. Yes, sir.
Q. And you just don't know why they would do that?
A. Yes, sir.
Q. Did you seek the help of a counselor at any time on --

MR. BEARD: Objection, privileged.
Don't answer.
MR. LEMOINE: Why is it privileged? I'm not asking about what a counselor talked about.
MR. BEARD: That's true. That's -- fair enough. Fair enough.
You can answer yes or no, that's true.
Q. (BY MR. LEMOINE) Have you sought the help of a counselor prior to February 13th, but with regard to this whole issue?
A. I don't remember the dates, specifically, but I was in a great deal of distress and needed to talk to somebody and I -- I started spending -- I started seeing a counselor.
Q. So February 13th, kind of the last paragraph, you talk about you don't want to be hateful to anybody else.
Why did you -- why did you make that statement? Were you aware of something that was going on?
A. Well, because I -- I knew that there was a lot of -- what's the word?
Q. Vitriol?
A. Friction. You know what I mean? There was a lot of -- of growing friction. It was just building.

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And I -- I didn't -- I didn't want any of that. I didn't ask -- I did not ask for any of this. I didn't start any of it. I was living my life, and suddenly out of no where this stuff starts. I merely responded to it.

Q. And have you posted that type of statement anywhere else since then?

A. I have said that statement several times in events that I've attended since this, publicly, and there -- I'm -- I'm quite certain there are many videos online of me encouraging people to be kind and positive and -- and, you know, be known for -- for being a purveyor of good as opposed to negativity.

Q. What is it that Jamie Marchi has done to defame you?

A. Wow. Well, apart from mischaracterizing a very casual, brief interaction in public and the lobby at Funimation, she publicly posted that and then went on to say that she wanted my head on a stake and wanted my balls in a sling and has -- has posted many, many extremely vitriolic comments.

Q. And how is that defamatory?

A. Because she's a voice actress in my industry, and people will tend to give her more credence because they think, oh, well, she knows him. She -- you know,

she must -- her -- her -- her words must carry more weight than some -- some fan, you know, some miscellaneous fan out there.

Q. So what was it exactly that she mischaracterized or took out of context?

A. She mischaracterize -- my memory of -- of the event with Jamie was that I had come in to record one day at Funimation, and I was in the lobby and she was there, and she had just changed her hair somehow. She had -- she was wearing it differently or she had cut it somehow. Probably as far away as I am from Casey, and she said, Hey, Hon. And I'm like, oh, my gosh, I love your hair. And she's like, I know, I just got it -- and I walked around the -- the -- the counter, and I was kind of standing there kind of flipping it and like, oh, my gosh, it's really beautiful, I love it. And I -- and I put my hand up in the bottom of it and I'm like, oh, this is great.

It was not painful, it was not hurtful, it was not sexual, and it happened at least four or five years ago, maybe longer.

And if I may say, I saw Jamie in the lobby at Funimation in January of this year, literally a week to 10 days before this social media thing started, and she's like, Hey, Hon, and went over and hugged her and

said hello.

She and I have had, as far as I've known, a very casual, friendly relationship for many, many years, and I was astounded by her account online.

Q. And the account online is that you pulled her hair?

A. And that I pulled her hair and that I -- that I whispered something sexual in her ear, which absolutely is not true. I do not, have not, ever had any sexual interest in Jamie.

Q. Ms. Marchi certainly wouldn't be the first woman whose hair you've pulled?

A. No. We've established that. But I would take issue with the word pulling hair. That sounds like something you do in a fight with somebody, and that is not the intent ever. Nor do I believe they took it that way at the time.

Q. Are there any conventions that you can point to, as you sit here today, that you had an actual contract with that were terminated as a result of this firestorm?

A. Yes.

Q. All right. Which ones are they?

A. Phoenix Comicon. I'm fairly certain I had a contract with a couple of Informa shows. And my

understanding is that Informa told my agent that -- that one of their sponsors put pressure on them to cancel me. I do not know for a fact, but one of their sponsors, a big sponsor, is Funimation. So, you know, it would seem possible to me that Funimation put pressure on Informa to drop me from the shows that I was scheduled for. That would be Megacon, Fan Expo Toronto, Dallas Comicon. I think those are the -- the three that come to mind.

Q. All right. But you don't have -- no one has ever told you that it was something that Funimation did that caused you to lose those?

A. No one used the word Funimation, no.

Q. All right. Did those --

A. I might look into it a little further, though.

Q. All right. Did any of those -- in this conversation, did anyone tell you that it was anything that the three individual Defendants said or did that caused you to lose those -- those cons?

A. Kameha Con did.

Q. But we've established you got to go to Kameha Con, right?

A. Only after a great deal of back and forth. I was originally canceled, even though I had a contract, because of -- of -- of pressure put on by them and threats.

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I have also been told, again, I don't know specifics, not yet anyway, that there are other events that the Defendants have contacted and encouraged not to have me, or said they weren't going to come and they were going to try to get their other voice actor friends not to come if I was there.

Q. And who told you that?

A. I don't recall at the time. I don't recall right now.

Q. Do you know what cons that they allegedly -- the individual --

A. Not as -- not as I sit here today, sir.

Q. Do you have any written evidence, emails, text messages, anything?

A. Not yet.

Q. When did you first start doing voice work for anime films?

A. If memory serves, maybe 2000. Maybe 2000, 2001. I started in Houston with ADV Films and then sometime a few years after that, which is, by the way, where Monica began, that's how I knew her, and then a few years after that, I met people from Funimation who encouraged me to -- asked me if I wanted to play a role in certain things they were doing, and that's how I ended up starting to work at Funimation.

Q. When would you say your reputation in the voice acting community was at its peak?

A. I can't answer that. I don't know. I'm not -- it's not for me to say when it's at a peak. I don't know.

Q. Well, you don't kind of intuitively know when you're getting invited to more cons and getting asked to do more shows?

A. There's an ebb and flow to it all.

Q. When did you first start doing the Broly voice for Dragon Ball Z?

A. About 15 years ago.

Q. Is that the most famous character that you've done?

A. No, sir.

Q. What's the most famous character?

A. Probably Edward Elric from Fullmetal Alchemist.

Q. When was the last Fullmetal Alchemist?

A. Full -- I'm sorry. Sorry. Fullmetal ended, wow, roughly 10 years ago.

Q. And you've also done the voice characters on video games; is that correct?

A. Yes, sir.

Q. What video games?

A. Oh, wow. Soul Calibur, Persona, Sonic, Final

Fantasy, a large number. I kind of just don't even keep track anymore.

Q. When you go to these cons, do you usually do panels by yourself or are you with people?

A. Both.

Q. Is it unusual for you to do a panel by yourself?

A. No. But it's also not unusual to do them with others.

Q. And what about most recently when you were in Ireland, did you do panels by yourself or with others?

A. I paneled -- I did panels by myself. Often, I'll do a -- often, I'll do a panel on a particular show, and if there are other voice actors there that were part of that show, you know, we'll do a Fullmetal panel with me or Kaitlyn and -- and Aaron. Or if there are multiple people that are at the convention who were in that show, or if it's a Dragon Ball panel, you know, we would do a panel if there are multiple voice actors there from Dragon Ball.

Q. How many cons have you done in 2019?

A. Nine, thus far.

Q. Do you typically average between 30 and 40 a year?

A. No, I -- I think I average closer to 20 or 30.

I had a pretty large number lined up for this year. I can only assume because of -- of the Broly movie. He's a pretty poplar Dragon Ball character, and I've played him in all the anime and video games, Dragon Ball video games for 15 years. So it was kind of exciting when they came out with a new movie that he was the main character of. And it's apparently done very, very well.

Q. Would you agree with me that if you read the articles that were being written about you that are reflected in Exhibits 1 through 8, and you were at convention, on or around convention, that that would give you pause to invite you to conventions?

A. Some yes, some no. I've spoken to convention organizers who come down on both sides of it.

Q. So there's some conventions out there that aren't concerned at all about the allegations against you?

A. There's some.

Q. All right. And then there's others that are?

A. Certainly. And if I may say, I hope this is okay, but if I -- I mean --

MR. BEARD: Go ahead.

A. A convention organizer may be on the fence, based on rumor and social media, but if a voice actress in the industry or a voice actor in the industry calls

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up and -- and puts pressure or -- or a -- an animation company like Funimation or Rooster Teeth calls up and puts pressure on a convention, you know, they can certainly sway the conventions having me.

Q. (BY MR. LEMOINE) All right. As you sit here today, you don't know of any instances where Funimation or Rooster Teeth put pressure on a convention not to hire you or allow you to come, do you?

A. Not yet.

Q. All right. And other than Kameha Con, are you aware of any other conventions that any of the individual Defendants reached out to that chose not to let you come, or cancelled the contract with you?

A. You know, Sean, I'm thinking now there was one, and I can't remember the name. Can I have a second?

Q. Sure.

A. No, I don't yet have any specific information to that effect.

Q. Are you familiar with a website called prettyuglyliar.net?

A. I've heard of it.

Q. Have you ever gone on and looked at it?

A. No, sir.

Q. Why not? Well, take it -- let me strike that. What have you heard about it?

A. I'm sorry?

Q. What have you heard about it?

A. I have heard that it's just a repository for garbage.

Q. About who?

A. Anybody. You. I mean, anybody. No one. Anybody. Anything salacious, anything people desperate to know about other people might want to read.

Q. Right. I'm going to show you what we're going to mark as Exhibit 25.

(Exhibit 25 marked.)

Q. (BY MR. LEMOINE) I'll represent to you that Exhibit 25 represents a Google Docs repository that's associated with prettyuglylittleliar.net. This particular Google Doc was pulled on April 25th, 2019, and it goes through a series of allegations at lengths, associated with people who have made statements about you over the years. But you've never read it, correct? Never been through pretty little -- Ugly Little Liars to see what was being said about you?

A. No, sir.

Q. When's the first time you can recall allegations of sexual harassment being raised against you in your career as a voice actor?

A. Can I ask you to define sexual harassment?

Q. Unwanted touching.

A. So that -- so any -- any unwanted contact is harassment?

Q. Sexual harassment, yeah.

A. Sexual harassment?

Q. Sure.

A. I -- I don't agree with your definition personally.

Q. Well, then give me your definition of sexual harassment.

A. Forcing somebody to engage in sexual-related behavior against their will.

Q. So you have to use some type of physical force to harass them under your definition, right?

A. Or verbal.

Q. And when's the first time that you were ever -- has there been any allegations made against you for verbal or physical sexual harassment?

A. Well, for the longest time, my only recollection of the rumors and stories online were that I would hug fans that -- you know, that didn't want to be hugged or, you know -- or I would get -- I would be too close to -- to a fan that didn't appreciate it. And of course they didn't say anything at the time, but they -- they mentioned it later. Those were the first

instances I ever heard of.

Q. And when was that, like, roughly?

A. I -- I don't remember.

Q. Would you agree with me that this issue of you kissing young girls and that being kind of creepy has been around for a while?

A. No, sir.

Q. Something that just started?

A. No, I wouldn't agree that it was kind of creepy, that part of your sentence.

Q. All right. How about we do it this way: Would you agree with me that people online have commented that it's creepy that you kiss young girls?

A. Sure.

Q. And that's been around for a while?

A. Yes, sir.

Q. And that's certainly impacted your personal reputation, hasn't it?

A. Not much. I mean, I -- I was doing pretty well in the industry, as you pointed out yourself at the beginning of the deposition. I have done hundreds of characters. I've -- I'm just saying I have been a voice actor at Funimation and been hired repeatedly for 15 years, and --

Q. And it all started on April 16th, 2019, when

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that tweet went out?

A. April?

Q. I'm sorry, January 2016.

A. No. No. Like I said, my belief is that -- that that date was chosen to piggyback on the popularity of the Broly movie. There has been a recurring theme here. Over the years, any time I am announced as part of a new, big new show or playing a role, there are always a handful of people that want to jump on that publicity and -- and get some attention for themselves.

Q. And -- and by get attention to themselves, you mean people post anonymously that you -- you harass people or do inappropriate things?

A. Yes.

Q. And so they want to get attention for themselves --

A. Yes.

Q. -- through an anonymous avatar, I guess?

A. Yes. For the same reason they don't want to be listed right now, because they want the attention, they want people to click on, ooh, I like your post, and, oh, look how many people liked my post, but they don't -- you know, they certainly don't want the accountability. And whenever any supporters have been pressed for any evidence or substance, well, a friend told me that they

heard from a friend, who saw a friend who said that they heard at a convention four years ago, etc., etc.

Q. And so the people that have come out and actively accused you of things, you've sued?

A. I'm sorry?

Q. The people that have come out with evidence and said, this is my testimony and this is what happened, you've sued them?

A. What evidence would that be?

MR. LEMOINE: Objection, nonresponsive.

Q. (BY MR. LEMOINE) Isn't it true that you -- well, let me back up.

Your complaint is that people don't offer evidence, right? They just say things anonymously, fair?

