Transcript of the
Deposition of

Allison Dunavant

4/8/2019

Dunavant v. University of South Carolina, et al.
3:18-CV-01604-MGL

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Allison R. Dunavant, Plaintiff, v. University of South Carolina, The International Center For The Arts, LLC, David R. Voros, and Harris Pastides, Defendants.	Civil Action No.: 3:18-cv-01604-MGL Deposition of Allison Dunavant

Date: April 8, 2019

Time: 10:03 a.m.

Location: Cromer Babb Porter & Hicks, LLC
1418 Laurel Street, Suite A
Columbia, South Carolina

Reported by:
Darlene Pastel, CVR-CM

APPEARANCES

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Also Present: David Voros
Creighton M. Segars

INDEX

Stipulations: 4
Examination by Mr. Gessner: 4
Examination by Ms. Moose: 217
Examination by Mr. Wlodarczyk: 331
Examination by Ms. Albrecht: 382
Reexamination by Ms. Moose: 395

EXHIBITS

Defendants' Exhibit No. 1, Amended Complaint 13
Defendants' Exhibit No. 2, Messages Grudzinski-Hall 48
Defendants' Exhibit No. 3, Dunavant Statement 68
Defendants' Exhibit No. 4, Notice of Harassment 69
Defendants' Exhibit No. 5, EOP Report 83
Defendants' Exhibit No. 6, Email from Terrie Smith 97
Defendants' Exhibit No. 7, Photograph 132
Defendants' Exhibit No. 8, Photograph 182
Defendants' Exhibit No. 9, Letter from Dale Rhines 183
Defendants' Exhibit No. 10, Messages E. Dunavant 184
Defendants' Exhibit No. 11, Messages E. Dunavant 234
Defendants' Exhibit No. 12, Messages E. Dunavant 235
Defendants' Exhibit No. 13, Messages E. Dunavant 249
Defendants' Exhibit No. 14, Messages E. Dunavant 257
Defendants' Exhibit No. 15, Messages E. Dunavant 258
Defendants' Exhibit No. 16, Messages E. Dunavant 268
Defendants' Exhibit No. 17, Professional Materials 309
Defendants' Exhibit No. 18, Photographs 326
Defendants' Exhibit No. 19, Messages E. Dunavant 331

STIPULATIONS

It is stipulated by and between counsel for the respective parties that all objections are reserved until the time of trial, except as to the form of the questions.

- - - -

The reading and signing of this deposition is waived by the deponent and counsel for the respective parties.

Whereupon,

Allison Dunavant, being duly sworn and cautioned to speak the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION

BY MR. GESSNER:

Q Ms. Dunavant, good morning. My name is Evan Gessner. I'm an attorney in Lexington, South Carolina. I'm represent the University of South Carolina and Harris Pastides in this lawsuit. I'm here to take your deposition today.

Have you ever been deposed in any case?

A No.

Q First thing I'll say is that we have a court reporter here taking down everything we say. She's going to type up a transcript. And because of

that, there's a couple of things to remember. One is that we try to not talk over one another. We do it in everyday conversation. Try not to do it today. I'm as guilty of that as anyone else, but I'll do my best.

The other thing with a court reporter to remember is that saying uh-huh, uh-uh, nodding your head does not come across in the written record very well. So try and give a verbal response as best you can.

You are under oath, so your number one job today is to tell the truth. So if you need to give an approximate answer, please say that as best you can so that we understand that, okay, this is an approximate answer. You might not remember exactly. That's okay. That's fine. If you don't know or you don't remember -- perfectly good answer as long as it's the truth.

Everything today is going to be a question-and-answer format, so I'll as questions and you answer. Same will go for any of the other attorneys. If you have any questions, you need to direct that towards the attorney questioning you. You can't rely or seek assistance from your attorney.

I and the other attorneys here are entitled to answers to our questions. Now, you may hear objections from your attorney. What she's doing is preserving objections for the record. We're not in trial right now. So I'm sure you've seen on TV where people are in trial and the attorney will ask a question. There's an objection and they argue in front of the judge.

We don't have a judge here today, so we're not going to do that arguing just yet. What you'll most likely hear is your attorney say something like "object to form." Again, just preserving the record. Go ahead and answer the questions unless your attorney tells you not to answer it.

As I said, if you have any questions, please ask me. If you need me to restate or repeat a question, I'm happy to do it. Generally there's an assumption that if I ask a question and you answer it then you understood my question.

Does that sound fair?

A Yes.

Q Okay. If you need to take a break for any reason, we can do that. Just let me know. I may want to finish a particular line of questioning, but we can take breaks whenever. It's not a huge deal.

Is there any reason why you wouldn't be able to understand my questions or give truthful answers today?
A No.
Q Okay. You're not under the influence of any drugs or alcohol?
A No.
Q No medications?
A No.
Q Okay. Can you state your full name for the record?
A Allison Renee Dunavant.
Q Okay. What is your date of birth?
A June 9, 1994.
Q Okay. Where did you go to high school?
A Myrtle Beach High School and the Scholars Academy.
Q Okay. What year did you graduate?
A 2012.
Q Where did you go to college?
A I went to Coastal Carolina for undergrad.
Q Went there the whole time?
A My first semester I went to Florida Gulf Coast University in Fort Myers, Florida, and then I transferred back.
Q Okay. And what degree did you get from Coastal?
A I got my BA in studio art and art history.

Q Okay. When did you get that?
A I graduated December 2014.
Q Okay. And then after Coastal, you went to University of South Carolina; correct?
A The following fall, yes.
Q Okay. Have you had any other schooling after you went to USC?
A No.
Q Okay. Have you applied to any other programs?
A I applied to a fellowship at Clemson.
Q When was that?
A This past fall I applied.
Q What type of fellowship is that?
A It was a study art based fellowship.
Q Okay. So were you accepted to that?
A No.
Q Okay. Are you currently employed?
A Yes.
Q Okay. Where do you work?
A South State Bank.
Q And what do you do there?
A I'm a teller.
Q How long have you been working there?
A Since November.
Q That would be November 2018?

A Yes, sir.
Q Okay. And where is that exactly?
A It's in Charleston. On James Island.
Q Where did you work before that?
A The last place I was employed was USC.
Q Okay. And what did you do there?
A I was the graduate program assistant over at the Center for Teaching Excellence under Dr. Michelle Hardee.
Q Was that a part of the master's in fine arts program?
A No. That was a position I found myself and maintained after I graduated.
Q Okay. So when did you start that particular position?
A The fall of 2017.
Q And when did you leave that position?
A The end of July 2018.
Q And you got your master's in fine arts -- was that spring of 2018?
A Yes.
Q Okay. So there would have been some overlap there. Did you work as a graduate assistant for the University of South Carolina?
A Yes.

Q Is that -- how does that work with the master's of fine arts program? Are they related, or is that something optional you did for some extra money?
A Are you speaking about my assistantship with the Center for Teaching Excellence? That position?
Q Okay. Let's talk about that one specifically first. Yeah, that one.
A Okay. Yeah. That was originally an assistantship position, but they turned it into a part-time job after I graduated.
Q Okay. How many hours a week roughly was that?
A During the school year, it was 10 to 15. And then when I graduated, it was up to 30.
Q Okay. And then prior to that, you worked as a graduate assistant?
A Yes.
Q With which school? How did that work?
A The School of Visual Arts and Design.
Q Okay. So you were not a graduate assistant with the School of Visual Arts and Design from fall 2017 forward; correct?
A I was. I was an instructor of record for drawing for Visual Arts and Design. The other position was separate.
Q You did both?

A Yes.
Q Okay. Thank you.
A Because I only had the one assistantship through the School of Visual Arts and Design where most people had two. So I found a second one for myself.
Q Understood. Prior to working as a graduate assistant for USC, did you have any employment prior to that?
A I was the manager of a Hollister.
Q Where was that?
A In Houston, Texas.
Q When did you work there?
A In between graduating undergrad in December 2014 and going to grad school in August 2015.
Q And what brought you to Houston, Texas?
A I had friends there, and I also had applied to grad school there as well. So in between kind of waiting to hear back, I went down there and was just hanging out and enjoying a different place.
Q Okay. Have you been involved in any lawsuit besides this one as a plaintiff or a defendant?
A No.
Q And this is a question I ask everyone I ever depose. So please don't get offended by it. Have

you ever been arrested for any crime?
A No.
Q And if this case were to go to trial, we would have to pick a jury. So I'm going to ask some questions about relatives and your associations. I'm not trying to get involved in your personal life. I just -- when we pick a jury, we want people that are completely disinterested. So I don't want your relatives on a jury just like you're not going to want my relatives on a jury.
A Uh-huh.
Q Does that make sense?
A Yes.
Q Okay. So you're from Horry County; correct?
A Yes.
Q Do you have any family outside -- in South Carolina outside of Horry County?
A No.
Q Okay. You lived in Columbia for a period of time; correct?
A For three years, yes.
Q Okay. While you were here, did you attend any churches or anything like that?
A No.
Q Okay. Are you a member of any civic organizations?

A No.

(Defendants' Exhibit No. 1 marked for identification.)

Q (MR. GESSNER) All right. Ms. Dunavant, I'm showing you what's been marked as Defendants' Exhibit 1.

Have you ever seen that document before?

A Yes.

Q What is that?

A It is the complaint -- the amended version of the complaint.

Q Okay. And prior to today, have you ever read that document?

A Yes.

Q Okay. Is it fair to say that everything in there is true and correct to the best of your knowledge?

A Yes.

Q Okay. Now, I understand this lawsuit centers around a trip you took to Italy in the summer of 2016 and your interactions with a professor David Voros; is that correct?

A Yes.

Q Okay. Prior to the trip to Italy, what was your experience with David Voros?

A I took his painting class and then his life drawing class.

Q Do you remember when those classes were?
A One was in the fall of 2015, and the other was spring of 2016. I don't remember the specific times that I took the class.
Q That's fair enough. How did you characterize your interactions with David Voros prior to the Italy trip?
A What do you mean specifically?
Q Was it a normal professor-student relationship?
A Yes.
Q Did you have any issues with him as a professor at all?
A Not any issues different that other students.
Q Okay. What does that mean?
A It means many students had issues with his tardiness, his kind of lack of regard for the courses, his inability to show up for meetings. That kind of thing.

I'm aware that there were several other, you know, issues with that and reported type things with that -- emails to the department regarding that.

Q Okay.
A But outside of that, no.
Q Okay. Nothing specific to you as an individual?

A Besides missing meetings or having some frustrating moments in class, no.
Q Okay.
A Just a normal relationship.
Q So the fall of 2015 was your first semester at USC; correct?
A Correct.
Q Okay. So for that academic year, did you have any issues with any other professors?
A No.
Q So going into summer of 2016 and this -- and the Italy trip, how did you first hear about the opportunity to go to Italy?
A I heard about the opportunity through David Voros. Originally, I tried, with his help, to apply for scholarships, and I think he recommended me for a fellowship or a scholarship to get funding to go to the USC in Italy program which didn't work out. And I inquired through the department about other opportunities to get funding to go because he believed it would better my artwork; and as a painting student, he was my direct adviser in college.
And so when that kind of fell through and I wasn't able to get funding, he offered the trip

through the USC in Italy program, or I could come earlier than the program with some other students.
Q Before the USC in Italy group; correct?
A Yes.
Q Okay. And as originally envisioned, were you supposed to stay as part of the USC in Italy group?
A No.
Q Okay. So you were going to leave before the sort of official trip started; correct?
A Yeah. Because he said there wasn't enough space.
Q Okay. So at that point, right before you left for Italy, what was your understanding of the arrangement?
A My understanding, since we had originally tried to get class credit for it, was that it was a school trip because it was recruited -- like, we were recruited for the trip on campus through USC email, through campus class time. The department was also aware of the trip. So my understanding was that it was a school, you know, function, even though I wasn't getting actual class credit, that it was still within the realm.
Q And you said you tried to get credit. Who did you talk to about getting credit for your time in Italy?

A I spoke with David, and then I spoke with Dr. Graciano and Chametzky as well about trying to make an independent study class so I would get credit for my time over there.
Q Okay. Did you fill out any paperwork related to that?
A No.
Q But by the time you left for Italy, you understood that you weren't getting any credit for your time there; correct?
A Yes.
Q Okay. Do you recall what day you arrived in Italy?
A May 4.
Q Where exactly in Italy were you?
A We were in Monte Castello for most of the trip.
Q Okay. When you arrived in Monte Castello, what was your first impression?
A That it was not what I intended on the trip. It was not what I had been told or the impression that I had been given of what the trip would be.
Q Okay. What specifically was not what you expected?
A The town was really cute and, you know, kind of what I expected from like an authentic Italian town. But the ICA, the school building, was not at all what I had envisioned. The conditions were not

what was described to me in any way, shape, or form.

Q But Monte Castello is kind of a medieval village, isn't it?

A Yes.

Q Could you describe the ICA facilities that you're talking about?

A The building itself that we stayed in and did most of our work in looked like it had been, you know, uninhabited for quite some time. It was quite cold and dirty. There wasn't any, like, linens, towels. There was lots of bugs, spiders, specifically in the bathroom. I remember there being spiders.

There was cat urine, like, where cats had gotten in. There's a lot of stray cats in that village, and they had clearly gotten into the school building and sprayed on a lot of the, you know, mattresses and couches and remaining furniture that was in there.

Q You stated that you didn't expect to see any of that; is that correct?

A That is correct.

Q Okay. Prior to leaving, were you told by anyone to bring your own linens and towels?

A Yes. We were told to bring a sleeping bag. But

none of us were actually aware of the conditions and what we would be needing the sleeping bag for. We assumed that we would need, you know, blankets and that type of thing because the school program wasn't there yet. But we didn't expect to be, you know, sleeping in an uninhabited building that was -- you know, no heat and air.