A. Some people.

Q. All right. And some people actually come out, use their name and make statements about things that you've done that they think were inappropriate, right?

A. Yes.

Q. And you've sued at least two of them, two women that allege that you did inappropriate things to them, correct?

A. Yes.

Q. All right. You haven't sued any of the

magazines or online articles that wrote articles using all of these anonymous names?

A. Not yet.

Q. You're planning on doing that?

A. Possibly.

Q. You would agree with me that if you don't sue those magazines, your reputation is still going to be damaged because you'll never --

A. Oh, I would say my reputation has been irreparably damaged.

Q. And because of those articles, correct?

A. No, sir, because of everything. All of it. It's a cumulative thing. Didn't you use -- like the term you used, death by a thousand cuts, you know.

(Exhibit 18 marked.)

Q. (BY MR. LEMOINE) I'm going to show you what we're going to mark as Exhibit 18.

Who is -- Alyssa Fluty does work --

A. I mentioned her earlier, and she -- she is one of the moderators for the fan club, for the Risembool Rangers.

Q. Do you know who drafted this statement?

A. No. I've never seen it. I -- I mean, it says at the top, Hello, my name is Alyssa Fluty, so I can only assume that Alyssa drafted it.

Q. But you didn't have any role in drafting?

A. No, sir.

Q. First time you've seen it is when I handed it to you today?

A. Yes, sir.

Q. Do you know if there are any other character statements for you?

A. I have been told that there has been a website accumulating people's positive accounts of interactions and how I've helped them through difficult times with encouraging words and support. You might be very surprised. There are a lot of them. People that have written me over the years.

Q. Are there any -- is there a repository of statements from women that have been alone with you in your room expressing positive support for that interaction?

A. I'm not aware of them.

Q. Did you ever text with Chris Slatosch at Kameha Con?

A. We talked about this, didn't we? I -- I -- I think I told you that I did not text with him at all until after he contacted me three months after canceling me and we -- and decided to re-invite me, and then received pressure from Monica, Chris Sabat, others, I'm

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sure, and started going back and forth. I -- I involved my attorney because we had a contract, and I'm sure there were a few interactions by text.

Q. Is there a Houston couple, I don't know their full names, that you're good friends with? Does that ring a bell?

A. I'm afraid you'll have to be more specific. I -- I lived in Houston 20 years. I have a lot of friends in Houston.

Q. All right. How about -- how about this: Is there a Houston couple that helps hire prostitutes, and helps you pick them out and send them to you? Does that ring a bell?

A. There was -- there -- there is a friend of mine who told me of a site, which is how I found about the one time that I told you that I tried it.

Q. All right. Have you ever -- has any friends or anybody assisted you, in terms of actually hiring --

A. No, sir.

Q. -- a prostitute and sending her to your room?

A. No, sir.

Q. What was Star Trek Continues?

A. It was a fan-made web series about -- that -- that picked up where the original Star Trek ended, and finished the original five-year mission of the

Enterprise from the original series in the '60s.

Q. And how many series did -- how many episodes were there?

A. We made 11.

Q. And is that something you did like a GoFundMe or some type of kick starter for it?

A. As a matter of fact, I funded the first episode myself, and then after we made an episode, that basically is a proof of concept -- well, myself and -- and -- and another gentleman funded the first episode. And then once we had the first episode and we put it online, people really enjoyed it. We began Crowdfunding to make further episodes.

Q. And you made -- ultimately made 11 total?

A. Yes, sir.

Q. And were you paid by any studio for that?

A. I'm sorry?

Q. Were you paid by any studio for that?

A. No, absolutely not. In fact, we were not allowed -- to this day, we've not sold or -- or made any profit from Star Trek Continues because it's a licensed property. We made it as a -- as a fan series just to celebrate Star Trek.

Q. Do you have any films coming out this year?

A. I have been contacted by a couple of people

interested in having me do something, but nothing has been done yet, so I don't know when it would be shot, so I certainly don't know when it would be coming out.

Q. What about any anime films that are in the can that will be released this year? Rohan for JoJo?

A. Yeah, I was going to say there are a couple of -- of -- I believe that's already all been released. But there are a couple of recurring characters that I -- that I played, that I don't think they have been released yet, but they've already been recorded.

MR. LEMOINE: All right. Let's take a little break. I'll talk to everybody. I think I'm ready to pass the witness.

THE VIDEOGRAPHER: And we're going off the record at 4:29.

(Break taken from 4:29 p.m. to 4:37 p.m.)

THE VIDEOGRAPHER: And we're back on the record for the beginning of disc number 6. The time is 4:38.

CROSS-EXAMINATION

BY MR. JOHNSON:

Q. Okay. Mr. Mignogna, my name is Sam Johnson. We met this morning. But have you and I ever met or spoken before that interaction this morning --

A. No, sir, not that I know of.

Q. -- that you can recall?

Okay. And just so you know, I represent Jamie Marchi in this matter, who's also a Defendant in this case.

So I know you've answered a lot of questions today, and I'm going to fill in some gaps that I have in my list, but a lot of -- a lot of what I had has already been addressed, so I'm going to do my best not to duplicate that.

Same rules apply. Please allow me to finish my question before you answer. If you need a break, just let me know.

A. Yes, sir.

Q. All right. Thank you. I wanted to -- to take a few steps back and talk a little bit more about -- about your work and about what you do. So I know we talked a little bit about how many productions you've been in, how long ago you started.

From what I can tell, not all of your work is in anime; is that correct?

A. The vast majority of it is, but not all of it, certainly.

Q. Okay. Are there -- other than the Star Trek Continued -- is it continued?

A. Continues.

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Q. Continues.
A. That was just a passion project.
Q. Okay. Are there -- are there any other live action productions that you've been in?
A. A handful over the years.
Q. Okay.
A. I've done some Christian films and I've done some short films, and --
Q. Are there sub genres of anime that you appear in or your voice appears in more than others? I don't know the answer. I don't know if that's a thing. Just wanted to ask.
A. I would say, no, sir.
Q. Okay.
A. I -- again, when you're talking about 300-plus project -- series, you're talking about every conceivable style and genre.
Q. Uh-huh.
A. Scary, funny, shows for boys, fighting, MECA shows, romance shows, scary. I mean, it -- it covers the gamut.
Q. Okay.
A. And often, I don't even know what I'm going to do until I get in there. I don't even know a lot about what I'm doing until I get in there and they go, you're

this guy.
Q. Okay. So you don't normally get the script --
A. No --
Q. -- very far in advance?
A. -- never in -- no, you don't get it ever in advance.
Q. Okay. I know you've got some social media presence. I wanted to walk through and see exactly which platforms you have an account on.
A. Okay.
Q. I know you have a Twitter account; is that correct?
A. Yes, sir.
Q. Do you have a Facebook account?
A. Yes, sir.
Q. On Facebook -- strike that.
Do you have an Instagram account?
A. No, sir. I -- I -- I -- I downloaded the app because of all the cool things you can do, like put funny faces and hats and weird things, you know, but I don't ever use it. I've -- I don't think I've ever posted on Instagram once.
Q. How about Snapchat?
A. No, sir.
Q. Any other social media platforms that you

regularly use?
A. No, sir. And the only reason I've ever used them is because fans encouraged me to do them as a way to interact with the fans.
Q. Right. And your Twitter account, if I'm -- if I remember correctly, is verified; is that right?
A. That -- I -- I think so. That means that they -- they basically verify that you're you?
Q. That's right.
A. I think it's true. There's a dot or something; is that right?
Q. Yeah, there's a blue circle with a little white checkmark inside --
A. Okay.
Q. -- next to your -- your name.
A. I believe you.
Q. Did you -- do you remember what you did to get that account verified?
A. No, I don't.
Q. Okay. Do you know if you did anything?
A. I don't remember doing anything. In fact, when somebody said something about being verified, I'm like -- I literally said, how does that work, like how -- how do you do that?
Q. Do you use a publicity firm that might have

done that for you?
A. No.
Q. Do you use a publicity firm at all?
A. No.
Q. So you do all of your -- your publicity, your social media posting, your statements, all that's --
A. Yes, sir.
Q. Let me finish, please.
A. Sorry. Sorry.
Q. All those things, you generate those yourself?
A. Yes, sir. Or I have. I have. Over the years, I have. This incident has been the first time that I have ever sought the services of someone to -- to help.
Q. Okay. So with regard to the -- the statements and occurrences that are discussed in this lawsuit, you have been receiving some publicity help?
A. Well, the -- the couple that I mentioned --
Q. Okay.
A. -- in particular.
Q. All right.
A. Attorney interaction, of course.
Q. Uh-huh. Any PR firms?
A. No, sir.
Q. Okay.
A. The -- the couple in Florida considers

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themselves kind of a PR couple firm, but I don't know if they actually have a name. You know what I mean? I don't know if they're an official thing --

Q. Right.

A. -- but --

Q. I think I understand.

And you are the voice -- is it Broly or Broly?

A. Everybody says something different. I've always thought it was Broly.

Q. Okay.

A. But some people say Broly, so --

Q. And I understand that film, Dragon Ball: Broly, was the third highest grossing anime film in the United States. Does that sound right to you? Were you pretty pleased with that success level?

A. Yeah. It was -- sorry.

Q. Uh-huh.

A. It was a privilege. I was really proud to be a part of it. I mean, I played this character for 15 years and he would be in video games and stuff. And when I would do events, fans would always say, oh, I love Broly, he's my favorite character in Dragon Ball. When are they ever going to do anything more with him? And I would always say, I don't know, wouldn't that be

fun? And then when this movie was announced, you know, I was -- I was real excited about it.

Q. Uh-huh. That's a big deal, you know, third highest grossing. And I assume that brings with it a pretty significant fan base?

A. I already had -- I think they already existed.

Q. Okay.

A. I -- I -- I think. I don't -- again, I don't do any analytics or count this or that.

Q. Uh-huh.

A. But I -- I -- I think my overall body of work over the years has -- you know, has been pretty well received.

Q. Okay. Yeah, your IMDb page says that you've been in over 356 productions. Does that sound --

A. See, I -- I don't even know. I -- I mean, I said over 300, and I didn't even know.

Q. Right.

A. I -- I don't keep track. After a while, you just do them.

Q. Do you ever have that situation where people -- you know, if you're at the airport or Starbucks or whatever, do fans recognize you out --

A. No.

Q. -- in public?

A. No, and I think that's one of the interesting things about voice acting.

Q. Uh-huh.

A. You know, you just -- you're not recognized.

Q. How about when you're at the conventions?

A. Well, I mean, there, yes, because people come there specifically to celebrate anime.

Q. Okay.

A. And because of the internet, you know, you can look up, you know, people's faces and stuff and find out who somebody is who played this character or that.

Q. What is Risembool?

A. Risembool was the town that my character and his brother came from in Fullmetal Alchemist.

Q. Okay.

A. So it was literally just a --

Q. Your fans?

A. It was -- yeah, the -- two -- two women started the Risembool Rangers. I -- I didn't start a fan club, I didn't ask anybody to start a fan club. A couple of fans contacted me and said, We want to start a fan club for you. I'm like, really? Okay. How fun, right? And they came up with the name based on the anime.

Q. Okay. So it was based off of your prior work?

A. Yes, one of the characters that I played.

Q. I do want to switch and talk about Jamie Marchi, my client, at this point.

How long have you known Jamie?

A. As long as she's been working at Funimation. I -- I -- I honestly can't tell you an amount of years.

Q. Uh-huh.

A. It's one of those things you don't really think about because you don't think you need to ever really know, but it's been as long as she's -- if I had to guess, maybe 10 or 12 years, maybe.

Q. And so did you meet her working at Funimation?

A. Yes, sir.

Q. And were you-all working on a production together, or --

A. We worked on several productions.

Q. Is that how you first met?

A. Actually, it's an interesting dynamic, because voice actors typically record alone, which means you and I, and him, and him, and her, could all be in a show together and never even meet each other because we would come in separately and record our lines. But you might cross paths in the hallway or you might see each other in the lobby.

And many times, you also would do a convention and other voice actors would be there. I've

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actually met voice actors for the first time, who I'd been in 8 or 10 shows with, and I'd never met them, but I met them at a convention because we were both invited there. And that's honestly how, more times than not, you actually talk to them more and, you know, get to know them a little more there.

Q. So did you ever -- I know you said you've done some live action productions. Was Jamie in any of those with you, that you can recall?

A. Not that I can recall, no.

Q. Okay. But you-all did interact at conventions?

A. Sure.

Q. Okay. I do want to go ahead --

MR. JOHNSON: What exhibit number are we on?

THE REPORTER: 22. Or, you guys, did you already mark something?

MR. BEARD: No, we didn't mark anything.

THE REPORTER: Okay.

(Exhibit 22 marked.)

Q. (BY MR. JOHNSON) All right. I'm going to hand you what I've marked as Exhibit 22. And I'll represent to you that this is a cease and desist letter that was sent by your attorney to Ms. Marchi. Have you seen this letter before?

A. No, sir. I was informed that it was sent, but I have not seen it personally.

Q. Okay. I just want to walk through this letter. If you'll look with me, and in the first full paragraph, it says that the demand was relating to posts and tweets using the personal social media account, including @rontoye. Since this is sent to Ms. Marchi, I'm assuming that's a typo. Do you have any reason to disagree with that?

A. Can I read that real quick?

Q. Please.

MR. BEARD: It's a typo.

A. I don't know. I don't know what that is relating to.

Q. (BY MR. JOHNSON) Okay.

A. Can I consult my -- is it a typo? I don't know.

Q. I just wanted to make sure there wasn't something I --

MR. BEARD: It's a typo.

Q. (BY MR. JOHNSON) -- that I wasn't aware of.

A. No, I don't --

Q. Yeah. Lawyers are humans, too.

A. It's the first time I'm seeing it, too.

Q. We have typos, so it happens. I want to walk

through with you the statements that your -- your cease and desist letter addressed --

A. Okay.

Q. -- by Ms. Marchi. And the first one I want to look at is -- is February 6th, 2019, at 9:05 p.m. And there are some quotes in the letter, but if you'll turn back to the --

A. Wow.

Q. -- fifth page, there's an image of the actual tweet. And I just -- I want to give you a minute to look at it.

A. Okay.

Q. All right. Is your name mentioned anywhere in this tweet?

A. No, sir.

Q. Okay. What -- what in here is there to let you know that it references you?

A. Well, who is she responding to? Do we have the previous tweet? Clearly, she's responding to someone, right?

MR. JOHNSON: Object, nonresponsive.

Q. (BY MR. JOHNSON) I'm just asking, based on what you can see on -- on the page, is there anything that would let -- let someone know that it's actually referencing you?

A. On this page alone?

Q. Correct.

A. No, I don't see any -- I do not see my name here.

Q. Okay. What -- what are the statements of fact -- if we assume that this is about you, what are the factual statements that are made about you in this tweet? Something that could independently be verified by someone, if you read through it?

A. Well, this tweet alone?

Q. Uh-huh.

A. Nothing.

Q. Okay.

A. But there -- she tweeted before this, when she initially tweeted her account of something.

MR. JOHNSON: Object, nonresponsive.

Q. (BY MR. JOHNSON) We'll -- we'll get to her other tweets.

A. Okay.

Q. I'm only asking about this one, so --

A. No, there -- there -- there's nothing in -- in here except a lot of anger, that I can see.

MR. JOHNSON: Object, nonresponsive.

A. I'm sorry, what was your question?

Q. (BY MR. JOHNSON) The question is just what in

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this particular tweet on February 6th is a statement of fact about you?
A. Nothing.
Q. Okay. And then in -- in your letter -- sorry to make you flip back and forth.
A. Sure. No worries.
Q. But in the paragraph that goes from the first page to the second page, that your lawyer wrote, it says that this tweet implies that you committed some type of criminal offense.
Do you see anything in this particular tweet that gives that impression that -- that a criminal offense was committed?
A. No, sir. But it's -- you have to take the context of the entire thing.
MR. JOHNSON: Object, nonresponsive after no, sir.
A. I -- I -- I said, no, sir. I'm sorry, that was -- yeah, that was my response, sorry.
Q. (BY MR. JOHNSON) You're fine. That's my job to clean it up.
A. Okay.
Q. All right. That's all my questions about that -- that tweet. I'm going to skip ahead from the order that they're addressed in in the letter to the

next one chronologically, which was on February 7th, 2019. And that is on the last -- I'm sorry, page 11.
A. Okay.
Q. Do you see that tweet, it's -- it says What Would Jesus Do?
A. Page 11? Oh, goodness.
Q. Yeah, the 11.
A. I looked down here and I saw one, slash, one and thought it was 11.
Q. No problem.
A. So sorry.
Q. Uh-huh.
A. Eight. Am I -- am I blind? Seven -- page 8 is the last page I have here.
Q. It's the one before that, sorry.
A. Okay.
Q. Give yourself a moment to read that.
A. Okay.
Q. And my questions might sound familiar to you. The first one is, is your name stated in this tweet?
A. No, sir.
Q. Is there any direct reference to you, that you can see?
A. No, sir.
Q. If we assume that this tweet was about you,

what is the statement of fact about you in here?
A. No statement of fact about me in this tweet.
Q. Thank you. I want to go to the last page in this, and there's no date here. But there's another -- it's a little harder to tell, I can't tell. I think it's a tweet, also. But there's one that's attributed to Ms. Marchi. Do you see that on this page, as well?
A. Here?
Q. The third one down.
A. Yes.
Q. Yes. Give yourself a moment to read that.
A. Okay.
Q. All right. What is the statement of fact about you in this particular tweet, as you read it?
A. The only thing that I can see is where she says, Fighting back does not in any way, shape or form make me as bad as Vic. I would say that tends to create a statement of fact that I'm a bad person.
Q. Is that the only statement of fact that you see in there?
A. Yes, sir.
Q. Do you see anything in that tweet that implies, as you read it, that you are a bad person, akin to a criminal, or that there's any reference to criminal activity in this tweet?

A. Not in this tweet, no.
Q. Thank you. All right. And then the last one is -- that I want to talk about is, is the one, it's on February 8th, and it's -- it's -- I think might be the one you had in mind a few moments ago, the -- the one that I'm going to refer to as Ms. Marchi's statement.
A. Okay.
Q. So if I use that term, this is what I'm referring to.
A. Yes, sir.
MR. BEARD: Counsel, we're going to be here tomorrow. The jury didn't come to a decision so we're in here tomorrow morning.
MR. JOHNSON: Okay. Thanks.
Q. (BY MR. JOHNSON) So -- and -- and I'm -- I'm wanting -- have you seen this tweet before? It's -- it's pretty lengthy. Do you recall having read it before today?
A. I'm pretty sure I read it. Somebody said -- somebody called me, a friend, and said, Jamie Marchi just tweeted. And I'm like, Jamie, what about? And I -- and then I -- I read it, or somebody, like, Screencapped it and sent it to me.
Q. Okay. I actually want to walk back to -- to the second page of -- of this exhibit, the -- the actual

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letter your attorney wrote for you. If you'll go to the second page, there are a few statements that they point out that I just want to work through with you.

A. Okay.

Q. They -- they point out the statement that -- that's made, that you, quote, Gave almost all the women at my job the creeps, unquote. Do you see that in there?

A. I do.

Q. Okay. And then there's the statement that -- at -- at the time of the incident, Ms. Marchi's writing about, that you whispered something sexual in nature to her?

A. Correct.

Q. All right. Do you have any evidence, that you're aware of, that Ms. Marchi did not actually believe these statements to be true at the time she wrote them?

A. At the time she wrote them or at the time they happened?

Q. At the time she wrote them.

A. I can't answer for her. I don't know what's in her mind. I -- I can't say whether she believes it's true or whether she was joining in to pile on. I don't know.

Q. Are you -- and I know you're not an attorney, sir, but are you aware of anything in the Texas Penal Code that is defined as being simple assault?

A. No, sir.

Q. You're not aware of any crime or statute that's referred to that?

A. I mean, I've heard the term. I don't know the -- the definition or the details of it.

Q. Okay. So sitting here today, you don't know if that's actually a crime under Texas law?

A. Well, I don't know what it is so -- and I don't -- no, I don't know if it's a crime.

Q. I don't either. That's why I was asking. Do you know, are there any crimes in the Texas Penal Code that legally classify a convicted defendant as a predator? Are you aware of any of that?

A. I don't know.

Q. Would you agree with the statement that the way one person perceives a situation is not always going to be the same way everybody perceives that same situation?

A. Of course.

Q. So is it possible that Ms. Marchi perceived pain when you pulled her hair in the lobby that day, and that you were unaware of that?

And the reason I ask is you testified

earlier --

A. I have -- I -- I had no indication that -- I had no indication when it happened or in the years that followed that we've been friends and interacted that I -- that there was anything offensive or painful about it. In my mind, my recollection, it was very casual, playful interaction as happens all the time in the hallways of Funimation.

Q. But you would agree that she certainly could have perceived it differently than you?

A. Sure.

Q. Is it your testimony today that you did not say something sexual into Ms. Marchi's ear at that moment that you're grabbing her hair?

A. Yes. Sorry.

Q. You're good.

A. Yes, it is, absolutely.

Q. Do you recall if you said anything into her ear?

A. I don't recall that I said anything. If I did, it was literally something about, ooh, I love your hair, or, love it, it's awesome. You know, it was that kind of a thing.

Q. Okay. Other than the statements that we've discussed today, are there any other statements by Ms.

Marchi about you that are statements of fact that you allege to be defamatory in nature, that -- that you're aware of?

A. At present that I'm aware of, no.

MR. BEARD: What is the number of this exhibit?

MR. JOHNSON: This was Exhibit 22.

Q. (BY MR. JOHNSON) I know you've talked today about Defendants having reached out to conventions and encouraging them to end their relationship with you or cancel a contract.

Sitting here today, are you aware of any conventions that Jamie reached out to for that purpose?

A. I'm going to answer and you're going to say nonresponsive.

MR. JOHNSON: Objection, nonresponsive.

A. See there, we just saved ourselves six or seven seconds. I have been told by several convention organizers who had booked me to be at their show that they were not inclined to cancel me until voice actors started coming out. Because they -- they weren't going to give a lot of credence to just a bunch of people on the internet, you know.

Q. (BY MR. JOHNSON) Uh-huh.

A. But -- but when the voice actors came out, and

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we all know who the voice actors were that came out, so, I mean, it's kind of an assumption, they didn't call me and say, Jamie Lynn Marchi and Monica Rial, you know what I mean, contacted us, but they did tell me that it was the public comments by the voice actors that led them to ultimately cancel me.

Q. So it was the public comments, not -- not necessarily a direct contact by a particular voice actor to the convention?

A. I don't know.

Q. Okay.

A. I don't know if there was any direct contact or not.

Q. So sitting here today, you don't know of any conventions that Jamie directly reached out to, correct?

A. Not yet, no. Not at present.

Q. And then I think it was Ms. -- Ms. Denbow at Funimation that you were communicating with while they were conducting their investigation; is that correct?

A. Tammi Denbow, I think she's with Sony, not with Funimation.

Q. Okay. Thank you for -- for clarifying that.

A. I'm pretty sure; is that right?

Q. And I believe you testified earlier that she mentioned some of the people who had outcried --

A. Yes, sir.

Q. -- to Sony or to Funimation?

Did she ever mention Jamie during that process?

A. No, sir.

Q. Looking at your original petition filed in this lawsuit, just tracking that timeline, did you read the original petition in this case --

A. This one?

Q. -- what your -- what your lawyer filed to initial -- initiate the lawsuit?

A. No, sir.

Q. Okay. I'm just going to --

A. It probably would have looked very -- like, what is this, Latin? I mean, you know, I just kind of trust him to do what he does.

Q. I hear you. Well, I want to walk through a timeline with you --

A. Okay.

Q. -- and I want to see if this sounds about correct, as far as your terminations from certain conventions earlier this year.

On January 18th of this year, the Phoenix Fan Fusion Convention canceled your appearance --

A. Yes, sir.

Q. -- there?

A. That was the first one.

Q. And then January 29th, I think was roughly when Funimation terminated your contract with them?

A. 20 -- again, I think, what did we say, 27, 28, 26, 27?

Q. Late January?

A. Yes, sir.

Q. Okay. January 30th, Anime NYC and Anime Milwaukee canceled your appearances there; is that right?

A. I don't -- I'm sorry.

Q. That's okay.

A. I don't remember the dates.

Q. Late January, does that sound about right? I'm not trying to trick you, I'm just --

A. I know you're not, and I'm not trying to be evasive.

Q. Right.

A. I was a mess. I don't remember.

Q. Okay.

A. I don't remember dates of these things. I knew they were happening and it was kind of a --

Q. Uh-huh.

A. You know, it was a -- a cumulating thing.

Q. I guess my question is, if the first public statement by Jamie on Twitter, which -- which you allege to be defamatory, obviously, Ms. Marchi and I would not agree with that, but if the first one is dated February 6th, I'm trying to figure out how that could have impacted these conventions' decisions prior to the date of her tweets that -- that the cease and desist letter referenced.

A. It didn't impact the conventions prior to her -- to her -- her state -- her public statement, obviously. But there were, certainly, events that canceled me after, and there are presumably events and production companies who might have been -- have had me, and when they saw these things, they decided not to.

MR. JOHNSON: Object, nonresponsive after the word obviously.

Q. (BY MR. JOHNSON) Did you ever have any conversations with Chuck Huber about Jamie's online posts or tweets?

A. Yes.

Q. What were those conversations?

A. He contacted me shortly after she had posted. And he said that -- he's like, I -- Jamie was my writing partner and I've always had a great relationship with her and I -- you know, I don't know why she would say

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this.