Q Okay. Did you bring a sleeping bag?

A I brought several blankets. I didn't own a sleeping bag.

Q Okay. So you said it was cold. How cold was it? And this is again one of those opportunities for an approximate answer.

A Yeah. I'm not sure exactly what the temperature was as it was three years, over three years ago. But it was cold enough to where I slept with, like, pajamas, sweatpants over the pajamas, socks, and several blankets inside a building.

Q Now, you said there were spiders in the facility.

A Yes.

Q How many would you estimate were there when you first walked in?

A I didn't count the spiders. But there was at least, like, three or four in each room. We were, you know, dusting them out of windowsills. They

were in the bathrooms. There was a couple in the shower one day. Enough to be alarmed and to notice it out of the realm of the ordinary amount of spiders you'd expect in an indoor facility.

Q Okay. Now, prior to arriving at Monte Castello, was it your understanding that the building had been uninhabited for at least some period of time?

A Uninhabited would be the wrong word that I would use.

Q What word would you use?

A I would say that I would expect that a group wasn't immediately in the building, but I wouldn't expect that it had been, like, uninhabited since the prior summer to the point of, you know, the kind of disgusting, gross, like, sterile cold type environment that it was.

Q Did you tell anyone at that time that you had concerns with the living arrangements in Monte Castello?

A I talked to Cody Unkart, the other grad student that was there; and then Antonio Griffin, who was the undergrad student that was there.

Q Okay. So y'all were kind of talking about it; right?

A Yes.

Q And what did they say about it?
A They kind of agreed and shared similar concerns.
Q Okay. So it's you, Cody, and Antonio and David Voros; correct?
A Correct.
Q Was anyone there when you arrived?
A I don't specifically recall anyone else being there. Well, I guess there was Eros Tassi. He wasn't in the building when we got there. But we met him later.
Q Okay. But he didn't stay in that facility; correct?
A No. No, absolutely not.
Q Do you know where he lived?
A No.
Q But he's Italian? He lives in that area?
A I would assume so.
Q Did you raise any concerns to Professor Voros about the living arrangements?
A I believe I said a few times that it was cold and kind of expressed that that wasn't, you know, opportune sleeping arrangements. But other than that, initially, I was kind of just complacent with it.
Q Okay. When you complained about it being cold, did

Professor Voros say or do anything in response?
A He suggested a few times if it got too cold that we could sleep at his personal home.
Q Okay. Did he give you any additional blankets or anything like that?
A Not that I recall. I don't know if he maybe gave some to some of the other students.
Q All right. What were you doing in the ICA facilities at that time?
A We were supposed to be just setting up for the USC in Italy program that was coming.
Q Okay. You "were supposed to be setting up" is what you said.
A Yes.
Q What were you actually doing?
A We were doing a lot of manual labor that I don't think falls under the category of simply setting up or what was described to us prior to going on the trip.
Q Okay. Give me some examples of what you thought would be "setting up."
A I was told we would do some light cleaning; getting, you know, bed linens and stuff ready; maybe setting up the art studios; making sure they were arranged properly or materials were ready to

go. That type of thing. Kind of stuff that fell under the category of what we would do normally at the university within our assistantship roles.

Q Okay. And so you were told that specifically in those words?

A Yes.

Q Who told you that?

A David Voros.

Q Okay. Was that verbally, or was that over email or text or anything else?

A Verbally and over email as well that we would be setting up. It was -- his emails were often very ambiguous.

Q Okay. When he told you verbally what y'all would be doing in Italy, was anyone else present for that conversation?

A Yes. Cody Unkart and Antonio Griffin.

Q Okay. You said you were actually doing manual labor. What exactly were you doing?

A We painted a room that was in the basement, an entire room. We painted it white and then scrubbed paint off some of the stones in that room. We swept all the floors in there, and I don't just mean normal light, you know, how you sweep your kitchen. I mean, like, getting, like, piles of,

like, debris; and there was cat poop everywhere and, you know, cat spray. And we took the cushions off of the couch and tried to clean the cat spray off of the cushions.

Antonio and Cody moved a lot of furniture. I kind of refrained from doing that because I didn't think that it was safe for me to be, you know, moving furniture at my size up and down stairs, that I didn't feel, you know, that would be a safe move for me. We also scrubbed clay off these boards downstairs. Mostly we spent a lot of time painting. We even painted the ceiling downstairs in the basement. We spent a lot of time, hours, doing that.

Q About how many hours a day would you work?

A Usually we would get up and have breakfast and then we'd work all the way until, like, a lunch break. And then we'd work again until dinner which was later in the evening. So I'd probably say at least -- at least -- eight or nine. And that's just an approximation. It kind of fluctuated depending on, you know, what David had planned for the day.

Q Okay. Other than working, what you describe as manual labor, did you do anything else in Italy?

A We'd go on a few trips. Whenever he had to run errands, he would take us with him so we'd only be there for the duration of the errand that he had to complete. So we did that. We didn't do much art making while I was there which was kind of my, you know, intended idea with the trip or what I was, you know, planning on doing when I was there -- what was communicated to me as the purpose of the trip, which was for art.

Whenever we would go on a few of these trips while he was doing his errands, we did go in, you know, a museum or a church if we had time.

Q So these trips -- I'll call them mini trips -- how many of those do you think you went on while you were in Italy?

A Maybe one or two. Like I said, they were when he had errands.

Q Do you remember where you went?

A I believe we went to Perugia at one point, and then we had -- I don't remember if it was Assisi maybe was the second place that we went.

Q You were talking about "art making." Was that -- there's an art studio there; correct?

A Correct. There was a separate building for art studios.

Q Okay. So what buildings were there exactly?
A Do you mean related to the ICA?
Q Yes.
A There was the building that was for, like, sleeping and, you know, where they'd have their meals if you were in the USC in Italy program. And then there was a separate building that had studio spaces.
Q Okay. And then Professor Voros has a home or had a home in Italy; correct?
A Correct.
Q Okay. How much time did you spend in the studios making art?
A None.
Q Why not?
A We never had time outside of the cleaning and, you know, different manual labor tasks that we were doing.
Q At what point did you take a trip to Rome?
A I believe around the 14th or 15th. So after I had been there for over a week.
Q Okay. And that was after you went to Perugia and Assisi; correct?
A Correct.
Q Okay. What was -- what was supposed to happen with the Rome trip?

A We originally were supposed to go as a group, and then David had other errands that he wanted to do. So it ended up being, you know, just a trip with me, Cody, and Antonio. He gave us some kind of ambiguous loose instructions as to how to, you know, kind of travel around the area and then made it clear that we needed to get back to the train station the following day by 6:00 p.m.

Q Do you speak Italian?

A No.

Q Do you speak any other languages other than English?

A A little bit of French, and that's it.

Q Do you know if Cody or Antonio speak any language besides English?

A No. They don't speak Italian.

Q So you go to Rome, and you stayed overnight; is that correct?

A Yes.

Q Okay. Where did you spend the night?

A In Rome. Like, the middle of Rome kind of near the train station. We stayed at a hotel.

Q Okay. Who paid for that hotel?

A I don't remember.

Q So it was intended to be kind of like an overnight

stay in Rome and then make your way back to ICA; correct?
A Yes.
Q Okay. And your instructions were to get back to the train station by 6:00 p.m.; correct?
A Correct.
Q Which train station?
A The main train station in Rome. I believe there's just the one.
Q Did you make it there by 6:00 p.m.?
A We did.
Q It wasn't 6:30 when you got there?
A No.
Q Did you ever tell anybody that you didn't get to the train station until 6:30?
A No.
Q So what happened when you got to the train station?
A We were told that we still missed the train that was going to where we needed to be, so we had to wait a little longer.
Q Okay.
A To get on the same train.
Q So there was another train. You just had to wait a little while?
A I believe it was the train that we were originally

supposed to be on. There was just some kind of miscommunication in the instructions that we were given.

Q And that's a miscommunication with Professor Voros' instructions?

A Yes.

Q How so?

A Because he told us to be there by 6:00 p.m. And we were there by 6:00 p.m., and there wasn't the train we needed to be on.

Q Okay. Do you recall about roughly what time the train left?

A No, I don't recall specifically at this time.

Q Well, was it like an hour later? Was it the next morning? How --

A No. I don't believe it was any more than an hour later.

Q Okay. So where did that train take you?

A We ended up stopping in Terni because having, you know -- that train being a little bit later, it kind of through off the times for the other connecting, you know, trains that we had to get on.

Q Right. Gotcha. So it's fair to say then that you missed a connecting train. You weren't able to make it back to ICA; correct?

A No. We got stuck in Terni.
Q Okay. So just so I'm clear, what was the original plan? You would take the train to Terni and catch a connecting train or bus?
A A train is what we were told.
Q Okay. Where was that train supposed to take you?
A To Fratta Todina, the closest train station I believe at the bottom of the hill of Monte Castello.
Q Okay.
A And he was supposed to pick us up from there.
Q Okay. So what happened when you got stuck in Terni? What did you do?
A Well, we tried contacting David, and he wasn't really happy with us and kind of got irritated that we didn't follow his instructions or the perceived instructions, that there was the miscommunication there. And he said that, you know, we were -- had to stay there because he wasn't going to come get us.

He told us that it was two and a half hours from Monte Castello, which it was not, but he basically told us that we needed to kind of figure out -- you know, that our lack of following directions and being disobedient was not his

concern.
Q Okay. So at this time how old were you?
A 21.
Q You had a cell phone with you; correct?
A Correct.
Q What kind of phone was it?
A I believe it was a Samsung Galaxy.
Q Okay. Was it working okay while you were in Italy?
A As good as a phone works in, you know, another country. I didn't have great service, but I could get Wi-Fi where there was Wi-Fi.
Q Okay. So cell phones work in the United States, but they don't work so great --
A Well, they don't for, like, calling. My phone -- I couldn't, you know, call very well to other people in Italy or back home. It was hard to call as well.
Q Okay. Before you left for Italy, did you talk with your cell phone carrier about international calling, or did you check to see if your phone would work overseas?
A They said it would work, but that there would be, you know, fees attached with it and that the reception could be poor, which it was.
Q How much money did you have on you?

A I don't recall at this time.
Q Could you give an approximation?
A I really don't know.
Q Okay.
A I had my debit card, and then I had some euros for spending money.
Q Okay. Can you give me an approximation of how much money would have been in your account that you could access with your debit card?
A A few thousand dollars.
Q Okay. You could use your debit card in Italy; correct?
A Correct.
Q And there were ATMs; correct?
A Correct.
Q So you were basically told to figure it out. What did y'all do while you were stuck in Terni?
A We got food because we were hungry, and we needed to eat before we kind of tried to figure out like a game plan of what to do.

So we got some food, and then we kind of just hung out in the train station or transit station whatever it was because we didn't want to go too far in case -- you know, we didn't speak Italian. So we wanted to make sure if a train or something

was coming in that we were able to see where it was going.

So we kind of hung out there for a while. And the guys -- they wanted to stay at the train station. Like, they wanted to spend the night there and just sleep on the floor in the train station.

Q Okay. I take it you did not want to do that?

A No. I didn't feel like that was a safe option.

Q Okay. Did you get along with Cody and Antonio okay?

A Yeah.

Q Okay. So y'all didn't spend the night in the train station; right?

A No. We ended up getting a hotel when we realized we didn't have a way out of Terni.

Q Okay. Did you try to talk to anybody at the train station?

A We talked to the person that worked there as best we could because they didn't speak English.

Q Okay. Were you able to learn anything about the train schedule or anything like that from that person?

A As best we could. We tried to figure out when the train to Fratta Todina was going to be there.

Q Okay.
A And our understanding was that it would be the next morning.
Q Okay. So at that point --
A Hence our, you know, staying overnight.
Q Gotcha. Do you remember who paid for that hotel room?
A I believe we all paid for it. Like, one of us paid I think on our card, and then the others gave us euros, you know, to kind of split it.
Q Okay. So what happened the next morning?
A The next morning we had to still wait for the train. And, again, we had a lot of issues trying to navigate and figure out where we were supposed to be because Terni is a very, like, Italian town. It's not like Rome, which is more, you know, commercialized and tourist based so people speak English there.

We were very, like, confused and trying to figure out where to go. We tried to contact David. I contacted him and Eros trying to figure out, you know -- and I contacted them the night before as well, trying to figure out what we could do to get out of there or what the best option would be.

So just kind of hung out there, again, in the

train station all day trying to wait for and figure out, you know, which train we were supposed to be on. And eventually somebody was, like, you know, "this one," like pointed and kind of was like, "You need to get on this one," type thing.

Q Okay. So you got on a train.

A Yes.

Q Do you remember roughly what time it was?

A I believe at that point it was sometime in the early afternoon.

Q Okay. Where did that train take you?

A To Fratta Todina.

Q What happened when you got to Fratta Todina?

A We tried to contact David again, which, again, didn't really get us very far. And we weren't able to contact him at all. Like, he didn't answer his phone. We couldn't, you know, message him. No email responses or anything like that.

And so we kind of hung out at the train station which isn't really a train station. It's kind of just like a -- I don't know. Like a building with, like, walls and empty doors. Like an abandoned little stop type thing. No bathrooms or anything. Just kind of sitting there.

And so we hung out there for a few minutes

kind of like maybe we should wait and see if, you know, he comes and picks us up here, like was the original plan. We don't hear from him, and it's been like 30 minutes towards an hour at that point. So we decided we were going to walk.

Q Now, the original plan was for Professor Voros to pick you up at that location the day before; correct?

A Yes.

Q Okay. So you get there. You try to contact Professor Voros. Can't get through to him and eventually decide to walk?

A Yes.

Q Okay. How far of a walk is it to the ICA building?