And my response was basically, Dude, you know, I don't -- I don't know where this came from. I was completely floored when -- when she posted that. And like I said, I've had many interactions with her over the years since this alleged incident and they have all been positive and friendly. So I -- I -- I told Chuck that, and he told me that -- you know, that he -- he was concerned because he had written with Jamie, and she was a writing partner of his, and they were good friends.

Q. Okay. Did you ever text with him about Jamie?

A. I don't recall that I did.

Q. Email?

A. Not that I recall.

Q. What -- what current model -- what's your phone that you use?

A. iPhone.

Q. An iPhone. Do you know what model it is?

A. It's the X, the 10.

Q. Okay.

A. Yes, sir.

Q. How long have you had that phone?

A. A couple of months, I think.

Q. Okay. So since what, March, April?

A. Maybe. Maybe. Maybe.

Q. Okay. What was your prior phone that you had?

A. iPhone 9.

Q. Okay.

A. I've had every version of them.

Q. Did you keep the iPhone 9 when you upgraded to the 10?

A. I sold it or I was -- I intended to sell it.

Q. Okay. Did your text messages, to the extent any hadn't been deleted as part of your -- what you testified about earlier, were those transferred to your new iPhone, your text message conversations?

A. I -- I assume so. You know how you do the -- you do the backup --

Q. Uh-huh.

A. -- and then when you buy the new phone, you -- the first thing you tell it to do is restore from backup.

Q. Right.

A. But as I mentioned earlier with -- with the other gentleman, I -- I don't like to scroll through 55 text message conversations. Once a conversation is over, I'll get rid of it so it's easier to find the ones that are current and ongoing.

Q. You mentioned earlier that you have an

accountant that helps you with your financial --

A. Yes, sir.

Q. -- reporting. What is the accountant's name?

A. Frank Pacella.

Q. Could you spell Pacella, please.

A. Sure. P-A-C-E-L-L-A.

Q. Where is Frank?

A. He lives in New York.

Q. Okay. Do you happen to know his email address or his phone number offhand?

A. Not offhand. Can --

MR. BEARD: I can provide all that.

MR. JOHNSON: Thank you.

Q. (BY MR. JOHNSON) Were you scheduled to appear at Tekkoshocon in 2010?

A. Wow. That was a lot of events ago and almost 10 years. I -- I -- I don't -- well, yeah, wasn't that the -- I believe that the rumors panel that he referenced --

Q. Uh-huh.

A. -- mentioned Tekkoshocon 2010, so I -- I assume I was there.

Q. Okay.

A. I mean --

Q. Do you recall being uninvited from Tekkoshocon

--

A. No, sir.

Q. -- at any time?

A. No, sir. I wasn't there for -- I -- I was not there for several years, and then -- and then about three years ago, they invited me to do an event in Pittsburgh. It was run by the same people that ran Tekkoshocon. So they invited me to that event, and I did it, and then they said we need to get you back to Tekkoshocon. And about, like the following year or two years after, based on availability, I went back to Tekkoshocon.

Q. So there was nothing with your nonappearance at Tekkoshocon that arose from allegations that you were stalking someone --

A. No.

Q. -- that you can recall?

A. No.

(Exhibit 23 marked.)

Q. (BY MR. JOHNSON) I do want to give you one more exhibit. And I'm going to mark this as Exhibit 23. And I'll represent to you that that one's --

A. Oh, I'm sorry.

Q. Sorry.

THE WITNESS: Oh, okay.

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Q. (BY MR. JOHNSON) She's going to attack us if we don't keep the right exhibits --

A. Okay.

Q. -- down here when the deposition is over.

A. Stay over there.

Q. I'll represent to you that this is a letter that your attorney sent to Ms. Marchi in March of 2009, I'm sorry, 2019, informing her that she needed to preserve all electronically-stored information, data, all that kind of stuff.

Do you agree that if -- if you, whether directly or through an attorney were instructing the other parties to this lawsuit to preserve all electronic information that might relate to this case, that you should be doing that also, at least as of that date?

A. I suppose.

Q. Okay.

MR. JOHNSON: I'll pass the witness.

CROSS-EXAMINATION

BY MR. VOLNEY:

Q. Hi, Mr. Mignogna, my name is John Volney. I represent Funimation. The first time we met was this morning before this event started, correct?

A. Yes, sir.

Q. So I just have a few follow-up questions. I

want to start out with the timeline. On January 16th was the date that the latest Broly movie was released?

A. Yes, sir, in theaters.

Q. In theaters. And that was the same date that these social media posts started to happen that were accusing you of inappropriate behavior?

A. Yes, sir.

Q. Did you, at that time, communicate to anyone at Funimation about those social media posts that were coming out about you?

A. Yes.

Q. Who did you communicate with?

A. Justin Cook.

Q. What did you tell Mr. Cook?

A. I was in recording and -- for that Mononokean show that I -- that they tweeted that I was replaced in. And I had spoken with him. He was telling me -- he was showing me the -- the demographics and -- or not the demographics, what do you call it, the analytics, you know what I mean, of how well the movie was doing, and I was in his office, and I -- I mentioned the -- the -- the -- the -- the -- the Twitter stuff that had just started at that point. And he said -- he -- he was very much in agreement, he was like, it's a bunch of garbage. I know, it's -- it's just, what a bunch of garbage. And

we both agreed that it was, you know, just unfortunate fan garbage.

Q. This was not the first time that this sort of what you called fan garbage had come out coincident with the release of a movie where you provided a voice -- voice?

A. Or an anime series. Not a movie, but anime series.

Q. Anime. So this had happened before?

A. Yes, sir.

Q. And so did you have any other conversations with Funimation at that time?

A. Not that I recall, no, sir.

Q. What does Justin Cook do for Funimation?

A. He's -- you know, he kind of oversees all of the directors, I -- I believe. I'm -- I'm kind of embarrassed to say that I don't know what his actual title is. I want to say head of production, but I -- I don't think -- I don't know if that's it for sure. He's been there many -- he and I have been friends, I believed, for a very long time.

Q. When was the next time you had any contact from anyone at Funimation about the -- the social media uproar that was going on?

A. When the human resources woman called me and

said that -- that someone from Sony wanted to have a conversation with me.

Q. And was the next contact after that human resources call the communication you got from Tammi Denbow at Sony?

A. Yes, sir.

Q. And then -- did you then participate in an interview with Ms. Denbow?

A. We had a phone conversation where she raised the three incidents.

Q. How long did that phone conversation last?

A. Maybe half an hour, 40 minutes. I -- I don't recall, specifically.

Q. Was anyone on the phone besides you and Ms. Denbow?

A. No, sir.

Q. Did you take any notes?

A. No, sir.

Q. How did that phone conversation end?

A. With her saying that they would -- that she would take the information she gathered from me and review -- and review it with other people, I don't know who, and get back to me with their decision on it.

Q. Did you consider yourself honest and truthful in your communications with Ms. Denbow?

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A. Absolutely.

Q. Did you, in that conversation, explain to Ms. -- to Ms. Denbow that you sometimes had hugs and kisses with fans at anime conventions?

A. Probably.

Q. Tell me, how is it that you get signed up to be a participant at -- at an anime convention.

A. The convention organizers will contact people in the industry and invite them to come for the purpose of, you know, attracting fans to come and meet the guy who wrote this show, or the woman who directed that show, or the guy who played this character in this show, or this artist, or --

Q. Who handles it for Vic? Do you, Mr. Mignogna, take the phone calls and get the text messages yourself or do you have somebody who handles this for you, like an agent?

A. The vast majority of them are me, and it's because I've been doing it since they started. Even Monica and -- can tell you that when we started in this industry 20 years ago, there were only a handful of -- very few con -- anime -- anime-specific conventions.

And they were much smaller, they were in hotels and, you know, very small venues. And the conventions would contact us and just basically say,

we'll give you a hotel room and we'll buy you a plane ticket, that's about all we got for you. And -- and so we would go and sign autographs and do Q and A sessions with the fans and talk about Dragon Ball, or whatever show the fans were interested in.

And over the years, the conventions continued to grow, they kept popping up and -- but I had a relationship with a large number of the convention organizers personally.

Q. So they would just contact you directly?

A. Yes, sir.

Q. And would they do it via email, via telephone call, via text message?

A. Every way.

Q. And so I understand from your earlier testimony, for some of those conventions you actually had a written contract, fair?

A. Not back then.

Q. I'm talking about in January 2019 --

A. Yes, sir.

Q. -- until today.

A. Yes, sir.

Q. Fair?

A. Yes, sir.

Q. You had a contract with many of them?

A. Yes, sir.

Q. And then some of them you didn't have a contract, it was more of just a verbal agreement?

A. Yes, sir.

Q. When a convention canceled you, beginning -- I think you say the first one canceled you in -- on January 18th of 2019, and that was the Phoenix Fan Fusion event, how did that get communicated to you?

A. The organizer, Matt Solberg, called me.

Q. For any of the conventions that you claim were canceled as a result of the -- the tweeting by any of the parties here, or social media uproar, have you kept records of the -- the communication, like the -- the text message or the email?

A. I feel like I have to -- to a degree. There have been some of these conventions, a number of them this year, the ones that we're speaking of right now, that the men -- the men -- the gentleman that I mentioned earlier, Gary Hassen, had represented me to those events. And they contacted him, told him that they were canceling my appearance, and he called me and said, Megacon has canceled you or Emerald City has canceled you.

Q. For example, when you say in your petition that Anime NYC and Anime Milwaukee canceled your appearance

on January 30th, 2019, are you referring to a text message, an email or a phone call?

A. Anime NYC emailed me.

And what were the other ones you mentioned, sir?

Q. Anime Milwaukee.

A. Anime Milwaukee? I honestly don't remember whether they called me or sent me an email.

Q. Do you know whether you were signed up or slated to appear at Anime Milwaukee as of January 30th, 2019?

A. I can -- I can -- I can check my schedule. If I was canceled, I can only assume that I was scheduled to go.

Q. And in terms of the person who would have the records of being scheduled and being canceled by a particular convention, that would be you?

A. Yes -- well, for Anime Milwaukee, yes, sir.

Q. Which ones did this gentleman, Gary Hassen, handle for you?

A. Gary Hassen only handled the pop culture events, like a multi-genre event. I -- I -- he -- I -- I never wanted him to involve himself with the anime-specific conventions, mostly because it's a different -- it's a completely different dynamic, and I

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had an ongoing long relationship with a lot of the organizers myself, and --

Q. Fair. I take it within a -- you've testified that within a few days of your conversation on the telephone with Ms. Denbow, you had a further conversation with the folks at Funimation, where they communicated to you that they were terminating your relationship, fair?

A. No, sir. I did not speak with Funimation. A couple of days after my initial conversation with Ms. Denbow, she called me back, and there was someone else on the line, a gentleman. I -- I don't remember his name. And they were the ones on the phone that informed me that my employment with Funimation was terminated.

Q. Was Karen Micah on the phone?

A. Maybe. Possibly.

Q. Was Zack Hall from Sony on the phone?

A. I don't remember the names.

Q. What do you recall about what they told you?

A. They told me, quote, We have finished reviewing the -- the situation and concluded that your termination -- your employment with Funimation is terminated, effective immediately.

Q. Now, you said employment. At the time, you had an independent contractor agreement with Funimation; is

that right?

A. Yes, sir.

Q. You weren't like a W-2 employee where they provided you benefits; you got paid by the hour --

A. Yes, sir.

Q. -- for your voice acting, fair?

A. Yes, sir. Sorry.

Q. And then did Funimation make any public statement at the time that it terminated you?

A. No, sir. In fact, as I mentioned earlier, they told me on the phone that they had no intention of making any public statement, and I didn't either.

Q. Did you, thereafter, make any public statements about the social media uproar situation that was going on?

A. Relating to what specifically?

Q. Relating to Funimation's termination of the relationship.

A. No, sir.

Q. Did you --

A. I was rather ashamed. I was embarrassed.

Q. Got it. You have a personal Twitter account, I take it?

A. Yes, sir.

Q. And you, from time to time, have issued tweets

that relate to the social media uproar that we've been talking about today; is that fair?

A. Yes, sir.

Q. Mr. Lemoine asked you some questions about this subject matter. I don't really want to go into it in detail. But my understanding from looking at these posts and some of the tweets is that there was quite a bit of turmoil and strife between the #kickvic supporters and the #istandwithvic supporters; is that fair?

A. Yes, sir.

Q. Were you concerned about that at any time?

A. Yes, I was.

MR. VOLNEY: So what's the next exhibit number?

MR. BEARD: 24 [sic].

MR. VOLNEY: 24. Can I have a sticker?

(Exhibit 27 marked.)

Q. (BY MR. VOLNEY) Right here it's going to show you Exhibit 24. Is this a tweet that you published on February 8th, 2019?