A I believe it's about an hour or over an hour depending on how briskly you walk.

Q All right. And did you walk all the way back to ICA?

A No. We only made it halfway.

Q And what happened at that point?

A At that point David and Alex came down from Monte Castello and picked us up. Well, they didn't pick me up.

Q Okay. How did they know where you were?

A They, I guess, called Cody back, I believe. He was

the one that ended up talking to David on the phone.

Q Okay. So had y'all given up on walking? Did you stop, or were y'all still walking at that point?

A We were still walking.

Q Okay.

A Because we didn't really know what the situation was.

Q Okay. So Professor Voros and Alex you said; right?

A Yes.

Q That's Alex Stasko?

A Yes.

Q Who is she?

A She's a former grad student, and she graduated, I believe, the spring before I came in, so spring of 2015. I'm not sure what her affiliation was with the ICA or with the university at that point.

Q So what happened when they showed up?

A David was very angry. He would not let us get in his car. So he immediately got out of the car and said that we had to have like a group meeting or group discussion to kind of clear up our, you know, purposes in Italy, like what our relationship was there and what we were intended to be doing. And was kind of like angry.

Q What did he say your purpose was there in Italy?
A He basically just -- following the, you know, emails and discussions that we'd had prior to going to Italy and then following my trying to contact him when we were stuck in Terni, he wanted to basically tell us that we were not there as part of a USC trip, that we were, you know, there -- he was our employer, and we had an employer-employee relationship and that we were there to work. And we were there under, like, his graciousness of allowing us to be there.
Q Did you not agree with that?
A No. I did not agree with that.
Q Okay. Were you not there to help ICA get ready for the USC in Italy trip -- USC in Italy trip in exchange for free lodging and meals?
A Yes. We were there as graduate students to help set up for that, but there was never a contractual employee-employer relationship that outlined a specific hour and time of work, as David later suggested that there was.
Q You said there was no contractual agreement. What makes you think that?
A There was no explicit in writing of "you will work, you know, 9:00 to 5:00," for example, and "you will

be doing this type of labor and this type of labor in exchange for this many meals, this type of lodging," this -- there was none of that. It was a very vague description of, you know, what we were going to be doing when we were over there. His idea of a contractual work employer-employee relationship came later once we were in Italy.

Q Is your issue that there was no written agreement or that your agreement was not as specific as you would have liked?

A My issue --

MS. ALBRECHT: Object to the form. Sorry. Go ahead and answer.

A My issue was that there was no verbal, written -- there was no -- any agreement of "this is what you will get in exchange for, you know, working this many hours." There was none of that. It was a very, like, loose, like, "Hey, guys. Let's go over to Italy. This will help your artwork tremendously. You can help me set up, and I'll give you meals and stuff for helping set up."

It was a very casual, like, not a contracted relationship for working when we went over there.

Q Okay. So you're having what Professor Voros called a group discussion, I believe, and that -- he's

talking to all three of you; correct?
A Yes. He begins by talking to all three of us and yelling at us for being disobedient.
Q Okay. Then what happens?
A And then he kind of specifically targets me with his hostility because I was the one who had contacted him the most when we were stuck in Terni.
Q Okay. How long did this -- let's call it group discussion -- go on? How long was that happening?
A Probably like a good 20 minutes. Maybe 30.
Q Okay. So what happened after that?
A After that, he kept kind of going on about how I specifically, you know, was being, like -- he's like, "All you do is bitch." Like, "You have been deficient in your, you know, working, like what you, you know, kind of signed up to do here in terms of your -- your work production," and that, you know, was not happy with my emails to him.
And then I kind of like looked away because he was yelling, and I'm not used to being yelled at like that by an adult male. So I kind of looked to the side, and he like freaked out about that, that I was not looking at me. He was like, "Look at me when I'm fucking talking to you," and kind of just got more angry and angry and angry. And I was

just, like, really confused at that point, like, where this hostility was coming from.

Q Was this him yelling at you, or were you yelling back and forth at each other?

A Oh, no. I wasn't yelling at all. I was not engaging with it. I was just being quiet and kind of like looking down, you know, trying to make sure I, you know, didn't engage with that because I didn't think it was the correct thing to do.

Q Okay.

A Because, again, he was my professor, and I still kind of respected that boundary.

Q Okay. So what happened after that?

A He continued to get angry, and then at a certain point, told me I could walk my ass back up the hill to Monte Castello myself. So they all got in the car, and I was still standing outside of the car just really confused and panicking about -- like, I had no idea what was going on or where this, like, anger came from. It was very explosive and unexpected.

Q Okay. So they all get back in the car; correct?

A Correct.

Q You're -- were you not allowed in the car, or you refused to get in the car?

A I wasn't allowed in the car at that time.
Q Okay. So were they driving away, or were they just sitting there?
A No. They sat there for a few minutes, and then Alex got out of the car to come talk to me. And she told me that I needed to go to David and to apologize to him. I was like, I'm not sure what I'm apologizing for. I haven't been, you know, disrespectful. I haven't even said anything. I just was kind of looking away.

At that point I was like, you know, like, I don't know what to do. Like, I'm not going to apologize. And she's like, "Well, if you don't apologize, like, there's not really anything I can do." She ended up kind of flagging down another car that I was able to get into. So they drove away separately, and I got into a car with somebody else to drive back up to Monte Castello.

Q Do you know who this person was?
A No idea.
Q Okay. Does Alex speak Italian?
A No. I mean, she may speak a little. I don't know. I don't think she's fluent.
Q But you're not sure who this person was or how she was able to convince them --

A No.
Q -- of driving back?
A I think she may have been familiar with them, you know, being a person within the town.
Q So you get a ride back to ICA. What happens when you get there?
A They tell me that I'm not allowed to go into the school building. Alex comes back and, you know, comes to talk to me. I tried to go find a hotel to see if there was somewhere else I could stay because I was pretty concerned at this point, like, what was going to happen.

Alex comes up to me and tells me that, you know, if David doesn't want me in the school building then I can't be there because it's his property and he could have the police come remove me.

Q Okay. You said "they" told you, you were not allowed back in. Who specifically said that?
A David and Alex.
Q David Voros told you that directly?
A Uh-huh.

MS. ALBRECHT: Is that a yes?

THE DEPONENT: Yes. Sorry.

MS. ALBRECHT: You're doing good so far.

THE DEPONENT: That was my first "uh-huh."

MR. GESSNER: And I forget to remind people about half the time.

Q (MR. GESSNER) All right. So you're told you're not allowed back in. I'm sorry. You said you went to the hotel and tried to get a room; correct?

A Correct.

Q And what happened when you got there?

A They told me that they didn't have any vacancy.

Q Okay. So what did you do after that?

A I kind of just hung out outside of, like, near where the school building was. I was on the phone with my parents trying to figure out what to do.

Q Okay. How far is the hotel from the ICA buildings?

A Not far. Walking distance. I don't know specifically.

Q Are you eventually allowed back in the ICA buildings?

A Yes.

Q Who told you, you were -- you could come back in?

A I believe Alex told me. I don't, you know, recall specifically. But I do remember that I was allowed to go back in the building -- I believe it was Alex -- that I could go back in, and so I ended up back in the school building.

And David came to talk to me at a certain point about my, I guess, behavior and, you know, what we would do going forward. And I was told that I had to stay in the room, you know, and I wasn't allowed to have meals with the rest of the group. At which point I was kind of just like, you know, I just want to, like, work -- continue to work until, you know, the end of my trip. Like, I didn't want to cause any further issues.

Q Okay. So it's your testimony that Professor Voros told you, you had to stay in your room; correct?

A Yes.

Q Okay. And you say that you offered to go back to the way it was. You were going to work and go back to the meals and everything; right?

A Yeah.

Q Okay. And what did Professor Voros say in response to that?

A He said no, that he didn't think that it would -- that my behavior would allow that to happen.

Q Okay.

A At which point I was still confused what exactly that meant about "my behavior."

Q Okay. Were you told by Professor Voros or anyone -- anyone else that you were free to go?

You could go stay in a hotel or go home or do whatever you wanted?

A I was told that I could go stay in a hotel. Alex told me that as well. But, again, there was one hotel in that area, and they said that they were booked. So that wasn't really an option.

Getting back to, like, Rome or somewhere where, you know, English was spoken, that I could easily navigate to, was also not really an option because that would have consisted of me walking an hour back down the hill to the Fratta Todina, you know, train stop or whatever and trying to figure out without speaking any Italian where to go, which seemed like an impossible task, not speaking the language to try and navigate that. You know, if I was in Rome, it would have been a different story.

Q This is 2016, and you're in Italy. Are there any taxis available to you at that time?

A I have no idea.

Q Was that something you looked into? Did you look to see if that was available?

A I don't know where I would have looked for that.

Q Okay.

A I did walk around the village some and tried to, you know -- like, I talked to a woman that was

there that spoke a little bit of English and tried to kind of explain the situation. And I didn't really get anywhere. Again, not speaking the language is a huge barrier in trying to travel or find anything.

Q Okay. I'm trying to remember back. Was Uber available in 2016, or did you -- is that something you looked into?

A I didn't even know if Uber was a thing in Italy. I'm not sure. And don't really have, you know, great cell service over there for that kind of thing. Like, you can make long-distance calls, but, you know, there's no, like -- my 4G or whatever it is doesn't work over there.

Q Okay. At what point did you contact -- or did anyone contact on your behalf the University of South Carolina?

A I believe when -- at some point in between me being left on the side of the road, I had called my mom and my dad because I was like panicking. I was like, "I don't know what I'm supposed to do," and so that was my first instinct was to call them.

And I called her again when I got up to the top of, you know, Monte Castello when I got there from that guy driving me up there and was still,

like, panicking. I was like, "I don't even know what's happening." But I believe at some point during that time she was able to contact USC.

Q Okay. Did anyone from USC contact you?

A Yes.

Q Who did you speak with?

A I spoke with Magdalena. I don't know what her last name is. It's something foreign. I spoke with her, and she works directly with, I believe, Allen Miller. And then I spoke with him as well.

Q Okay. Did you speak with each of them on the phone?

A No.

Q Okay.

A I spoke with Magdalena over Facebook Messenger because, like I said, I didn't have very good cell service. So it was really hard for me to get calls. I did end up speaking with Allen Miller over the phone, but it took a few tries calling him.

(Defendants' Exhibit No. 2 marked for identification.)

Q (MR. GESSNER) Let me show you what's been marked as Defendants' Exhibit 2. I will represent to you that in the course of discovery, your attorney has given us a data file or files that contains your

Facebook account --
A That's correct.
Q -- at least for 2016, and I think even after that. To the best of my knowledge, this is your Facebook Messenger conversation with Magdalena Grudzinski-Hall; is that correct?
A That's correct.
Q Okay. So you either transferred the file to your attorney or gave her access; is that correct?
A Yes.
Q Okay. So what your attorney has given me is a true and accurate representation of your Facebook messaging with Magdalena in May 2016; correct?
A Correct.
Q Okay. So is this the Facebook messaging?
A Yes, this is the Facebook messaging.
Q Okay. That we were talking about. All right. So what did you tell Magdalena about your situation in Italy?
A It would appear, based on this document, that I told her kind of the conditions and, you know, what went on with -- after being left on the side of the road situation and, you know, kind of my fears for staying there further.
Q Okay.

A And the conversation that was transpiring between David and I. And I made sure that I kind of summarized, you know, the phone calls from Allen Miller. Allen Miller kept trying to get me to say that I felt safe, and he kept overtalking me on our phone call.

And I was, you know, would message her so that it was writing that this is not what I said. This is not how I feel. You know, and I clearly described to her the situation of getting stuck at the train station.

Q Okay.

A And not being picked up.

Q Okay. Now, you spoke with Allen Miller on the telephone. And I don't think you messaged him on Facebook, did you?

A No.

Q Did you email with Dr. Miller?

A I don't believe I emailed with him while I was in Italy. I know that he was, like, cc'd on some emails after I got back from Italy. I don't remember if I specifically spoke with him via email.

I know I talked to him on the phone while I was there. But, again, I was, like, panicked and

stressed out at this time trying to figure out, like, what I could do. So it's possible, but I don't specifically recall emailing him, which is why I put it in writing to her, like, "Hey, this is what's going on."

Q Understood. Did Allen Miller ask you if you were safe?

A Yes. Several times. To which I replied no.

Q Was that your response?

A Yes.

Q Did you tell him that by -- it would depend on how you define "safety"?

A That's what I said.

Q Okay. Did you tell him that by technical definition you were safe but that you did not in the slightest feel safe and feel like the environment you were in was one you could not trust?

A Yes, that's what I said.

Q Okay. So you didn't feel safe, but you did not ever say that you, in fact, were in danger; correct?

A I think in this particular message I was -- you know, what I recorded here -- was me being sarcastic in terms of saying, "It depends how you

define safe." That was me, you know, having some sarcasm with that and being stressed with my situation in saying that.

But I clearly go on to say that I do not feel safe and this is an environment I can't trust, which in my opinion is the definition of not being safe or feeling safe. I think it's pretty evident that the way I said that was sarcastic.

Q Okay. So you're in Italy, and at that point you want to come home; correct?

A Correct.

Q Okay. Had you tried to change your -- because you still -- you plane ride home wasn't for about another week; correct?

A Yeah.

Q Did you try to change --

A I looked into changing that, and I wasn't able to afford to do that. And I didn't know how to get to the airport or anything like that.

I also -- again, I had mentioned to David that I could stay and continue working and just peacefully kind of finish out my time there. No issues. Like, I wouldn't even say anything. Just kind of do my own thing. Just work and eat my food and go to sleep until my flight was out.

And he said that that was not an option. So I did try to be, you know, kind of compliant with what I was originally, I guess, in his mind, there for just so that there wouldn't be any further issues. But that wasn't an option either.