A. I assume so, yes.

Q. In your tweet you say that it has come to your attention that there have been threats made toward others by fans in support of me. Do you see that?

A. Yes, sir.

Q. What are you referring to there?

A. I had heard just through the normal, you know, gossip and interaction that -- that people were making threatening statements.

(Sneeze.)

THE WITNESS: Bless you.

MR. JOHNSON: Bless you.

A. I had not seen any of those statements. I -- I don't even -- honestly, don't even know if such statements ever existed. I never saw any. But all you need to do is tell me, hey, your fans have threatened to do this, and I -- and I tweeted, hey, don't do that.

Q. (BY MR. VOLNEY) Part of the point of this February 8th tweet is to let the folks -- any folks who might be engaged in threatening or intimidating behavior, that they shouldn't do that, fair?

A. Let me be clear, perfectly clear. I would never condone that.

Q. And that's, in fact, what you say in the tweet?

A. Yes, sir.

Q. And do you know if this particular tweet had any effect on that sort of online fighting that was going on?

A. I don't know. I hope so.

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MR. BEARD: Counsel, this should be 27, not 24.

(Discussion off the record.)

Q. (BY MR. VOLNEY) Now, we spent a lot of time today talking about Monica Rial and Jamie Marchi.

What is it that you allege that Funimation did to harm you or to defame you?

A. After -- well, first of all, I don't believe they really had any legitimate reason to do what they did. After the conversation ended with Ms. Denbow, I honestly believed that when they called me back they were going to say you're on some kind of probation for a year, you know what I mean, and if we have any other complaints, then -- you know what I mean? That's really what I thought would happen.

So when -- when they terminated me, you know, I was -- I -- surprised, to say the least. And the last thing she said was, like I mentioned earlier, we're not going to be making any public statements. And then a week later, roughly, a week or 10 days later, Funimation, someone at Funimation, from Funimation's account, tweeted that I was being replaced, and they continued to tweet that they don't condone sexual harassment, which, you know, any reasonable person would infer that that's what they were terminating me for.

And -- and that did an enormous amount of damage.

Q. Let me ask you, let's look at Exhibit 7. It should be in that notebook in front of you. Is that the February 11 Funimation tweet, Exhibit 7?

A. Yes, sir. Yes, sir.

Q. Does Funimation, anywhere in that Twitter thread, use the word sexual?

A. No, sir.

Q. Do you know whether Funimation condones any kind of harassment or threatening behavior being directed at anyone?

A. I don't know. I would -- I don't know.

Q. I think you testified earlier that with respect to the -- the first tweet on this page, Exhibit 7, there's nothing untrue about that particular statement, fair?

A. Yes, that was just a statement of fact, that I had been recast in that show.

Q. And then looking at the subsequent tweets, you would agree with me that there's nothing untrue about the following statement, part of our core mission is to celebrate the diversity of the anime community and to share our love for this genre and its positive impact on all, fair? Nothing untrue about that?

A. Nothing what about it?

Q. There's nothing untrue about that.

A. I can't speak to what Funimation's core mission is. I mean, only Funimation can do that.

Q. Okay. Fair. Do you -- do you share that core mission yourself?

A. Absolutely.

Q. And with respect to the second sentence of the next tweet, which I think is clarified at the bottom, Funimation makes the statement, we do not condone any kind of harassment or threatening behavior being directed at anyone. Do you see that?

A. Yes, sir.

Q. They don't mention Vic Mignogna in that sentence at all, do they?

A. No, sir.

Q. And what your argument is, that you must infer that they're referring to your conduct, fair?

A. Yes, sir.

Q. Now, is this the only public statement that Funimation has made about the Vic Mignogna situation, that you're aware of?

A. As far as I know, yes.

Q. Certainly, from February 11th, 2019 to today, there have not been any other tweets by Funimation --

A. No, sir.

Q. -- that you're aware of, fair?

A. No, sir.

Q. I just have a few follow-up questions here and I think we can wrap this up. If a particular convention terminated you before February 11th, 2019, you would have to agree that that -- that particular convention did not terminate you because of Funimation's tweet, fair?

A. Not necessarily.

Q. Why do you say that?

A. Well, if someone from Funimation privately contacted a convention and said, we're not going to sponsor your show if you have this guy, and then the convention contacts me and says, we're not having you; now, I don't know that that happened, but I don't know that it didn't, so not necessarily.

Q. Well, assuming that didn't happen and the only public statement by Funimation about its termination of you is this February 11th tweet, then Funimation's communication could not have caused a termination of a convention that -- that occurred to you before February 11th, fair?

A. No, I'm not going to assume that that didn't happen.

Q. Do you have any personal knowledge of any such

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event occurring?

A. Not yet, but I -- I have been -- as I mentioned earlier, I -- I have heard rumblings from the convention community and organizers and my -- and Gary Hassen that a sponsor, a large sponsor, who was fostering relationship with one of the large convention organizers put enormous pressure on the conventions not to have me.

Q. Is --

MR. BEARD: John?

MR. VOLNEY: Yes.

MR. BEARD: I don't think he understood the question. If I could jump in.

He's asking did the tweet itself, just the tweet, cause any damage before it was sent out?

MR. VOLNEY: Right.

THE WITNESS: No, I thought -- no --

Q. (BY MR. VOLNEY) Yeah, okay, so let me back up because it was a long question. It was a long question.

A. I thought you asked me if Funimation couldn't have had any involvement before the tweet, and my answer is, sure they could, privately, in closed back channels.

Q. Right. But in terms of what you know, you don't know any specific conduct by Funimation that occurred privately in back channels to somehow stymie you from getting a convention job or keeping a

convention job, fair?

A. We -- I'm so sorry, John, please say it again.

Q. It sounds to me like you've heard rumors or you've made assumptions that Funimation may have done something privately as a sponsor of a convention to get you canceled, fair?

A. Yes, sir.

Q. Other than rumors, do you have any other evidence of that sort of behavior by Funimation?

A. Not at present.

Q. Who at Funimation would even do that?

A. I would encourage you to look at some of the statements made by Monica Rial and Jamie Marchi and Ron Toye, talking about Funimation this and Funimation that, and Funimation knows this, and everybody at Funimation that, and, I mean, they have -- they have, you know -- what's the word I'm looking for, brandished the Funimation name and, you know --

Q. Is --

A. And -- and I'm quite certain -- I'm -- I'm sorry.

Q. Go ahead.

A. I -- I -- I can only -- again, I can only assume, I think a reasonable person would assume that there were entities at Funimation that did not like me

for whatever reason and wanted me gone. Did not want me to play the character Broly that I had been playing for 15 years. And I -- I -- so to ask me the question, your question was, who at Funimation would do that --

Q. Well, when you say --

A. -- I think it's been established there are people at Funimation that don't like me much and wanted me gone.

Q. Well, when you say that there are people at Funimation who don't like you much and wanted you gone, who are you referring to specifically?

A. Chris Sabat.

Q. Is he a Funimation --

A. Oh, I would --

Q. -- employee?

A. I would say he has a great deal of weight at Funimation, a great deal of weight. And, I mean -- yes, he is, probably. Funimation outsources production to his studio. Chris Sabat has been involved with Funimation since Funimation was in the Frost Bank building in -- you know, on 820, when I started working there. So Chris Sabat, for one.

Q. Who else?

A. I would say other voice actors and directors.

Q. Can you name names?

A. Do I have to? I mean, I'm not --

Q. Yeah, I mean --

A. -- a name namer. I'm not that kind of a person.

Q. This is kind of a bridge-burning exercise we're going through so let's burn the bridges.

A. Yeah, the bridge is kind of burned, isn't it?

Q. Yeah. I have to say this is my chance to ask you questions.

Who besides Chris Sabat at Funimation?

A. I would wager that voice actors like Monica Rial, Jamie Marchi, Michael -- J. Michael Tatum, by their own admission on the -- on the Twitter storm, other voice actors that have been employed by Funimation for many, many years, Mike McFarland, Colleen Clinkenbeard, Daman Mills, Sean Schemmel.

See, what -- what Funimation may not get is that these voice actors have been employed by them for many years, and when they speak, the public at large sees Funimation.

Q. Got it. Is Ron Toye a voice actor?

A. No, sir.

Q. What is he? What does he do for a living?

A. I don't know.

Q. Does he -- does he have any business type of

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relationship with Funimation?

A. I don't know. I don't even really know him.

Q. So do you ever go to Funimation -- when you were working for Funimation, I take it you would occasionally go to their studios?

A. Yes, sir.

Q. Did you ever see Ron there?

A. Not to my recollection, unless I passed him in the course of, you know, in the hallway. He's Monica's boyfriend. That's -- that's his connection here, as far as I know.

Q. Okay. So in terms of what you know about Ron's connection to Funimation, it is that Ron is Monica Rial's boyfriend?

A. That's my only knowledge of Ron Toye.

Q. And, to your knowledge, Monica is a voice actor who occasionally works on an hourly basis for Funimation, fair?

A. No, sir. She works a lot, for many years, and has directed at Funimation. I -- I would bet --

Q. Similar to your relationship with Funimation that you talked about earlier?

A. Sure. Yes.

MR. VOLNEY: Okay. Those are all the questions I have. Thank you.

THE WITNESS: Thank you, John.

MR. LEMOINE: Nothing further.

MR. JOHNSON: We'll reserve.

MR. BEARD: Pass the witness.

You're done.

THE VIDEOGRAPHER: And we're going off the record at 5:39 p.m.

(Deposition concluded at 5:39 p.m.)

CHANGES AND SIGNATURE

WITNESS NAME: VICTOR MIGNOGNA DATE: JUNE 26, 2019

PAGE	LINE	CHANGE	REASON

I, VICTOR MIGNOGNA, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

_____
VICTOR MIGNOGNA

THE STATE OF _____)
COUNTY OF _____)

Before me, _____, on this day personally appeared VICTOR MIGNOGNA, known to me (or proved to me under oath or through _____) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, _____.

_____
NOTARY PUBLIC IN AND FOR
THE STATE OF _____
COMMISSION EXPIRES: _____

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NO. 141-307474-19

VICTOR MIGNOGNA, Plaintiff,) IN THE DISTRICT COURT
VS.) TARRANT COUNTY, TEXAS
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, and RONALD TOYE, Defendants.) 141st JUDICIAL DISTRICT

REPORTER'S CERTIFICATION
DEPOSITION OF VICTOR MIGNOGNA
JUNE 26, 2019

I, Claudia White, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, VICTOR MIGNOGNA, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature and return to CSI Global Deposition Services by _____;

That the amount of time used by each party at the deposition is as follows:

Mr. Ty Beard, Esq. - 00 HOURS:00 MINUTE(S)
Mr. J. Sean Lemoine, Esq. - 03 HOURS:40 MINUTE(S)
Mr. Sam Johnson, Esq. - 00 HOURS:30 MINUTE(S)
Mr. John Volney, Esq. - 00 HOURS:30 MINUTE(S)
That pursuant to information given to the

Deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

Mr. Ty Beard, Esq., Attorney for Plaintiff
Mr. J. Sean Lemoine, Esq., Attorney for Defendant Monica Rial and Ronald Toye
Mr. Sam Johnson, Esq., Attorney for Defendant Jamie Marchi
Mr. John Volney, Esq., Attorney for Defendant Funimation

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule 203 of TRCP will be certified to after they have occurred.

Certified to by me this 1st day of July, 2019.

Claudia White, Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was/was not returned to the deposition officer on _____;

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition was delivered to Mr. Sean Lemoine, Custodial Attorney;

That $_____ is the deposition officer's charges to the Defendants for preparing the original deposition transcript and any copies of exhibits;

That the deposition was delivered in accordance with Rule 203.3, and that a copy of this certificate was served on all parties shown herein on and filed with the Clerk.

Certified to by me this _____ day of _____, 2019.

Claudia White
Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsciences.com

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4:29 235:15
235:16
4:37 235:16
4:38 235:19
40 129:13
146:25
147:1
162:23
223:23
268:12
40- 158:18
158:23
400 157:22
41 4:14
42 8:16,17
8:18
42nd 8:21
43 8:19
47 4:18
4950 290:21
291:21
4chan 202:6
4th 178:24

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5 4:11
165:20
166:12
167:8
174:21
176:9
197:3
209:19
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290:19
291:20
5:39 1:17
286:7,9
50 124:24
129:14
160:10
50-year-old
146:3
158:19,23
500 27:16
159:4
509-4900 2:7
51 129:14
526 290:20
291:20
55 262:21
56-year-old
169:13,21
5th 178:22

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6 4:11 81:17
163:10
178:9,12
178:17
179:5
187:5,17
187:18
192:1
210:16,17
211:5
235:18
600 35:1
60s 234:1
65 4:13
650-0225
290:22
291:22
672-2000
2:18
692-6200
2:13
6th 87:20
247:5
249:1
260:5

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7 4:12
106:17
180:9
181:11
191:9,16
192:17
278:2,4,14
70 103:6
7161 3:9
750 2:22
75024 3:10
75062 290:21
291:22
75201 2:22
3:5
75202 2:17
75204 2:12
75703 2:6
784-0004
290:22
291:22
7th 250:1

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8 4:12
138:12,16
169:8
183:13
191:9
192:8
193:9
194:19,20
208:15
224:10
245:2
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80 4:15
103:6
820 283:21
8242 290:19
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86 4:16
11:25
20:11
87 11:25
877 290:22
291:22
8th 206:16
252:4
275:21
276:15

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9 4:13 138:7
138:10,13
171:8
192:9
193:9
197:6
262:3,6
9:05 247:5
901 2:16
903 2:7
918-5274
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95 19:25
972 3:11
290:22
291:22
981-3839 3:6

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Exhibit L

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ToraSan @x_Tora_San_x · Apr 18
@Rialisms Hey Monica I heard the news and my only hope is when the truth comes out, can you at least promise me that Vic won't get hurt. As much as what he did was wrong, I don't like seeing people get harmed in any way.