Q Okay. Where were you when Professor Voros told you that?

A Told me what specifically?

Q That working for ICA and continuing as you had been doing was no longer an option.

A I was in the ICA building.

Q Okay. You recorded that conversation, did you not?

A I believe that is one of the conversations I recorded. But it was told to me a couple of times.

I didn't record all of the conversations. I only recorded the conversations when I began to feel extremely unsafe, after my phone calls with Allen Miller when he kept trying to tell me over and over again that, "Oh, you're safe," like, "You're safe. You're safe." And I'm like, "No. That's not what I'm saying."

And at that point I was getting kind of alarmed when David and Alex were also talking about, like, you know, this is his property. He can have the police come and get me off of the

property. And he was trying to contact a lawyer or something in Italy. That's the point where I really started, like, panicking and began to, you know, record the conversations just so there would be some kind of traceable thing going on.

Q Did Professor Voros know that you were recording him?

A No.

Q Who else did you record while you were in Italy?

A I didn't -- I don't believe I recorded anyone else. I do know -- well, I found out later on -- I was on the phone with my mother when Alex came to speak with me in my room, and I just left the phone call going. So, like, if something transpired, like, somebody else would know what was going on. And I believe she recorded --

Q Okay.

A -- what she could hear via the conversation.

Q So I'll represent to you that your attorney has given me a recording of a conversation between you and Alex Stasko. But if I understand correctly, it was your mother that would have recorded that?

A Yes. It wasn't me.

Q Okay.

A And I didn't find out until later that she had

recorded it.
Q Okay. So Alex wouldn't have known that the conversation was being recorded; correct?
A No.
Q Did Alex know that you had left the phone call -- or the phone line with your mother open?
A No.
Q Okay. So you're in Italy in the ICA building. And as you've just stated, you did not feel safe.
Did you call the local police?
A No.
Q And why not?
A Because I didn't think that that would do anything.
Q Why would calling the police not do anything?
A Because I didn't believe that there was an issue that the local police would resolve. Because I thought that, you know, if David was threatening calling an attorney and having me removed because it was his property, so it didn't really seem like a good idea to call the same police that he was threatening to call when it is, in fact, his property.
I didn't think that would be any kind of benefit to me.
Q Now, you had said earlier that there was no vacancy

at the hotel; correct?
A Correct.
Q And to the best of your knowledge, that's the only hotel in Monte Castello; correct?
A Correct.
Q Okay. Did Professor Voros contact the hotel and get a room for you?
A He did after USC got involved and asked him to make accommodations. And then suddenly there was this magical vacancy.
Q Why do you say it like that?
A Because there was no vacancy when I went there. They told me no, that they had no rooms available.
Q Is that suspicious to you?
A Yes.
Q Why?
A Because I think it's strange that when I go there and ask for a room and I have money to pay for the room that they told me no. And then when he calls, there's, you know, suddenly an availability there. I do think that's strange.
Q Okay. Have you ever worked in the hotel industry?
A No.
Q Okay. So you don't know if hotels keep a spare room for emergencies?

A No.
Q Okay. So Professor Voros comes to your room. He tells you that you can go stay in the hotel and this room is available for you; correct?
A I'm not quite certain if that was the time, like, when he came up to my room to tell me that. But I do remember at one point I went down to his office to speak with him, but I can't quite recall at this time --
Q Okay.
A -- at which point that conversation transpired.
Q Fair enough.
A I do know somebody from USC -- I don't know if it was Magdalena or Allen Miller -- contacted me and said that they were going to arrange for me to fly out and that they would get me a hotel for the evening so I could have a meal and everything and then fly out the next day. And I believe that David arranged for me to be driven to the airport.
Q Okay. But before all that happened, did Professor Voros tell you that you didn't have to work for him, that you could stay in the room until your flight, and you could take your meals at the hotel or wherever else in the village, but you could stay in that room and kind of come and go as you

pleased.

Did he tell you that?

A Yes.

Q Okay. Did you do that?

A I tried to find meals other places in the village, but that's not as easy as it's made to sound because a lot of the stores that are there are just little teeny stores that don't offer full meals and they're not open regular hours like you would go to a place here and, you know, grab some food, like, open normal hours. There it's not the case in the, you know, small village setting, so it's a lot harder to go find a meal than you would think.

Q Okay. What about at the hotel?

A They do have a dinner place there. But, again, there's only certain hours for that, and I did try and go to some of these places to get myself some food and some snacks and stuff.

Q Okay. As best you can recall, when did you come back to the ICA building? I'm just trying to organize this in my head. So after the whole -- the walking halfway up the hill, when did you get back to ICA?

A I mean, I got back to the actual, like, building kind of around the same time that they did. But I

wasn't allowed in, so I kind of just sat outside of it for a while. And then I tried to walk to the hotel.

Q Okay. Would that have been May 16 to the best of your recollection?

A Yeah. Because -- well, yeah. Because I flew out the 17th, I believe, is when USC had finally got my flight and stuff together, and I was able to leave. So it's around that point.

Q Okay. Do you remember what time of day?

A What time of day for what?

Q On the 16th that you got back to the ICA facility.

A No, I don't specifically recall the actual time.

Q Was it afternoon? evening?

A Afternoon I'd guess.

Q Okay. Do you recall when you left the ICA building the next day to come home?

A Whenever I got to the hotel and actually, like, got to eat dinner and stuff the next day. I remember I got up really early. I got up at like 5:00 a.m. to meet the person downstairs that was going to give me a ride to the airport.

Q Okay. When did you go to the hotel?

A I guess on the 16th if I flew out the 17th.

Q Okay. So it would have been the evening of the

16th?
A Yeah.
Q Okay. But was it like six o'clock in the evening? Was it later at night, like 9:00 p.m.?
A It's not that late. It was kind of like later evening, but not quite to, like, 9:00 p.m.
Q Okay. What I'm trying to figure out here -- because I believe part of your lawsuit is that Professor Voros was not feeding you at this time; correct?
A Yeah.
Q And I believe you say you were denied access to food; is that correct?
A The only way that I was getting food was because Cody Unkart was bringing me food to my room.
Q Okay. And what I'm trying to establish is why -- because I've never been to this village so it's difficult for me to understand --
A Yeah.
Q -- but why you wouldn't leave the ICA buildings and go somewhere else and just buy a meal. That's --
A Because there wasn't -- it's not like there was this plethora of places that you could go eat. There was literally the hotel with the restaurant and then a few, like, little -- there was a coffee

shop which didn't have actual food besides, like, you know, chocolate bars and random little, like, pastry-type things -- which I did get, you know, some cookies and some oranges and stuff that I could kind of find around that area because there was a little supermarket thing too.

But, again, these places had very strange hours. You couldn't just go, you know, get breakfast immediately or, like, go get dinner or lunch. It was actually a lot more difficult than I think it would seem, you know, coming from here in the United States where you can just cruise up to anyplace at any hour and kind of find something pretty accessible. It's not like that there.

Q Sure, sure. You had said the hotel would serve dinner; is that correct?

A Correct.

Q Did they serve breakfast or lunch or anything like that?

A I have no idea.

Q Okay. Well, do you know if the meals they would serve for dinner were limited to any specific time of day?

A I believe that they were.

Q Okay.

A But I'm not -- at this time I don't really recall what specific time.

But I did wander around -- you know, like whenever they'd go work and I wasn't allowed to continue working and eating and everything with them, I would leave when they left the building and kind of wander around and try to figure out where I could get a meal and that kind of thing. Like, I didn't just -- I would go out when I could.

Q So when you left ICA and went to the hotel, who paid for that hotel?

A I don't know. And I didn't really care at that point.

Q Okay. But you didn't pay for it?

A No, I didn't pay.

Q And your parents didn't pay for it?

A No.

Q What about -- and you ate at the hotel; correct?

A Yes.

Q Okay. Who paid for that?

A I don't know.

Q It wasn't you and it wasn't your parents?

A No.

Q Okay. What about your transportation to the airport the next day? Who paid for that?

A I don't know. All I know is that USC paid for my flight.
Q Okay. So you fly home -- and, in fact, you fly into Myrtle Beach; is that correct?
A That's correct.
Q Okay. Where was the layover?
A In Atlanta, I believe.
Q Okay. So what happens after you get back to the USC campus?
A I end up getting in contact with the ombudsman, Dale Moore. I didn't go obviously directly back to the USC campus because it was summer, and so I was home. And Dale Moore was actually able to meet with myself and my mother at a golf course that was close to our home.
Q Which golf course?
A Glen Dornoch. I believe he said he had friends there or something is why he chose that location.
Q That's a hard course, by the way.
A I don't know. I don't play golf.
Q I've played there once; and from what I recall, it was a hard course.
Okay. And you said it was Dale Moore; correct?
A (No audible response.)

Q Is that a yes?
A Yes. Sorry.
Q So he comes and meets with you. And who is Dale Moore exactly?
A He's the ombudsman.
Q For USC; correct?
A Yeah. I think he's the ombudsman for graduate students.
Q Okay. What is an ombudsman?
A I think, to my understanding, it's kind of someone who helps students kind of navigate where they need to go to, you know, do different complaint processes or resolve different issues. Kind of the person that, you know, points them in whatever direction they need to be and explains policies and things to them.
Q Okay. Did Mr. Moore do that?
A Not well.
Q Okay. How long did you meet with him?
A I guess it was around an hour. Again, that's just an approximation.
Q Did you record that conversation?
A Yes. With his permission.
Q Okay. And, of course, you provided a copy of that recording to your attorney; correct?

A Correct.
Q Okay. Did you ever talk with a Carl Wells?
A Dale Moore eventually kind of pointed me in the direction of the EOP because he kind of -- there was no -- he talked in circles for a while about, like, which policies existed and kind of which channel I would need to go through as a graduate student to kind of file a complaint.

He showed me a bunch of policies that weren't actually, like, complaint avenues. They were just like, "Here's this policy," but there's no way to act upon that policy. He's the one that suggested I perhaps go through the EOP office. And Carl Wells, to my understanding, at that time was the director of the EOP office. So naturally, I ended up speaking with him.

It was my understanding that that was the only kind of channel for graduate students to kind of file a complaint even though I was aware that this didn't necessarily fit the situation that I was -- you know, wanted to make a complaint and wanted, you know, to get action on. I kind of knew that that wasn't the correct avenue. But there was no other avenues kind of possible.

Q I'm sorry. Did you say -- you said, "I knew that

wasn't the correct avenue." Which avenue were you just referring to?

A The EOP office.

Q Why was the EOP office not the correct avenue?

A Because they deal largely with Title IX, and that didn't necessarily fit.

So what we kind of did was try to make it fit under the basis of gender because there's literally no other way for graduate students to kind of have a formal complaint process within, you know -- everybody gets interviewed, gives statements, that kind of thing, where there's an actual, like, investigation.

There's no other way to do that or a very exhaustive -- with trying to find an appropriate channel to kind of, you know, get this resolved. Which is why I talked to so many people trying to find the correct avenue.

Q I understand. So are you saying that your complaint really did not fit and does not fit under Title IX; correct?

MS. ALBRECHT: Object to the form.

A I mean, it does fit if you go under gender. It can be construed to fit because I was treated differently than my peers who are both male that I

went with on the trip. So in that respect, it does fit.

But what I'm saying is that I believe that if USC had a better avenue for me to complain as a graduate student, I might have pursued that instead.

Q (MR. GESSNER) Okay. What was the basis of your complaint at that point?

A The basis of my complaint was that -- I was trying to -- like the harassment that was in Italy that I felt that I was being subjected to -- that was different than how my peers were being treated there. And just the way that I was treated by my professor in Italy.

Q When you say "harassment," what specifically do you believe was harassment?

A I believe the treatment that -- it was, you know, different from the guys was harassment. Like, that I was being constantly berated about not, you know, working as hard or that I was, you know, left on the side of the road. I consider that harassment. That I was yelled at to that extent and being told that I had to, you know, be left on the side of the road and acted, you know -- I was treated as if I was a behavioral concern and, you know, kind of

threatened with being, like, arrested or pulled off of the property. I consider that harassment.

MR. AYER: Can we take a five-minute break?

(Off the record at 11:20 a.m.)

(Back on the record at 11:52 a.m.)

Q (MR. GESSNER) We're back on the record. And we were talking about your meeting with Dale Moore. I think you said he was the one that directed you to the EOP office; correct?

A Correct.

Q Okay. So did you file a formal complaint with the EOP?

A I did.

Q How did that work?

A What specifically do you mean?

Q Well, did you have to -- how did you file the formal complaint?

A I went and met with Carl Wells and requested to file a formal complaint. And I gave him a formal statement and provided, like, witnesses and people that were on the trip and gave him, you know, the documentation that I had at that point.

(Defendants' Exhibit No. 3 marked for identification.)

Q (MR. GESSNER) Okay. I'll show you what's been marked as Defendants' Exhibit 3.

Is this a copy of a statement you provided to Carl Wells?

A Yes.

Q Okay. And did you type this up, or did he type it up?

A It looks like I typed it up.

Q Okay. And I'll represent to you there are some redactions on this document, and that's due to a law called FERPA. Schools are not allowed to release names of students that aren't involved in the litigation or things like that. So we've redacted the names of some of the other students involved.

Did you give a handwritten statement or handwritten form to the EOP office at any point?

A I don't recall.

Q Okay. Let me show you.

(Defendants' Exhibit No. 4 marked for identification.)

I'll show you what we have marked as Defendants' Exhibit 4. I'll tell you that when I got involved in this case and started looking at everything -- and I've got several thousand pages of documents, and it usually comes to me without any sort of context whatsoever.

So have you ever seen that document before?