4 1 10

Monica Rial @Rialisms · Apr 18
I can't promise anything. I mean, he won't be physically hurt or anything. It's just a court case. 🤦‍♀️

2 2 14

ToraSan @x_Tora_San_x · Apr 18
Then I hope I'm not selfish by saying that all this case needs to do for you is that Vic just has to tell the truth, denounce these liars making you look like the bad guy, seek help and start a new life.

1 1 8

Monica Rial
@Rialisms
Following

Replying to @x_Tora_San_x

The truth will come out now. All of it. ❤️

8:14 PM - 18 Apr 2019

1 Retweet **29** Likes

14 1 29

Tweet your reply

ToraSan @x_Tora_San_x · Apr 18
Replying to @Rialisms
Monica, there is no doubt I know you've been doing nothing but tell the truth. But if the truth from FUNi's investigation is so important to trolls, so be it.

1 1 4

ToraSan @x_Tora_San_x · Apr 18
But overall, this scandal should teach the anime community an important lesson. Hero worship is unhealthy and we usually don't have any idea what happens when the crowds are gone and the cameras stop rolling.

3 1 8

ToraSan @x_Tora_San_x · Apr 18
And honestly, if I could go back in time. I would prevent literally every single incident. Including what happened to you as a teenager. This way everything would be at peace.

1 1 3

Saint_Beard @SaintBeard1 · Apr 18
So as a thought exercise, purely hypothetical; If it came out through court

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Exhibit M

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8

shawnbarnett @Odd_oneShawn · Feb 7

Replying to @marchimark

Idk if it true or not. But people are harassing Vic and Todd. I seriously don't like it.

2 3

Jamie Marchi @marchimark · Feb 7

I give no shits if they're harassing Vic. He's a monster. Look around: there are dozens upon dozens upon dozens of reports. If you don't see it, you simply don't want to. It's true.

6 1 16

shawnbarnett @Odd_oneShawn · Feb 7

So what about Todd then ?

Richard Kickem @thedamagewithin · Feb 6

Replying to @marchimark

Vic's idiot fanbase has done more to help damage his legacy than anything else.

1 4

Sean M. Cogan @SuperSleuthSean · Feb 7

I'm starting to actually pity some of these Risembool Rights Activists. Anyone deluded enough that it's easier for them to believe that a hundred people are lying about one man than it is for them to believe that one man is lying to them. #smdh

1 1

Richard Kickem @thedamagewithin · Feb 7

It's hard to accept somebody you admired turned out to be horrible, but this is more like blind worship. No matter who I look up to, they're not infallible.
And I can guarantee these people are more in love with the characters he voices than they are with him.

1 1

Jamie Marchi @marchimark · Feb 7

Try to keep in mind a lot of these fans of his have been basically indoctrinated. He is a master manipulator, which is why he's been able to get away with it for so long. They are victims of his sociopathy. I think they'll eventually see the light, but it may not be for awhile.

3 5

Dawn Ruzena SOON**AWA** @dawn_ruzena · Feb 7

It's a case of cult personality. And it's scary. He draws them in, those who need

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Exhibit N

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Follow

Monica Rial
@Rialsms

Keeping child actors out of work since the 90's... For convention appearances, please contact info@primetimeappearances.com #Bulma #Froppy #Mira #Sakura

Dallas/Houston/THE WORLD · theMonicaRial.com · Joined April 2012

802 Following **55.1K** Followers

Tweets | Tweets & replies | Media | Likes

Monica Rial @Rialsms · 13h
Replying to @nightblur @RaihanH98 and 3 others
I've worked with Rooster Teeth since 2017.
17 3 37

Monica Rial @Rialsms · 13h
Replying to @jace_magee and @jaysherman93
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
25 1 11

Monica Rial @Rialsms · 13h
And just so we're clear, he's the legal definition of harassment: Harassment is governed by state laws, but is generally defined as a course of conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety.
414 99 1K

Show this thread

Monica Rial @Rialsms · 13h
Replying to @crateguy
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
24 46

Monica Rial @Rialsms · 13h
Replying to @ComdeyBou61 and @Linkintallica95
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
9 5

Monica Rial @Rialsms · 13h
Replying to @RoboticoIgamer and @ChambersofHeart
"Harassment laws, which vary by state, are defined as a course of conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety."
10 2

Monica Rial @Rialsms · 13h
Replying to @RoboticoIgamer and @ChambersofHeart
I've never deleted a Tweet. :)
7 2

Monica Rial @Rialsms · 14h
Replying to @KendamuZ
Love you, Josie. <3
2 1 15

Monica Rial @Rialsms · 14h
Replying to @CoffeeBeanShow and @probloodxwolf
There were investigations conducted by multiple companies with evidence, testimony, and proof. There were dozens of men and women participated. The companies don't have to share that information with you because you're not an attorney or law enforcement.
24 4 25

Monica Rial @Rialsms · 14h
Replying to @BelmontTobias and @Wesleydeaguayo2
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
14 3

Monica Rial @Rialsms · 14h
Replying to @WilliamSotoma12 and @KendamuZ
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
4 3

Monica Rial @Rialsms · 14h
Replying to @WilliamSotoma12 and @KendamuZ
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
6 4

Monica Rial @Rialsms · 14h
Replying to @probloodxwolf
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
101 7 213

Monica Rial @Rialsms · 14h
Replying to @ChambersofHeart
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
20 1 89

Monica Rial @Rialsms · 14h
Replying to @Powerbombfan
Thanks for the tweet! I've screenshot it and sent it to my attorney and law enforcement. I will not be harassed. Have a nice night!
5 4

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Exhibit O

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CAUSE NO. **141-307474-19**

VICTOR MIGNOGNA, Plaintiff,	§	IN THE DISTRICT COURT
v.	§	141st JUDICIAL DISTRICT
FUNIMATION PRODUCTIONS, LLC, JAMIE MARCHI, MONICA RIAL, AND RONALD TOYE, Defendants	§	TARRANT COUNTY, TEXAS

AFFIDAVIT OF STAN DAHLIN

STATE OF GEORGIA §
COUNTY OF DEKALB §

On this day, Stanley Charles Dahlin, Jr., personally known to me to be the affiant herein, appeared before me and, after being sworn according to law, on his oath, deposed and said as follows:

(1) My name is Stanley Charles Dahlin, Jr., and I reside in Dekalb county, Georgia. I am over the age of eighteen years and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and these facts are true and correct.

(2) I have read Monica Rial's response to Interrogatory number 4 contained in "Monica Rial's Amended Objections And Responses To Plaintiff's First Interrogatories And Requests For Production," in Cause No. 141-307474-19 in the 141st District Court of Tarrant County, Texas (the Response"). This Response is attached to my affidavit as Exhibit A.

(3) I was the owner of Izumicon in Oklahoma City in November 2007.

(4) Monica Rial and Victor Mignogna were both guests at that convention.

(5) I have no memory of the events described in bullet point 4 of the Response.

(6) If I had noticed Monica Rial being distressed leaving Victor Mignogna's room, I am certain that I would remember it.

(7) In subsequent years, I invited Monica Rial and Victor Mignogna back to my conventions several times. I would never have done this if I had been informed of any problems between Monica Rial and Victor Mignogna.

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Affiant

Printed name: Stanley C Dahlin Jr

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned Notary Public in and for the State of Georgia, on this 18th day of July, 2019, by Stanley Charles Dahlin, Jr., the affiant named above, to which witness and certify my signature and official seal.

[seal]

NOTARY PUBLIC
STATE OF GEORGIA

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INTERROGATORY NO. 3. Identify all persons who witnessed the incidents identified in your answer to Interrogatory No. 2.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff has exhibited the described behavior too many times to recount, and in front of too many people to recall.
- Plaintiff exhibits the described behavior without warning, in private or in public, and often in front of unknown fans in order to prevent his victims from resisting or causing a scene.
- Defendant has personally spoken with fans following incidents, but Defendant cannot know all such people, or be able to contact all such witnesses.
- For example, following the incident at Louisville Supercon described in Defendant's response to Interrogatory No. 2 above, a male fan witnessed Plaintiff exhibiting the described behavior, and inquired whether Defendant would like for the male fan to confront Plaintiff about the inappropriate behavior. It is impossible to know how many other fans have witnessed this conduct.
- *See also* Toye's Amended Objections and Responses to Plaintiff's First Interrogatories and Requests for Production, and Documents Bates labeled TOYE 000001-000042, attached thereto.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 4. Identify the instance in "the mid-2000s"—including the name of the convention—when Plaintiff "grabbed [you] and kissed [you] in his hotel room" as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it seeks information that is in the possession of Plaintiff and equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff grabbed and kissed Defendant without Defendant's consent on Sunday, November 4th, 2007 while Plaintiff and Defendant were both attending Izumicon in Oklahoma City, Oklahoma.
- After several other guests had left Oklahoma City, Stan Dahlin, one of the convention chairmen, invited Plaintiff and Defendant to dinner. Plaintiff requested that Defendant accompany Plaintiff to Plaintiff's hotel room to view Plaintiff's fan film called "Fullmetal Fantasy." Mr. Dahlin stated that he would collect us both for dinner from Plaintiff's hotel room.

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- Plaintiff played the video as promised while Defendant stood to watch the video. But Plaintiff soon grabbed Defendant by the upper arms and began aggressively kissing Defendant. Defendant attempted to resist, but Plaintiff physically restrained Defendant and pushed Defendant backward toward the bed. Plaintiff climbed on top of Defendant and held her down as he continued to aggressively kiss Defendant.
- Plaintiff continued in this fashion for several minutes, despite Defendant's fear and shock, until Mr. Dahlin knocked on Plaintiff's hotel door. Plaintiff left Defendant on the bed, and hurriedly answered the door. Mr. Dahlin inquired whether Defendant was ok, clearly noticing distress. Defendant, however, was too shocked and afraid to admit to what had occurred.
- Following dinner, Plaintiff forced Defendant to speak with Plaintiff's longtime fiancée on the telephone, and Plaintiff spoke with his fiancée as if nothing had happened.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 5. Identify all persons who witnessed the incident identified in your answer to Interrogatory No. 4.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff waited until Defendant was away from the many other guests and friends who attended the convention before he forced himself upon Defendant. Several guests and friends noticed Plaintiff's behavior leading up to this incident, but other than Mr. Dahlin, Defendant cannot know who may have known about Plaintiff's intentions.
- *See also* Toye's Amended Objections and Responses to Plaintiff's First Interrogatories and Requests for Production, and Documents Bates labeled TOYE 000001-000042, attached thereto.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 6. Identify the "three of [your] close friends" who "came forward" and "shared their stories with [you]" after "the premiere for the Broly movie" as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

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Exhibit P

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Unsworn Declaration

1. My name is Erica Nicole McCord.

2. I have read the Affidavit executed by Faisal Ahmed on July 12, 2019, attached to this Unsworn Declaration and am familiar with its contents.

3. I have never been personal handler/assistant for Vic Mignogna ("Vic"). Any time I have served as his handler it was at a convention and as a representative of that convention. As such the only person I was answerable to was the person in charge of guest relations at said convention.

4. I have never been on the same airplane as Vic. I have never been flown to any convention where I was Vic's handler. Three conventions have ever flown me to their venues. Two of those conventions were ones owned and operated by Faisal Ahmed and at those conventions I was not Vic's handler. I was not Vic's handler at the third convention I was flown to, ColossalCon.

5. I have never been a "die-hard fan and admirer of Vic Mignogna". My prolific work with Vic was due solely to the fact that I had a strong understanding of the venues in which I volunteered and/or in my understanding of Vic's idiosyncrasies as they relate to conventions. My involvement on the Star Trek Continues series was limited to one episode and I joined that production because I loved Star Trek and believed I would be acting as organizer and liaison for cast and crew transportation.