A No, I have not.
Q Okay. The first page is a cover letter from the Brittain law firm.
A Uh-huh.
MS. ALBRECHT: Is that a yes?
A Yes.
Q (MR. GESSNER) Okay. And then thereafter, there is a Notice of Harassment/Discrimination Complaint form. It looks like it's from the office of Equal Opportunity Programs; is that correct?
A Yes, that's correct.
Q Okay. Did you fill out this form?
A No. The top part where it says my name -- that's my handwriting. The rest is not.
Q Okay. Do you have any idea who would have filled this out?
A No. I guess possibly Carl Wells, but I don't ...
Q Okay.
A Perhaps during one of our meetings. And I signed the bottom here. But I don't -- I didn't fill this out.
Q Okay. When you -- do you recall signing this document?
A Not specifically.
Q Okay. So you don't know if somebody filled it out

and then you signed it or --
A I believe if -- judging by the handwriting that somebody filled it out, and then I signed it.
Q Okay.
A But I haven't looked at this document in quite some time. So I'm just not familiar with it as much as I am with some of the other stuff.
Q Then I'll tell you what -- we'll go back to Exhibit 3 because I believe you had said that you typed this one up; correct?
A Yes. I'm familiar with this. This is mine.
Q Is it fair to call this your EOP complaint?
A Part of my EOP complaint. I wouldn't say it is the complaint.

But I would say it is part of my statement going, you know, presenting to the EOP what my, you know, experience was in Italy.
Q Okay. So this is part of your statement. If I were to look for any other documents that would comprise your statement, what am I looking for?
A I believe that I sent the EOP office copies of emails --
Q Okay.
A -- between David Voros and I and between me and, you know, some other people that were within the

department.
Q Okay. Anything else I should look out for?
A I'm sure there are other things, but I can't recall specific examples at this time.
Q Fair enough. So in your own words, what are you complaining about?
A The trip to Italy and the treatment of myself in Italy and also kind of how the university handled it when I got back to Italy. I think they grossly mishandled the complaint that I tried to put forth.

I mean, there's not even appropriate avenues within USC for graduate students to complain which is why I went through the EOP like I said before. So I'm, you know, outside of what occurred in Italy and my thinking that that was, you know, wrong and poor treatment of myself between a professor and I.

I think one of the biggest concerns is how USC handled it. I mean, USC paid to fly me home, so they admitted that there was an issue in Italy, and they admitted that they were involved by flying me home.

But once I got back, how they handled it -- I mean, when I met with Dale Moore, he didn't seem very competent with the policies kind of surrounding what might be a possible channel for me

to go down.

Carl Wells didn't seem very competent either and didn't handle my complaint even within the realm of, like, the -- the proper way that you're supposed to follow a Title IX complaint.

Q Okay.

A And so that's, you know, one of the things I'm complaining about currently. But, I mean, within this -- I'm obviously complaining about what happened in Italy and the fact that I believed it's a school-related trip, which is why I'm complaining about it when I came back.

Q Now, you said you believe USC admitted that you were in Italy as part of a USC sanctioned trip; is that correct?

A I'm saying that by flying me home, USC kind of admitted involvement or that there was some gray area where they were involved in having to fly me home.

Q Okay. Did anyone from USC tell you that, or that's your assumption based on the fact that they paid to fly you home?

A That's my assumption based on the fact that they paid to fly me home.

Q In your previous response, you said a lot that I

want to sort of break out.
A Absolutely.
Q So you filed your EOP complaint of which Exhibit 3 is part of your statement; correct?
A Correct.
Q Then you said you also had complaints about how USC handled the situation. I need to be specific. Are you talking about how USC handled your EOP complaint, or are you talking about the fact that you had no other avenue to complain?
A Both of those things.
MS. ALBRECHT: Object to the form.
Q (MR. GESSNER) So breaking that out, I think you had said earlier, and I may be paraphrasing here, but your complaint didn't exactly fit into a Title IX EOP complaint; is that correct?
A Not in the traditional way.
MS. ALBRECHT: Object to the form.
Q (MR. GESSNER) Okay. And so you sort of shoehorned your complaint into the Title IX procedures; is that correct?
A No. I wouldn't --
MS. ALBRECHT: Object to the form.
A -- say shoehorning is the best way to describe it. I believe that it fit underneath it. Had they done

the appropriate investigation, I think they would have found that it did fit in some ways underneath that.

What I was saying was that there should have been -- as a graduate student, there should have been an alternate way for me to complain. That shouldn't be the only way for students to complain formally.

Q (MR. GESSNER) Okay. So other than a Title IX EOP complaint, what do you contend should have been available to you as a graduate student?

MS. ALBRECHT: Object to the form.

A I believe based on my, you know, research through different policies, one, it's super hard to navigate, you know, USC's system of policies. And there will be policies in place, but they'll have policies like staff policy, whatever, or, you know, various policies. But they don't list out ways to pursue filing complaints.

They have policies that say, you know, this is, you know, what should happen or this is what shouldn't happen, which basically amounts to people -- you just email somebody and be like, "Hey, I have an issue," and then it goes to a panel. And then that doesn't ever really go

anywhere.

There's no way that -- to put in a formal statement like I did at the EOP office and have somebody do an investigation, which didn't actually happen. But this was the only way to have that kind of formal procedure. There isn't another avenue that has a formal procedure like that.

There's a bunch of appeal processes, but there was nothing that fit within this. And I believe in the conversation that I had with Dale Moore, he kind of gets at that by his kind of circular way of talking that there isn't a specific way to complain.

Q (MR. GESSNER) Okay. Now, you said several times about if there had been a proper investigation. Why do you contend that a proper investigation had not occurred?

A Well, in between the time that I originally contacted Carl Wells and had my initial meeting with him, he redirected my complaint so many times. He didn't, you know, get the right -- he was supposed to allow David to have a statement within a certain amount of time. That didn't happen. And this thing was so ongoing until up until, like, August.

And at that point he was like, "Do you want to do a formal complaint?" And I was like, "This is what should have been occurring this whole time." Like, "Do you want me to proceed with an investigation?" This is what should have been occurring this entire time.

And that didn't happen until towards the end, and they didn't even do a full investigation. It kind of got rushed through, like they didn't follow the proper steps that you would do in Title IX.

Q Okay.

A He kept redirecting it into an informal complaint, which is clearly not what I wanted. And you can see that within the emails between me and Carl Wells.

Q And you may not be able to answer this. But you had said where he didn't follow policy.

What wasn't followed specifically?

A He kept redirecting my complaint.

Q How so?

A Because he kept listing it as an informal complaint. And he didn't follow procedures as in, you know, like I said a second ago, getting, you know, the statements from the appropriate parties as he should have done, you know, compiling kind of

evidence to, you know, go forth with an investigation.

He allowed David's statement to come from a letter to Allen Miller, which is also -- he's named in my complaint. So that was completely inappropriate as well.

Q Okay. To the best of your knowledge, do you know what statements were given to Carl Wells?

A What do you mean specifically?

Q Who gave statements to Carl Wells?

A I know that I gave a statement. And David was supposed to give a statement, which kept getting deferred until months later, at which time he provided his statement, which was not actually a statement. It was a letter to Allen Miller and not to the EOP office.

Q Okay. Now, did Allen Miller send that statement to Carl Wells, or do you know if David -- Professor Voros took that statement, edited it, and then sent it to Carl Wells directly?

A I'm not certain at this time.

Q Okay.

A But I'm sure that it is within the documents that I've provided.

Q Do you know if there was a statement by Cody

Unkart?
A I believe David had him write a statement when he was in Italy to kind of back up his idea of what the contractual relationship was.
Q Okay.
A But I don't know if there was anything given to the EOP office.
Q Okay. What about any statements by Antonio Griffin or Alex Stasko?
A Not that I'm aware.
Q Okay. So what was the outcome of the EOP investigation?
A I believe they tried to mediate at first before they even went through with the investigation which was a -- anyway. They ended up finding that it did not fit within the realm of Title IX.

But like I said, I don't believe that they ever did a full investigation.
Q So you said they tried to mediate. Do you believe that was improper?
A I believe it was improper considering I filed a formal complaint. And they had -- a mediation was supposed to follow an informal complaint, which is what they kept redirecting it to, and then tried to mediate first before doing the investigation. So

that's why I believe it was improper.
Q Okay. You said they found the complaint did not fit within Title IX. Is it your contention that your complaint did fit within Title IX?
A I believe --
MS. ALBRECHT: Object to the form.
A I believe that it did fit within Title IV or at least certain parts of it fit under Title IV enough that it should have gotten more of a response rather than the dismissal that it did, at least enough to where they could have taken it somewhere else. Like, "Hey, there's, you know -- this might not necessarily fit fully under here. Let us redirect you to a different complaint avenue."
But, again, there wasn't really anything that existed for that. But I do think that something could have been done under Title IX had they done a complete investigation, which I don't believe that they did.
Q (MR. GESSNER) Okay. When you filed your EOP complaint, were you alleging that you were discriminated against on the basis of your gender?
A Yes.
Q Did you say that specifically?
A I believe that is what we filed the EOP complaint

under because you had to choose, you know, a different subsect of the EOP -- the type of complaint.

Q But in all of your statements and emails and everything, did you ever say that you believe you were treated differently solely on the basis of your gender?

MS. ALBRECHT: Object to the form.

A I believe I said that somewhere.

Q (MR. GESSNER) Okay. You said several times "if EOP had done a proper investigation." What actions do you think they should have done that they, in fact, did not do?

A I think this would be me reiterating some of the things I already said. But I think they should have followed the proper procedure of the Title IX investigation. I mean, they let David make a statement, like, months later.

Like, they took a process that should have been completed in a short amount of time, and they drug it out for months until it went into the next semester when it shouldn't have taken that long.

Q Okay. What would have changed if they had done everything in a timeline you describe?

A I think that they should have actually gathered

more evidence and completed a more full investigation. And I think that they would have found that there was some -- that it would have fitted under the, like, gender discrimination or harassment.

Q Okay. What evidence?

A Excuse me?

Q What evidence?

A What do you mean?

Q You said they should have "gathered more evidence."

A Oh, statements from Cody Unkart, Antonio. They could have gotten, you know, copies of, you know, messages sent between David and I, emails. That type of thing.

Q Okay. Did you send copies of emails between you and Professor Voros to Carl Wells?

A I can't recall specifically what I sent to Carl Wells at this time. I'm not certain. It's possible that I did.

Q Did you give Carl Wells copies of the recordings you made?

A I don't believe that I did.

Q Okay. So after you received Carl Wells' findings that the complaint did not fit within Title IV, what did you do?

A I think that I tried to do some type of appeal because I asked what the next step would be if I didn't agree with the decision. I think Carl Wells actually -- you know, I think I asked him, and he said that I could contact -- I don't remember specifically at this point who I contacted, and I'm sure it's somewhere in the documentation.

But I tried to appeal the decision, which I believe the process was that like a panel was created, and they were supposed to go through the evidence that they had from the EOP. But, again, I don't think that the EOP fully collected the evidence, so I'm not sure how accurate their investigation was.

(Defendants' Exhibit No. 5 marked for identification.)

Q Backing up just a little bit, I'll show you what's been marked as Exhibit 5.

Have you ever seen this before?

A Yes.

Q Okay. What is it?

A It looks like a report from the EOP. I remember it because they listed Alex as a male student.

Q Okay. This is Carl Wells' report about his investigation and his findings with respect to your complaint; correct?

A Correct.
Q Okay. And it contains a copy of your statement?
A Yes.
Q And then if you go to -- on the top, it's marked page 195. Does it contain a copy of Professor Voros' response?
A Yes. But not the original response.
Q What do you mean by "the original response"?
A The original response was addressed to Dr. Allen Miller. So that's obviously been removed from that.
Q Okay. Look forward to -- going by the numbering on the top of the page, page 199 and on 200, do you see copies of statements from different witnesses?
A Yes, I see that.
Q Okay. And go to the next page, 201. In the middle of the page it's marked "Questions in this matter are as follows."
A Wait. Which section? I'm sorry.
Q Page 201.
A Uh-huh. Okay.
Q In the middle it says "Questions in this matter are as follows."
A Yes.
Q Okay. The first question listed there -- it says,

"Is it more likely than not that the complainant," which is you, "was subjected to gender-based harassment?"

In your opinion, is that an appropriate question for Carl Wells to be asking?

A Yes.

Q Okay. And the next one, "Is it more likely than not that the complainant was subjected to gender-based discrimination?"

In your opinion, is that a proper question for Carl Wells to be asking?

A Yes.

Q Okay. Third question, "Is the evidence in support of the claim of harassment and discrimination weightier than the evidence against the claim?"

Is that a proper question for Carl Wells to be asking?

A Yes.

Q Okay. Fourth one, "Did the charged party," that would be Professor Voros, "use the word 'bitch' in referring to the complainant?"

In your opinion, is that a proper question for Carl Wells to be asking?

A No. I think it's irrelevant.

Q Okay. Why would that be irrelevant?

A Because it's not accurately describing what was said in the conversation. So I don't think that that's a good basis to determine -- which clearly, since it's listed here, that he's using that as a basis of the harassment. And so I don't think that really is relevant. And that was one of my issues before with this process.
Q Well, let me ask you: Professor Voros never called you a "bitch," did he?
A No.
Q He said, "All you've done since you've gotten here is bitch"?
A Yes. And that's what I told Carl Wells.
Q Okay. He used it as a verb, not as a noun.
A Yes. Correct.
Q Okay.
A So even the next question I don't think is ...
Q Right. And that's -- "Does the use of a single gender-based expletive constitute harassment?"
You don't think that's a relevant question?
A No. Because the question before that is not relevant either in determining whether there was harassment.
Q Okay. Because it didn't occur?
A Because it didn't occur. That's correct.