6. I have no memory of making any request to Faisal Ahmed " not to be assigned to Mignogna or work with him directly anymore." It would be out of character for me to communicate directly with Faisal Ahmed about anything at a staff meeting. I made this statement to Natalee Aukerman, Director of Guest relations who was in charge of the American and Japanese guest handlers at Anime Weekend Atlanta, and several of Faisal's other conventions. The reason I made this request is that I was tired of being "pigeonholed" into handling Vic at conventions. I had also volunteered on an episode of Star Trek Continues and was scheduled to work with him at another event and I just wanted a change and the opportunity to work with other guests.

7. I have no memory of saying to Faisal Ahmed that "[Vic] was not who I thought he was". I would not have made such a statement to Faisal Ahmed.

8. I have never in my life been afraid of Vic Mignogna.

9. Vic never "forcibly kissed me without my consent...".

Jurat

My name is Erica Nicole McCord, my date of birth is December 17th, 1986 and my address is, 491-0033 Japan, Aichi Prefecture, Ichinomiya City, Betsumeichou 3-20, Esupoa Tanigawa 102. I declare under

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penalty of perjury that the foregoing is true and correct.

Executed in Ichinomiya City, Aichi Prefecture, Japan, on the 28th day of August 2019.

Erica Nicole McCord

Erica Nicole McCord, Declarant"

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McCord Affidavit

Exhibit A

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AFFIDAVIT OF FAISAL AHMED

STATE OF GEORGIA §
§
COUNTY OF GWINNETT §

Before me, the undersigned Notary Public, on this day personally appeared Faisal Ahmed, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Faisal Ahmed. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I am the CEO of the Kawaii Kon Convention and Anime Weekend Atlanta held in Atlanta, Georgia. I initially met Victor Mignogna ("Mignogna") on September 25th, 2004 at Anime Weekend Atlanta.

3. I have known about Mignogna's bad reputation with women and convention staff for many years. Around seven years ago, I was attending the Anime Central Convention in Rosemont, Illinois, and I saw Mignogna being overly friendly with a female cosplayer near the FUNimation booth. The cosplayer looked very uncomfortable with his actions, and I witnessed her tell Mignogna that she needed to go. I then witnessed the cosplayer quickly try to run away from Mignogna, and it appeared to me that she was removing herself from the situation to avoid a confrontation. I went to Sarah Sullivan, an employee at FUNimation at the time, and reported what I saw. Sarah Sullivan told me that this was normal for him. In response, I told her that if it happened at one of my conventions and shows, then I would not allow him back. Sarah Sullivan looked extremely exhausted and told me that I can make a complaint about it if I wanted to. I told her "okay." I did not hear anything afterwards about my report regarding Mignogna.

4. I have received complaints from attendees at Anime Weekend Atlanta and Kawaii Kon about Mignogna. For example, about four years ago at the Anime Weekend Atlanta, one of

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our volunteers, Erica McCord, in guest relations was also Mignogna's personal handler/assistant. She would fly with Mignogna and accompany him to other conventions as well as the Star Trek Continues set. This volunteer was a die-hard fan and an admirer of Mignogna, and I witnessed her defend him anytime someone complained about him being a diva or too demanding. However, one day she came up to me and said that while she loved Anime Weekend Atlanta and wanted to keep volunteering in guest relations, she requested not to be assigned to Mignogna or work with him directly anymore. She stated that "he was not who I thought he was," and when I pushed for more details as to why she felt that way, she was hesitant and uncomfortable to say anything. I believed that she was too scared to say anything further, so I dropped the matter. I learned from someone else last year that Mignogna had forcibly kissed her without her consent, and I believe this is why she did not want to work with him. While I was frustrated she did not tell me this sooner, I understood why she was hesitant to tell me because she knew I would not allow to invite him back to Anime Weekend Atlanta ever again.

5. I have also received complaints from attendants at the Kawaii Kon Convention. One complaint was from attendee, Kelly Loftus. Kelly emailed me and stated that Mignogna was grabby and touched and kissed her without consent, and she did not know what she should do. I have attached the emails I received from Kelly on January 28, 2019 to this statement as Exhibit A. Another complaint was from attendee, Leah Hamilton—also known as Leah Rose—who is a cosplayer. Originally, I knew Leah admired Mignogna, but he aggressively pursued her despite her rejecting him and both of them being in committed relationships. Leah publicly announced this incident and there was an enormous amount of media backlash against her and Kawaii Kon from Mignogna's fan base, also known as the "Vic Risembool Rangers."

6. Due to the two incidents at Kawaii Kon, the incident from Anime Weekend Atlanta,

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the incident I witnessed at Anime Central Convention, and other poor behavior we witnessed from Mignogna, I and the other management staff voted to ban Mignogna from Kawaii Kon and Anime Weekend Atlanta in the future. Neither Monica Rial, Jamie Marchi, Ron Toye, or FUNimation have contacted me to request that I ban Mignogna from any convention. I am not aware of any signed contract with Mignogna that guarantees Mignogna's appearance at Kawaii Kon or Anime Weekend Atlanta. The invitations for Mignogna to attend Kawaii Kon was made in the sole discretion of the management staff and could be withdrawn at any time without penalty.

7. Because I have independently agreed with Leah Rose and other victims, I have been targeted, stalked, and harassed by fans of Mignogna. For example, on April 4, 2019, a little before Kawaii Kon convention started, I received roughly 500 spam emails during a two hour period. I. I was also contacted by the State of Hawaii, because they received a complaint from one of Mignogna's fans because we banned him from attending. I had a meeting with the Management of the Hawaii Convention Center to discuss the complaint.

8. This concludes my affidavit testimony.

Executed in Gwinnett County, Norcross, Georgia on July 12, 2019.

Faisal Ahmed

SUBSCRIBED AND SWORN TO BEFORE ME on this 12th day of July 2019.

Notary Public, State of Georgia

Halle Kahssu

Printed Name

My Commission Expires: 1/30/2023

Halle Kahssu
NOTARY PUBLIC
DeKalb County, GEORGIA
My Commission Expires 01/30/2023

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Exhibit Q

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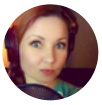
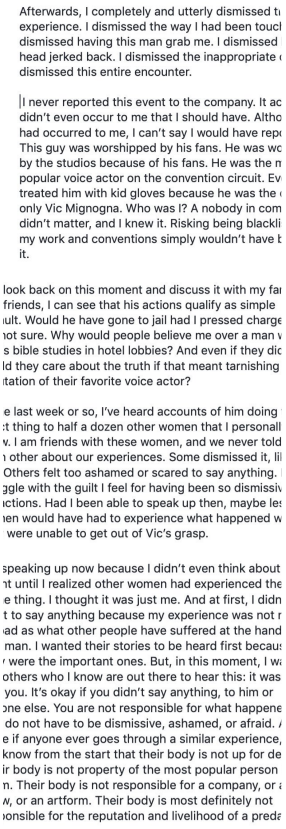


Jamie Marchi
@marchimark

Follow

I stand with the victims. My experience is minor in comparison to many others; however, having realized this wasn't an isolated incident, I felt compelled to share.

Several years ago, I was in the lobby at my job when I was approached by a co-worker. This guy gave me the creeps already (he gave almost all the women at my job the creeps), but I always felt like I had to be nice to him anyway because of how revered he was in the industry. As we said hello, he stood to the side of me and started running his fingers through my hair. Now, I do work in an affectionate industry; we hug a lot, and on occasion, will give a kiss on the cheek. But even for an affectionate environment, this felt off. I didn't say anything to him about it, though. It was just his fingers in my hair; I didn't think it was a big deal. At that point, he splayed his fingers, put his hand at the base of my skull, and made a fist. When he did this, he grabbed my hair close to the root, effectively preventing me from moving my head at all. He then jerked his fist, yanking my head backwards and towards him, and whispered something in my ear. I don't remember what he said specifically, but I do remember it being sexual in nature. This was not normal. This was not just a hug or a kiss on the cheek. I did not like it. I have no memory of getting out of his grasp, but I assume, "What the fuck are you doing?" was part of my technique.



Afterwards, I completely and utterly dismissed t
experience. I dismissed the way I had been touc
dismissed having this man grab me. I dismissed
head jerked back. I dismissed the inappropriate
dismissed this entire encounter.

I never reported this event to the company. It ac
didn't even occur to me that I should have. Altho
had occurred to me, I can't say I would have rep
This guy was worshipped by his fans. He was wo
by the studios because of his fans. He was the n
popular voice actor on the convention circuit. Ev
treated him with kid gloves because he was the
only Vic Mignogna. Who was I? A nobody in com
didn't matter, and I knew it. Risking being blackli
my work and conventions simply wouldn't have b
it.

look back on this moment and discuss it with my fa
friends, I can see that his actions qualify as simple
ult. Would he have gone to jail had I pressed charge
ot sure. Why would people believe me over a man
s bible studies in hotel lobbies? And even if they dic
ld they care about the truth if that meant tarnishing
itation of their favorite voice actor?

e last week or so, I've heard accounts of him doing
t thing to half a dozen other women that I personall
v. I am friends with these women, and we never told
other about our experiences. Some dismissed it, lil
Others felt too ashamed or scared to say anything.
ggle with the guilt I feel for having been so dismissiv
ictions. Had I been able to speak up then, maybe les
en would have had to experience what happened w
were unable to get out of Vic's grasp.

speaking up now because I didn't even think about
t until I realized other women had experienced the
e thing. I thought it was just me. And at first, I didn
t to say anything because my experience was not
ad as what other people have suffered at the hand
man. I wanted their stories to be heard first becau
were the important ones. But, in this moment, I w
others who I know are out there to hear this: it was
you. It's okay if you didn't say anything, to him or
one else. You are not responsible for what happene
do not have to be dismissive, ashamed, or afraid.
e if anyone ever goes through a similar experience,
know from the start that their body is not up for de
ir body is not property of the most popular person
n. Their body is not responsible for a company, or
w, or an artform. Their body is most definitely not
onsible for the reputation and livelihood of a preda

3:50 PM - 8 Feb 2019

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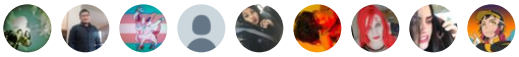

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Brandon @Brandon29641105 · Feb 9

Replying to @marchimark

"I just now spoke about this bc i just now remembered it bc everyone else is bandwagoning." classic "me too" statement. Sheep

1

Brandon @Brandon29641105 · Feb 9

but the way i see it is. You mean to tell me there are 100s of allegations with no

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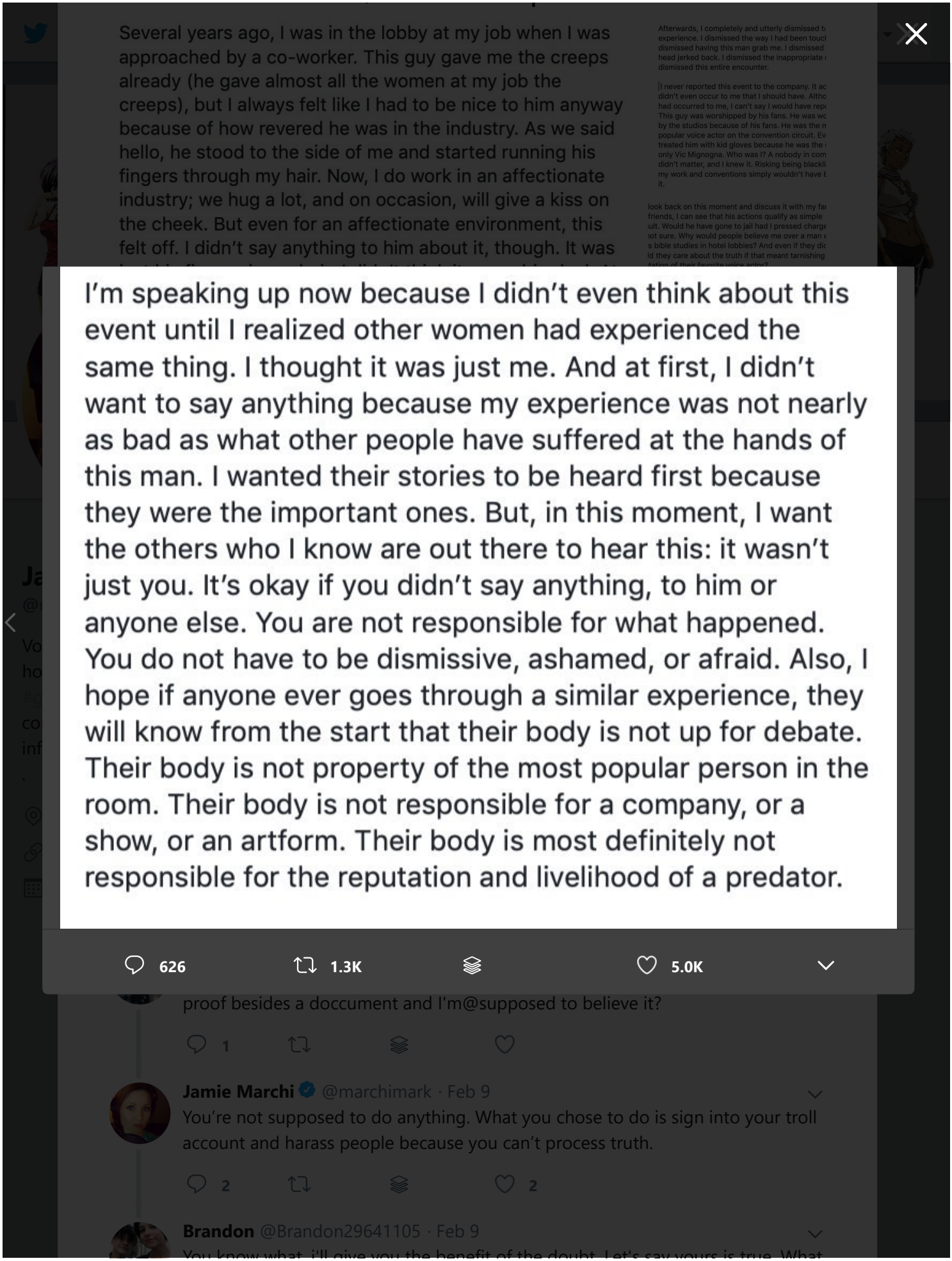