Q So if Carl Wells is not going to analyze -- when he calls the use of a single gender-based expletive -- what should he have been considering as evidence of gender discrimination?
A The way that I was treated different than the two male students that I was with. And also treated differently than the female student-employee -- I'm not sure what her title is. I know she's an employee of USC now -- different than her as well.
Q Okay.
A So I think he should have questioned more into what was the harassment rather than focusing -- which it seems like here that he's focused his analysis on the "single use of the gender-based expletive" constituting as harassment.
That's what he seems to have focused his, you know, findings on. And I don't think that's correct. And I expressed that to him, but it didn't matter.
Q How exactly were you treated differently?
A I was told that my level of work was not on par with the work of, you know, the male students. And when I actually voiced concerns, it was considered me bitching or me, you know, just complaining and just being dramatic girl. Like, that's kind of

what it was.

And then as I've stated, and I'm sure you've read in my complaint, I say that there is a relationship between Alex and David which got her better treatment. There was not a relationship between David and I, so I did not receive that kind of preferential treatment.

So I think that's what should have been looked into here, and it was not. It was clearly hyperfocused on the word "bitch," which is totally irrelevant to what I was -- my complaint and my statement.

As you can see here in the statement from Alex, "I immediately noticed how unsatisfactory her performance was as a worker especially when compared with the other two assistants and myself" -- who did not work at all. She didn't do any work. And so she's comparing it to Cody and Antonio. So that's a good basis there for the way that I was discriminated against because I was the other female that was there.

Q Okay.

A And she's comparing it directly to the workabilities of the two male students.

Q You had said earlier today that Cody and Antonio

did some of the work, like lifting heavy furniture, because you were not able to; correct?

A Yes.

Q Okay. Do you think that's what Alex is referring to?

A That's the only thing that I can think of because there was no other occasion. And you can actually kind of see it in the statements from Antonio, it appears, and from Cody. Neither one of them say anything about my inability to be doing work.

Q Okay.

A Only Alex did.

Q Do you know if anyone in Italy complained about you spending a lot of time on your phone and not working?

A I believe Alex said something about that. But the only time I spent time on my phone, because I didn't have service as I had mentioned earlier, was to play music while we painted a basement.

So I mean, I'm aware that she said something about that. But I don't think it was warranted. I think it was, you know, being nitpicky and having -- creating something to kind of have -- create a judgment on me about.

Q Okay. So you don't know if Cody or Antonio said

anything about that?
A No. And I'm looking at their statements now. And I don't see anything about anyone else saying that I was on my phone.
Q Okay. So going back to when you were walking back to Monte Castello and you're on the side of the road. Professor Voros pulls up, gets out of the car, and you're having what he called the group discussion.
I think you had said that that was the first you understood that it was Professor Voros' belief that the arrangement was one of an employer-employee and you were there to work in exchange for food and lodging; correct?
A The first time I would say that he said that prior to that in the email when we got stuck in Terni and I was trying to communicate with him and figure out, you know, how we could get back that evening as planned because we didn't want to be stuck in a foreign town.
And he began to communicate, like, you know, "This isn't my problem. You guys are here as employees. You're adults." Like, you know, that's when he first stated it, but he reiterated it in more aggressive manner on the side of the road when

we met him at his car.
Q Okay. Is it fair to say that at that point you challenged Professor Voros as far as the arrangement in Italy?
A By "challenge," do you mean that I disagreed --
Q Correct.
A -- and stated my disagreement? Then, yes.
Q Okay. Did Cody or Antonio state their disagreement?
A Not at that time.
Q Okay.
A They were less vocal than me the entire time. But they did share some of my concerns. I was just the one to vocalize and verbalize it.
Q Okay. So to the best of your knowledge, Cody and Antonio did not verbalize any sort of disagreement with Professor Voros while y'all were standing there on the side of the road?
A No. They just kind of sat there silently. And, you know, I think part of that had to do with the fact that Antonio felt very indebted to David because he paid for his flight there and, you know, his accommodations and everything as, like, kind of -- from his kind of financial background and that kind of thing, he felt very indebted to be

there and very, like, grateful in that respect. And so he was willing to do anything to be there and to be more, I guess, complacent with, you know, what he was asked to do even though it was different than what he expected as well.

Q You said Professor Voros paid for Antonio's flight; is that correct?

A That's correct.

Q And you paid for your flight?

A That's correct.

Q Okay. While y'all were stuck in Terni, I think that's when you had emailed Professor Voros -- Professor Voros had said it would take him over two hours to come and get you. You sent him an email challenging him on that; is that correct?

A That is correct.

Q Do you know if Cody or Antonio did that?

A I believe that Cody tried to call Professor Voros, and was unable to get through. He did offer us, I think, some kind of solution in terms of somebody from the village or something could come pick us up if we paid a certain amount of money because he said it was too far for him to come, which at that point I messaged Eros, and I was, like -- kind of explained to him the situation, I believe. And he

said that it was only a 30-minute drive. So that's kind of when I became confused as to why we were, you know, stuck in this foreign town when there was the overwhelming ability for it to be resolved.

Q Okay.

A And steps weren't being taken to do that.

Q So you emailed Professor Voros asking why he wouldn't come get you?

A Exactly.

Q Okay. But to the best of your knowledge, Cody and Antonio did not do that?

A Did not send emails, no. They tried to call him. And I don't know what transpired between those phone calls. You'd have to ask them that. But they were as concerned as I was with being stuck.

Q Would you agree that at that point in time you were sort of the sole voice of dissension?

A I don't know that I was the sole voice of dissension. I'll like -- I mean, if by "dissension" you mean that I was, you know, trying to get us out of being stuck, then, yes.

Because the guys were kind of panicky as well about being stuck there. And in that panic, they were kind of like unable to, like, act upon it. And so we were all trying to figure out solutions.

And their solution was, you know, just to sleep in the airport because they didn't know what else to do.

And so I was like, "Well, let's at least, you know, exhaust our options here and see if, you know, David can actually come help us. He's not far away." Like, "Let's see what's going on."

Q Okay. You had said earlier that Carl Wells tried to mediate, but you never did agree to any sort of mediation; is that correct?

A That's correct.

Q Okay.

A I don't know what his mediation terms were either. That was never provided to me. He just said "mediation."

Q It never went any further that him saying, "Would you like to mediate?"

A Yeah. That's it.

Q Okay. And do you know if by policy he was required or allowed to ask whether you preferred mediation?

A I'm not certain.

I think for -- this is just me, like, personal understanding. I think that for an informal complaint that's the appropriate route, and he could have asked if I wanted mediation. Or could

have asked, at that point if I was doing the informal complaint, if I wanted mediation or if I wanted to pursue a formal complaint.

But because I started the process asking and requesting a formal complaint, it shouldn't have gone that way without getting the statements and appropriate evidence and doing the investigation first.

MS. ALBRECHT: Off the record.

(Off the record at 12:25 p.m.)

(Back on the record at 1:31 p.m.)

Q (MR. GESSNER) Okay. We are back on the record after taking a lunch break.

Ms. Dunavant, you had said you wanted to make -- say something about an exhibit? What is that there?

A Yeah. When we were talking about before the Letter of Determination, I just wanted to point out that the history of the case is incorrect as well.

Date incident occurred, May 1. I wasn't even in Italy May 1.

Date the EOP office opened this case, May 23. I hadn't met with Carl Wells at this point.

EOP hearing, May 23. Still hadn't met with Carl Wells. There's no way there could have been a

hearing at that point.

So I just wanted to make sure --

Q Okay.

A -- that that was on the record. That that was incorrect information as well.

Q I understand. Now, the first part where it says under "History of the Case" -- what exhibit number is this one?

MS. ALBRECHT: 5.

Q (MR. GESSNER) In Defendants' Exhibit 5, under History of the Case, the first line there says, "Date incident was reported to the office of Equal Opportunity Programs, May 16, 2016." Is that accurate?

A No.

Q Okay. Because you didn't report --

A No.

Q -- to the EOP on that date?

A No.

Q Okay. Do you know if someone else did?

A No. Because I hadn't spoken with the ombudsman yet.

Q Okay. So you don't know --

A So it wouldn't have made it to that.

Q -- whether or not Allen Miller or someone else at

USC actually brought Carl Wells in on the discussion?

A No.

Q Okay. All right. And then before we broke for lunch, we were talking about this -- we had gone through the questions and the determination. Okay.

So Mr. Wells makes his determination. And I believe you filed -- that you were talking about how you had filed an appeal; is that correct?

A Yes.

Q Okay. Let me make sure I've got what I think I have.

(Defendants' Exhibit No. 6 marked for identification.)

I've handed you what's been marked as Defendants' Exhibit 6. Please go ahead and take a look at that and tell me if you've ever seen any of these documents before.

A Yes, I have.

Q Okay. And does this comprise at least some of your communications with a Terrie Smith?

A Yes.

Q Who is Terrie Smith?

A I'm not sure what her specific title is at the moment. But I know she's the one that was on the panel that reviewed my appeal of the EOP's

findings.
Q Okay. And the panel issued a report with respect to their review -- we'll call it Wells' findings -- is that correct?
A Yes.
Q Is that -- if you look at the last three pages of Defendants' Exhibit 6, it starts on the bottom. It's marked USC 0403.
A Yes.
Q Have you ever seen that document before?
A I have.
Q Okay. That's the panel's recommendation to President Pastides; correct?
A Correct.
Q Okay. And then pages USC 0401, 0402, is that President Pastides' letter to you wherein he states he agrees with the panel's findings?
A Yes.
Q Okay. Now, you initiated this appeal by filing an email -- or sending an email to someone; is that correct?
A That is.
Q Do you recall who you emailed?
A I believe I emailed multiple people, and she's the one that responded. Or I don't know if it's a she

or a he.
Q Now, at some point you stated a concern to Dr. Smith about the evidence that was considered by Carl Wells; is that correct?
MS. ALBRECHT: Object to the form.
A Yes.
Q (MR. GESSNER) Okay. And, in fact, I believe you asked Dr. Smith what evidence was in the file. Do you recall that?
A Yes.
Q Did Dr. Smith respond to that?
A She says, "If you presented it to the EOP, then we have it." Although I don't believe that that was the case.
Q What makes you think that?
A Because the EOP didn't ask for further documentation, which I respond to in the email you see here on the page that says USC 0389, where I'm responding to it saying that -- I'm asking for the evidence and saying that this isn't what's in my written oral statement.
So clearly they didn't receive those as well. Did not use or list the evidence I provided -- photographs, audio recording -- none of those went forward within that. And I state that here in this

email on that page.
Q Okay. And on that page 389, does Dr. Smith respond to you, saying, "We have all the information that EOP has, but if you want to provide more information, go ahead and send it to me."
Is that essentially what she says to you?
A Yes.
MS. ALBRECHT: Object to the form.
Q (MR. GESSNER) Okay. Did you send any additional evidence or anything else to Dr. Smith?
A It looks that I did. If you see the email and the page prior to that, it says, "Please see the attachments and read thoroughly through my letter." So it would appear that I did send attachments with that email to respond to the email.
Q Okay. Do you recall what the attachments were to that email?
A No, I don't recall at this moment. But it would appear that I did provide them.
Q Okay. I take it you disagree with the panel's findings and President Pastides' adoption of those findings; is that correct?
MS. ALBRECHT: Object to the form.
THE DEPONENT: I'm sorry. Can you repeat what you said?

Q (MR. GESSNER) Do you agree or disagree with the panel and Dr. Pastides' findings with respect to your appeal.

MS. ALBRECHT: Object to the form.

A Yes, I disagree.

Q (MR. GESSNER) Okay. On what basis?

A On the basis that I don't believe that they properly reviewed the information seeing as they didn't even have all of it.

Q But we just said that you had emailed whatever additional evidence you wanted them to consider to Dr. Smith.

A Yes. But I did that on October 17. And their conclusion -- it states here on October 19, which would not have given them time to formally investigate the complaint as I had requested.

Q What makes you think that?

A Because of the email on page USC 0388.

Q But you can't say with any degree of certainty what the panel did or did not review, can you?

A No. Because they didn't give me access to any of the information even though I had asked for it.

Q But you were given the opportunity to present evidence; correct?

A I was given the opportunity to email things. But I

was never given the opportunity to be present at the panel, which I should have been able to present to the panel itself.

Q Are you aware of any policy or regulation which states that you have a right to attend any sort of meeting or hearing or anything in front of the panel?

A I believe --

MS. ALBRECHT: Object to the form.

A -- that there is a policy. I don't know specifically right at this moment what that policy is.

Q (MR. GESSNER) Okay. So as you sit here today, is there any piece of evidence relating to your EOP complaint that was not considered by either Carl Wells or the appellate panel?

A It's hard to answer that question because I don't know what this panel had access to. As you can see in the emails where I asked them what materials that they had so I could see if I was sending them all of the ample materials, and they never provide that to me.

So it's -- I can't answer that question.

Q Okay. Well, Dr. Smith said, "Hey, if there's anything you want us to consider, send it now," and

you replied, and you said you sent some attachments.

A Yes. I don't know what the attachments are.

Q So you --

A I don't have recollection right now of what was sent.

Q Fair enough.

A Or what the EOP recorded that they had. I mean, I wasn't aware of that either. So that kind of made it hard to know if I provided enough information or if the EOP recorded information that I provided to them.

Because clearly in the last -- Exhibit 5, Carl Wells based his determination off of the "single gender-based expletive" constituting harassment when that's not at all what my complaint was. That's the least concerning part.

So it's hard to know what he actually gave to this panel. I wouldn't be able to say on that.

Q Okay. As you sit here today, what evidence do you have -- or what evidence exists to prove that you were the victim of gender discrimination by Professor David Voros?

MS. ALBRECHT: Object to the form.

MR. GESSNER: Your objection is noted.

A I would even say -- I mean, just to add something, like, that comes to mind immediately, even the -- this thing right here where it's talking about I'm being insufficient in my, you know, work duties, and the only person that said that is Alex who I believe that, you know, David has had a relationship with.

The other two guys don't say anything about that. That's just an example. Obviously beyond that, it's kind of difficult to provide specific, you know, past he said/she said type thing. But that's just one of the examples that's coming to mind right now. I'm sure that there is more.

Q Like what?

A I mean, that's all I can currently think of. But if I think of more, I will let you know.

Q Okay. What you've stated so far today is that you were treated differently than everyone else in Italy. And it seems to me like it just so happens you're female and, of course, Cody and Antonio are males.

A Uh-huh.

Q Alex was also there. But she wasn't quite situated as you and the two guys, was she?

A No. She didn't perform any of the same work duties

that we did.
Q Correct.
A She was usually with David by herself. I don't know what they were doing.
Q So it just seems to me it just happens to be that you're a woman and the other two guys are male.
A Exactly.
Q And not necessarily because you're a woman. And that's why I'm asking for evidence showing that you received different treatment because you are a woman, not because of any actions you took or didn't take.
A Uh-huh.
Q But just solely on the basis of your gender.
A The only thing I can --
MS. ALBRECHT: Object to the form.
A -- think of to address that question is the fact that I was reprimanded and yelled at by David. And clearly Alex says in her statement as well that I wasn't doing the amount of work and that, you know, might have caused the explosive anger, outburst that I received from David because I wasn't doing the amount of work when I was doing the same work except for the furniture lifting which would directly relate to me being a female because I

wasn't able to keep up with that kind of manual labor.

Q (MR. GESSNER) Okay. And you're not aware of Cody or Antonio complaining about your work performance in Italy?

A No. And they don't say it in their statement that they gave to the EOP either.

Q Now, part of your lawsuit is you allege retaliation; is that correct?

A Yes.

Q Okay. What -- or how were you retaliated against?

A When I came back from Italy, my assistantships were completely messed up because I was supposed to TA for David's wife at the time, and we weren't able to do that, and I changed all of my classes.

And the university and the department were supposed to help me fix my schedule, and they didn't do that. They kept delaying and delaying well into the semester. So I had to accommodate myself even though the EOP put in a no-contact order between David and I and said that I would need to change my classes.

That wasn't -- that was never done. I mean, I had to do all of it myself when I came back.

Q Okay. Do you recall when classes began? So that

would be fall of 2016.
A August 2016.
Q Okay.
A And I also was later made aware of the fact that a BIT report was filed against me while I was in Italy and trying to get out of Italy which is essentially like a behavioral -- reporting me as a behavioral problem and David's statement to the EOP saying that I had a mental breakdown in Italy.

So when I came back, all the professors that I had and people there kind of treated me like I was, like, mentally unstable. And so I had to kind of go forth with that kind of, like, reputation. Because obviously they would believe someone like him over what I had to say until later on when there is, you know, some validity and some other things came forward.

Q Okay. So kind of unboxing what you had said. You talked about your assistantships. You were supposed to have a graduate assistantship for Pam Bowers; is that correct?
A That's correct.
Q Okay. And at the time she was Professor Voros' wife; correct?
A Correct.

Q Okay. Did you have any reason to believe that Pam Bowers would mistreat you in any way, shape, or form?
A Based on David's relationship with Alex, I just did not want to put myself in the position of being around his wife and, you know, her relationship with being co-owner of the ICA. I didn't think that that was a good idea for me to be in the class, and the department agreed with me on that to be TA'ing with her especially since the EOP never did anything with my complaint.

The only thing that I wanted to do was finish my studies, and so I wanted to remove myself from all of that as much as possible, and that included not being TA for her course.
Q Okay. So were you a TA for anyone in the fall of 2016?
A No. Well, I was a graduate assistant for the Young Artist Workshop for the art education department. But that's not necessarily a teaching assistantship because it doesn't require any teaching. It's not what I should have been doing.

I asked to switch my assistantship, and I talked to Graciano and I believe there's emails that record that kind of, you know, me trying to

figure out what we could do. And he said that I couldn't switch unless another grad student wanted to switch with me, but I wouldn't be able to do it.

So I kind of -- just because I needed the, you know, financial assistance and the tuition assistance -- found my own assistantship and got the Young Artist Workshop one which is in the art education department.

Q Okay. So you still got the stipend and the tuition --

A Yes. Because I accommodated myself and found that.

Q Okay. Were you supposed to take any courses with Professor Voros in the fall of 2016?

A I was supposed to take courses with Voros and with his wife -- ex-wife, whatever. Because they're the only two professors that comprise the graduate painting program.

Q Okay. So you had to change your schedule. But the university set you up with Jaime Misenheimer; is that correct?

A They set me up to inquire with her about doing an independent study within a lower level class that she was teaching. This didn't occur until about two weeks after the school year had already started. So I was behind schedule on that, and it

just -- it didn't work out. Because they had to convert her to a graduate professor because she was just an adjunct.

And the class that I ended up taking with her was not really, like, painting. It was like a lower level class, and I opted out of doing that because I was -- like, I only get one credit for that, and it wasn't really the class that I needed. It was just kind of like a -- "we'll put you in this and give you credit for something without actually giving you the instruction that's on par with the classes you should have been taking."

Q Okay. But prior to the fall semester of 2016, Jaime Misenheimer was not part of the graduate faculty; is that correct?

A That's correct.

Q Do you know if USC actually set it up so that she would be able to teach graduate level courses?

A I know she was -- they were trying to do that. I believe now she's still just an adjunct. I think they were just trying to get permission so I could take the one course.

Q But you did not take a course with her; is that correct?

A No.

Q And that was your own choice; correct?
A That was.
MS. ALBRECHT: Object to the form.
A Because it wasn't a sustainable solution to the problem. Because without taking classes from David or Pam, I wouldn't have been able to get my painting concentration anyway. And she wouldn't have been able to continue giving me independent study classes because you can only take, I believe, two while you're in grad school. So it wouldn't have been a feasible option, nor would I have been able to get enough credits to still have my painting concentration going down that route.
Q (MR. GESSNER) Okay. Now, of course, I don't have an arts degree. So when you say a "concentration," how does that work out? Is that something that's actually, you know, written on your degree? What exactly is that?
A So it's actually like a requirement now that you do it. And you have to have a certain amount of credits in a particular area to have that concentration. So you can do like drawing, printmaking, et cetera. And that gives you kind of the experience to -- when you go to adjunct later on or to teach, you have that background so you

could get hired under that field.
Q Okay. And do you have any sort of concentration along with your MFA?
A No. My degree doesn't have a concentration anymore.
Q Okay. Now, you mentioned a BIT report. What is a BIT report?
A I believe that it is an interpersonal violence report or a behavioral -- some kind of behavioral report that says that I'm a behavioral issue or that I could be possibly a harm to myself or to others.
Q Have you ever seen any such report with respect to you?
A Yes. I saw a copy of it.
Q Okay. And did it say you were a behavioral health risk or anything like that?
A I mean, that's what the report is for. And I'm listed on it, yes.
Q Okay. Was it not memorializing sort of your complaint about what happened in Italy?
A No, I don't believe it was.
Q It wouldn't be construed as a complaint that you were making against Professor Voros?
A No. I thought that initially it was in my favor;

and then after further research later on, I realized that it was not.

Q What research?

A I mean, just going back through and looking at kind of the course of different things that happened and rereading the BIT report. Because initially it was my assumption that it was in relation to me filing a complaint when really the BIT report was against me.

Q Okay. What else do you claim was retaliatory action taken against you?

A I'd just say like the treatment of myself within the department. My entire degree got kind of messed up and derailed, and I didn't get the same type of assistantships as everyone else. I didn't get to even teach until my third year when some students were teaching in their first year.

Q Okay. And you think that was in retaliation for your EOP complaint?

A Yes.

Q Like I said earlier, I went through a whole bunch of documents, but I have almost no context with which to gauge what the documents are about. But I had seen some emails where you're talking about -- they have a GIA and a GTA.

A Uh-huh.
Q Does that make sense to you?
A Yes.
Q What is that --
A The graduate teaching assistant and the graduate instructional assistant. So one would be usually like an instructor of record, like you're actually teaching the class. And then the other one would be you're assisting the teacher of the class.
Q Okay. So there's a difference between the two; correct?
A Yeah.
Q Were you not able to do one versus the other?
A I wasn't able to be an instructor of a course or even TA for a studio course until my third year. Because I kept asking about it and eventually they let me teach a drawing course.
Q Okay.
A But prior to that, I didn't have any assistantship within the realm of studio art and what I had intended and what was planned for me to be doing. Like my peers were doing.
Q Okay. And as you said earlier, you think that was in retaliation for your EOP complaint?
A Yes.

Q Okay. I've seen a whole bunch of emails, and I see where you asked about that. And my understanding was it was because there was sort of a prerequisite you had to do before being either a GIA or being the teaching assistant for a studio class; is that correct?
A Yes. They make you, like, be the assistant for a studio course --
Q And you had --
A -- prior to -- and because I couldn't do the one with Pam, I wasn't able to jump right in.
Q Okay. And when you brought that to the faculty's attention, they did, in fact, allow you to do; is that correct?
A But not until my third year. So I missed out on two years of experience that I could have had.
Q Okay. Is there any other retaliatory actions you can think of as you can sit here today?
A There was one incident I remember. David actually had us bring in stuff to Italy from the USC, like, School of Visual Art and Design. He had us bring materials from both there and from his personal home. And there was a book that I transported to Italy and left in Italy because it was a really large book. He actually asked us all to bring

things.

And later on I was contacted through the department about returning this book that I did not have. And there was kind of some emails back and forth between myself and Dr. Graciano, and I believe the point of that was, again, to reiterate the fact that I was some kind of behavioral problem.

Q Okay. So Dr. Graciano asks you -- he just said, "Hey, do you have any of Professor Voros' books?" to which you responded that you did not; correct?

A Yes. And the emails continued. Like, it continued to be like a thing. It's like, "Hey, you can just return them to, you know, the main office of the School of Visual Arts and Design." And I was like, "I don't have any books. And if they're his personal books then this isn't an issue for you to be involved in. And if they're the school's books, why were they being transported by myself over there?"

Q How many emails did you get about the books?

A I don't know specifically off the top of my head.

Q So if I said two, would you have any reason to dispute that?

A Two from Graciano?

Q Yes.
A That sounds like it could be correct. I'm not entirely sure, though, so I can't fully agree with that or not.
Q All right. Were you ever forced to pay for the books?
A No.
Q Was any adverse action taken against you for not returning any book?
A No.
Q Any other retaliatory actions you can thing of?
A I can't think of anything else at this time. Although I'm sure there's stuff within the documents that's just not coming to my mind right now.
Q Yeah. And I've seen a bunch of emails, so I'm going to -- I'm going to ask you about them just because -- you know, I've gone through all the documents --
A Absolutely.
Q -- and I'm taking it you have not.
Actually, now that I mention it, what have you done to prepare for today's deposition?
A I spoke with Samantha a few times on the phone.
Q And I just want to say: I don't want to know the

substance --

A Yeah. No, fine.

Q -- of any conversation you had because that's protected.

A And then I reviewed the amended complaint which I think I have a copy of somewhere down here.

Q Right. I think that was the first document I gave you.

A I did read over my conversation with Magdalena. But I haven't -- it's been a while since I've looked at some of these documents.

Because, again, as I said before, after, you know, the EOP kind of let me down on their determinations, I kind of just wanted to finish my degree as peacefully as possible and just get out of there.

Q Okay. At one point did you withdraw from a class due to some issue with your back?

A Yes, I did.

Q Okay. What course was that?

A Lithography.

Q Okay. What is "lithography"?

A It's a printmaking technique where you etch into stone with chemicals.

Q Why did you withdraw from that class?

A Because I had a lot of issues with my back and moving the stones around. They're pretty large, and you have to wheel them around on carts.
Q Okay. Do you know how much they weigh?
A No. A few hundred pounds.
Q Okay. What was the issue with you withdrawing from that class and getting a refund? What happened?
A I had to go back through Ombudsman Dale Moore.
Q Okay. Correct me if I'm wrong, you dropped the course after the date you would have received a full refund; correct?
A Uh-huh.
Q Is that a yes?
A Yes. Sorry.
Q That's okay. So you had to file some form or claim of extenuating circumstances?
A Yes. That's correct.
Q Okay. Do you believe that any of that or in your experience in getting that full refund was in retaliation for filing your EOP claim?
A Yes.
Q Okay. Why?
A Because I had to go back through Dale Moore.
Q Why did you have to go back through Dale Moore?
A Because he's the ombudsman. He's the one that kind

of direct you to the different outlets of where you can file these different things. He's kind of the channel for several different processes for grad students. Unfortunately.

Q Why do you say "unfortunately"?

A Because my experience with him the first time was not very helpful.

Q Okay. So you withdrew from the course. You initially only got a 20 percent refund; is that correct?

A Yes.

Q Okay. And you were told in order to get a full refund you would need a doctor's note; is that right?

A That's correct.

Q And you refused to produce a doctor's note; is that correct?

A No, that is not correct.

Q Okay. Because I've been through all the emails, and I have not seen any doctor's note that you presented.

A I did produce doctors' notes, various doctors' notes actually, regarding my back injury.

Q Okay.

A And MRI results as well.

Q Okay. When -- or do you recall when you presented that?
A No. I don't recall specifically. I do remember that Dale Moore kept saying that every time I gave him a different doctor's note -- and I gave him several -- he kept saying that that wasn't sufficient. "This is insufficient. This isn't sufficient." And so I had to keep jumping through these hoops of, like, providing more.
Q When you say a "doctor's note," are you referencing the Explanation of Benefits that you provided?
A No.
Q Did you present an actual note, like a letter, statement --
A Yes.
Q -- from a physician?
A I did.
Q What physician?
A From, I think, it was Midlands Orthopaedics. The PA that was there actually wrote me a letter and had it sent.
Q But you don't recall when --
A I don't recall specifically when. I do know that Dale Moore was in receipt of it. And he did say several times at first when the doctor tried to

send over the note -- he's like, "I can't open it. I can't access the file." So it was sent over several different ways for him to access it.