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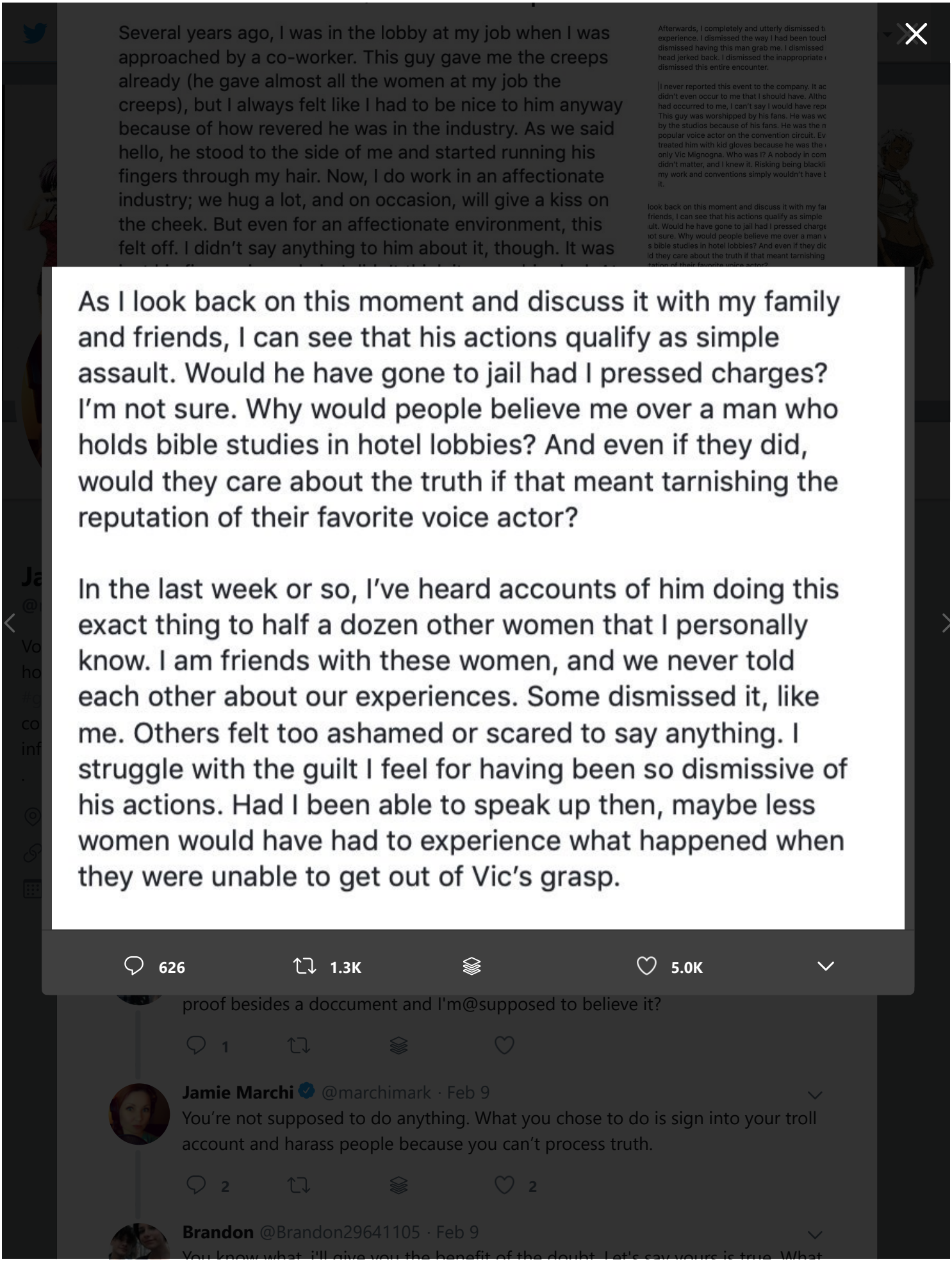

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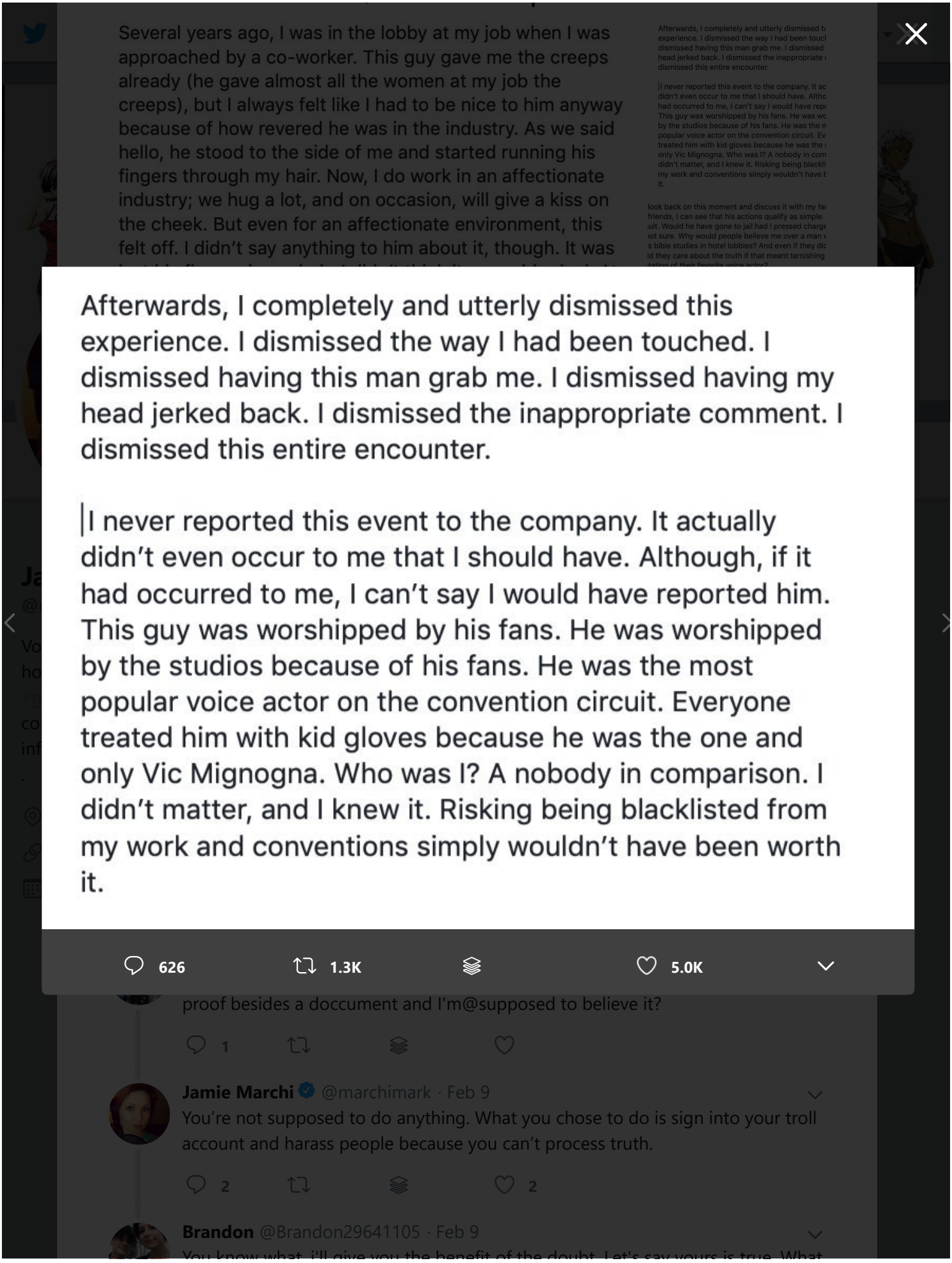

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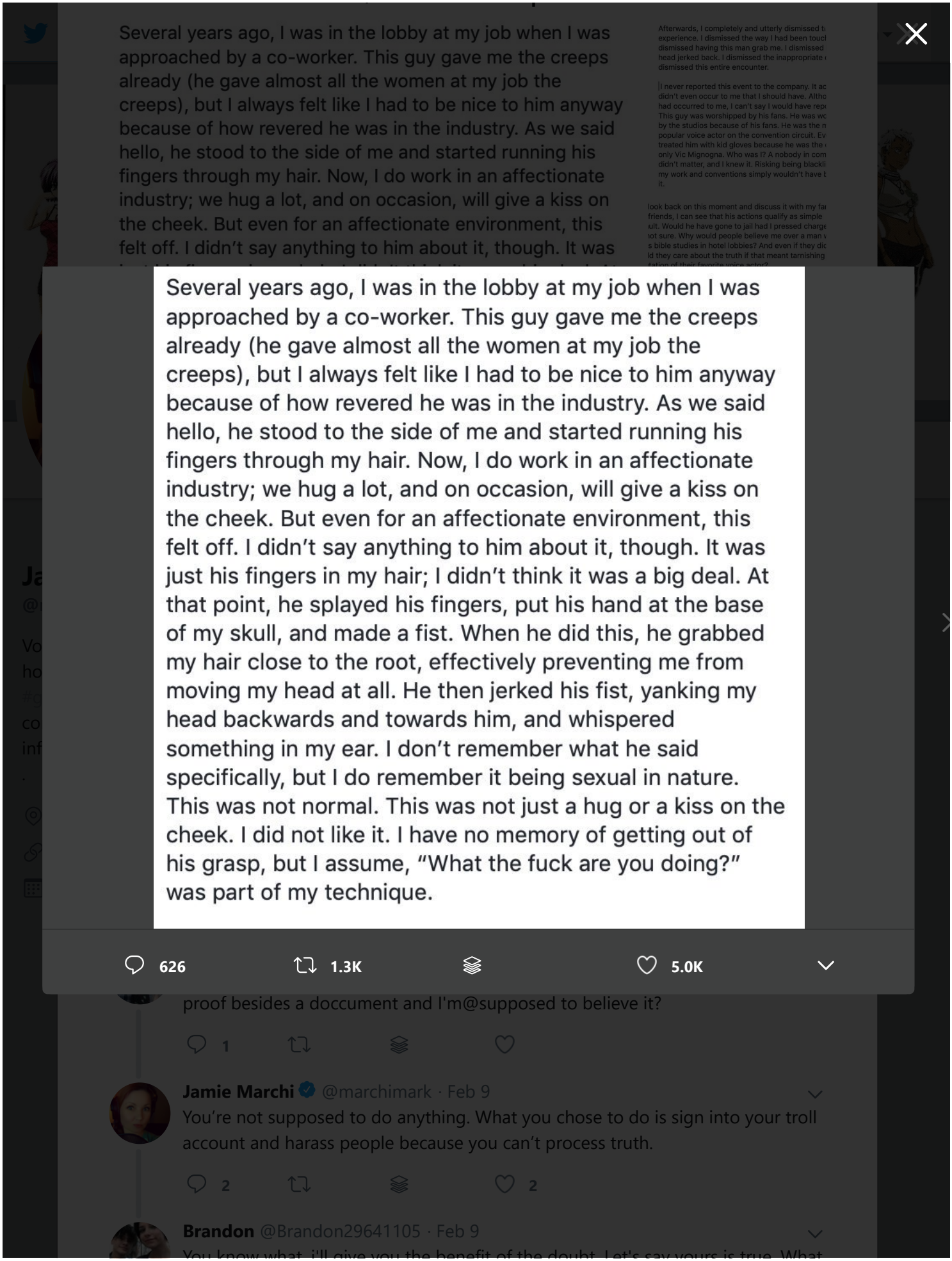

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