Q Okay.

A And they also gave, like, the actual notes from the doctor's office where it said, "Allison was in here," you know, for this visit here and here and here, and then I got the letter as well from the PA at Midlands.

Q So all I've seen so far was an Explanation of Benefits that just shows what medical professional you saw and what date you saw them. It doesn't say why. And I saw a couple pages of records from Doctors Care that were heavily redacted.

Do you recall that document?

A Yes.

Q Okay. Would it be fair to say that that document said that you were there -- you presented and you were complaining of back pain; correct?

A Correct.

Q Okay. But it didn't have any diagnosis in it; correct?

A Correct.

Q It did not have any instructions that you were not to lift anything heavy; correct?

A Correct.
Q Okay. These doctors' notes you're talking about -- and I'll represent to you I have not seen those -- did those say that you were not to lift anything heavy?
A Yes.
Q Okay. Now, once you presented those to USC, were you given a full refund?
A I don't remember specifically what the refund was. But I was given some sort of refund.
Q You don't recall if you were given a full refund with some late fees waived and, in fact, the withdrawal -- the fact -- the record that you ever took that course or ever enrolled in that class was removed --
A Yes. I know that was --
Q -- from your transcript?
MS. ALBRECHT: Object to the form.
A -- removed. But I don't recall -- I wasn't ever really concerned with the financial aspect of it. I was more just not wanting that on my record.
Q (MR. GESSNER) Okay. And it's been a while since I've been in school. But if you got a WF, is that counted as failing the course; correct?
A Correct.

Q So that would go against your GPA?
A Yes.
Q Did you ever get a WF for that course?
A No.
Q You got a W; is that right?
A I believe so, yes.
Q Do you recall how that affects your GPA?
A I don't believe it does. I think it shows up on your transcript, but it doesn't actually affect your overall GPA.
Q But you wanted that removed from your transcript?
A Yes.
Q And the university did remove that from your transcript?
A I believe so.
Q Okay. What was wrong with your back?
A I had a pars fracture in the lower part of my back.
Q How did that happen?
A I'm not sure. However, I did experience a lot of my, like, back pain and stuff after coming back from Italy.
Q Okay.
A And I don't know whether that was, you know, due to the labor that I did there or stress or what have you. But they said that I had the pars fracture

and bulging discs in the lower part of my back.
Q What treatment have you received for the back injury?
A I went through physical therapy two or three times.
Q Anything else?
A Not that I can recall.
Q Were you given any pain medication?
A No. I was not given pain medication. I was given an anti-inflammatory for the swelling that was in my lower spine.
Q Did you have any issues with back pain prior to going to Italy?
A Not anything, you know, major. Like, normal if I sit too long. It's a problem. Nothing noteworthy or that limited any activities.
Q Did you have any back pain while you were in Italy?
A Yes.
Q Was that the same back pain that you're talking about in the fall of 2016?
A Yes.
Q Did it -- so you took this lithography course, and I'm guessing you started the course -- you attempted to take this course; correct?
A Yes, uh-huh.
Q Did you injure your back worse while taking the

course?
A It just kept aggravating it. The lifting and the being kind of like halfway bent over position was not really good for my lower back.
Q Okay. You talked about Jaime Misenheimer a little while ago.
A Uh-huh.
Q Did she ever file a complaint relating to you?
A She didn't file a complaint about me. She filed -- well, she tried to report, I believe, to the EOP office and to the department heads that David asked her to give me an intentionally low grade in the course. And I believe -- or was made aware of -- later that he made several threats to her as well. I'm not entirely sure to what extent. You'd have to ask her.
Q Okay.
A But I do know that there were reports of that made as well.
Q Did you ever talk with Jaime Misenheimer about everything you just mentioned?
A Which part of what I just mentioned?
Q All of it.
A Like the -- are you talking about like the stuff that happened in Italy?

Q Okay. Let's talk about -- did you ever talk with Jaime Misenheimer about this alleged incident where Professor Voros asked her to give you a bad grade?
A I didn't speak with her about that at that time. I didn't find out about that until later.
Q So you've never spoken to her about it?
A I have spoken with her about it. But it wasn't around the time that she was asked to give me the bad grade. It was prior to that semester -- or I mean after that semester.
Q Okay. What did she tell you about that incident?
A Just that she was asked to give me a bad grade and that she had reported it.
Q Okay. Did you ever take any courses with her?
A No.
Q So she never had an opportunity to give you a bad grade?
A No. But that was prior to me -- like, I -- before she was made a graduate instructor to where I could take the independent study class with her, I was in her class. I sat in on it for a couple of weeks to kind of figure out, you know, if I wanted to be in this course or if it would be helpful towards my degree. And in that time frame before I decided I didn't want to take it, that's when he had asked

her that.
Q Okay.
A And that's kind of all I know about that.
Q Did you discuss with Jaime Misenheimer anything else with respect to you?
A Not while I was in school.
Q Okay. What about after?
A After, we did have a few conversations. But there wasn't really, like, any exchange of information on my behalf. It was more just, "Hey, I heard about your lawsuit," and "I've done this and this in support." Or "I've, you know, also filed these complaints, and I wanted to let you know that I filed these complaints, or that, you know, this happened." But there was no really specifics exchanged.

People obviously had access on the Internet to the lawsuit and got information that way.
Q Okay. Did you contest the grade that Professor Voros gave you?
A I did.
Q Okay. What class was that relating to?
A To life drawing.
Q When did you take that class?
A In the spring of 2016. Which is another good

example of retaliatory action since the grade was put in during our time in Italy.

Q Okay. Do you know what date it was put in?

A No, I don't know specifically off the top of my head.

Q Well, what grade did you get in that class?

A I think I got a low B.

Q What grade do you think you deserved in that class?

A I think I deserved an A since the basis of him giving me the low grade was my lack of attendance when I never missed a class.

Q Okay. Do you know what USC's policy is with respect to challenging a grade that a professor gives you?

MS. ALBRECHT: Object to the form.

A I contacted the department, and all the department said they could do is talk to David about it. And if he wasn't willing to change it, then that's all that could be done. So I don't know if there's like a specific policy.

Q (MR. GESSNER) Do you know whether Professor Voros was able to explain why you got the grade you got?

A Yes. Again, that was because, according to Dr. Graciano, the reasoning behind the lower grade was because of my lack of attendance.

Q Nothing else?
A No.
Q Did you encounter any difficulties with your thesis committee?
A Yes.
Q Okay. Do you believe any of those difficulties were related to your EOP complaint?
A I don't know that they were specifically related to the EOP complaint, but I do believe that they were related to, like, the whole ordeal of, you know, me coming back from Italy and then hearing things about what did or didn't happen in Italy.

And, I guess, me filing the complaint in terms of whether I was, you know, a behavioral issue or uncooperative or what have you. They all kind of fueled that stigma or reputation around me that was false.

Q Okay. So when you present a thesis at the graduate level, though, isn't it normal to receive criticism from your committee?
A It's normal to receive criticism from your committee up until the point of your installation of your show. Like, if you show them stuff that you're working on, and they're like, you know, we don't like this. Make this change. Or consider

doing this for your actual presentation in the gallery.

But the issue that I had was that I had already installed the work, and it wasn't -- the changes that they had asked me to make they wanted me to make midway through the week. Granted, our shows are up for one week. So it would have been taking a show down that had already been up for half a week. People had already seen it.

And they wanted me to reprint all of the mug shots that I had used for my display, which would require more money, you know, more time going in there and taking everything off the walls, reinstalling after people had already seen it.

And it was kind of like an embarrassment thing because the show had already been up for a few days, and it's up for, like, a week. Like, less than a week.

Q How many mug shots were included in your exhibit?

A I believe like 24 or so. I don't know specifically. There were six different ones, and I just repeated them.

Q Did your thesis committee ask you to reprint all of them or only some of them?

A They asked me to either take down all of them and

reprint them to the same size or take down some of them and cut them.

(Defendants' Exhibit No. 7 marked for identification.)

Q (MR. GESSNER) Ms. Dunavant, you've been handed what I believe has been marked as Defendants' Exhibit 7. Can you tell me what that is?

A That's my thesis show.

Q Okay.

A After it was installed with the mug shots the original length that I intended them to be.

Q Okay. That's -- that was my first question as to whether or not this was before or after the reprint.

A So the top is before, and then the bottom appears to be after because the bottoms of the mug shots look like they're lined up.

Q Okay. So if I understood your thesis committee correctly, is what they said in the top picture -- and I think it's most noticeable on the left -- some of the mug shots are slightly smaller than the rest; is that correct?

A That's correct.

Q And their belief was that that was visually displeasing; correct?

A Correct.

Q And they thought it would look better if they were all the same size?
A Correct.
Q And you disagree with that?
A Yes.
Q Okay. How many of them did you reprint?
A I believe I reprinted all the ones that were smaller.
Q Right. Your committee didn't make you reprint each and every one of those mug shots; correct?
A That was their original idea was that I could reprint all of them and make them a more, like, uniform size.

And in trying to alleviate some of the work that I'd have to do -- because they were, like, nailed and then mounted into the walls, and I didn't want to have to go back in and kind of like patch over the holes and redo that -- I opted for, like, printing a few of them larger and trying to get it the same size, which required me going back into photo shop and resizing the image.

Because what I originally did was I upscaled all the mug shots straight from J. Ruben Detention Center's records by the same amount, and naturally, the one mug shot was a different size. So that's

kind of how it got that.
Q In the middle there's a couple of -- I don't know if I'd call them pillars or columns -- with some items on top. What is that?
A They are like file folders that represent statistics related to, like, cases of sexual assault.
Q Okay.
A Of like how many are, like, reported. How many go to, you know -- each step of, like, the law process.
Q Right. And so in the top photograph -- it will be the pillar or column that's closest to you, there's a large stack of --
A Uh-huh.
Q -- papers or files; right?
A Yeah.
Q What does that represent?
A That one was, like, the amount of cases that actually occur and are reported, and then how many actually go to -- you know, it just goes down the list.
And they did ask me to make that more clear, and that's something that I was completely willing to do because it was one of those changes that was,

like -- a small change. Like, just make this more clear versus the change that involved me pulling these things off the wall once the show is already installed. It was a lot more difficult and disruptive to the show that was already installed.

Q Okay. If I recall correctly, the issue that your committee had with that centerpiece with those pillars and the representative documents, is they thought that was really kind of the centerpiece of your own project; right?

A I don't know if they thought it was the centerpiece. It is in the center, though.

Q Okay. Granted. But they thought you should explain it a little better for the sort of uninitiated public; correct?

A Yes. They thought I should add labels to it, which I did agreeably.

Q Okay. So you weren't opposed with them making suggestions and changes to your exhibit generally?

A Small changes that clarified what I was already trying to say and do, no problem.

Q Okay. But you had a problem with having to reprint the mug shots which was more laborious and expensive for you to recreate; correct?

A Correct. And because it was a subjective concern.

They wanted it to look more like -- I don't know if you've ever seen Warhol's 27 most wanted men -- they wanted it to be more uniform like that, which is just, like, an esthetic, subjective concern. Whereas the change they asked me to make in the center of the piece was actually more related to effectiveness of what I was trying to say. So that's why I was totally willing to change it.

This definitely alters, you know, what the viewer is going to get from it. Whereas the other change was just kind of like a way for them to make me do extra work because they didn't agree with -- originally didn't agree with having the mug shot large. They all thought that I should do them very, very small initially.

Q Okay. How much did it cost for you to reprint those?

A The first time I printed them, it cost me like $200 because my lab fees wouldn't cover it. And then when I reprinted them, it cost me about $80.

Q Okay. You said the change to the mug shots was more subjective, but would you agree with me that art itself is subjective?

A Absolutely.

Q It's not like math where the answer is either right

or wrong.

A Yeah. And that was kind of my point with it. Since this is a subjective thing, esthetically and not something that alters, you know, the effectiveness or the purpose of my show. That it wasn't a necessary change midway through the one week that I got to have my show installed.

Q You had mentioned lab fees. What are lab fees?

A Lab fees are just -- usually you pay them towards a course, but you also have lab fees that you have for the specific area your concentration is in.

And so when I went to go use my student lab fees that I pay for independent study or for, like, my thesis class, I wasn't able to use them for printing because they said that my lab fees were already reallocated to painting, to that department, so I wasn't able to use them within the printing lab.

Q Okay. And, again, I went to law school. I think the closest thing we had was a printing allowance where we were able to print something like a thousand pages per year.

A Uh-huh.

Q And so if you went outside of that -- those thousand pages in the computer lab, you had to

start -- you had to get a card and start paying.
A Yeah.
Q Okay. So the lab fees -- what would you typically be able to use those for?
A Well, since mine went to the painting department, I would have been able to use them for the painting facilities in the painting classrooms and the materials and stuff that were in there.
But had I had them directed towards, like, the printing or to printmaking or something like that, I would have been able to use them towards the prints that I made.
Q Okay. I see. So why were the fees directed towards painting and not printing?
A Because I came in as a painting concentration.
Q Okay.
A And so, I guess, it was still like that on my -- I don't know -- some type of record or whatever that they had.
Q While you were a student at USC, did you have some sort of teaching assistant job every semester you were there?
A I had some sort of thing that provided a stipend.
Q Okay. So if I've done the math based on the records, and I said that during your time at USC

you received $26,066.67 in stipends, would that sound about right?
A I haven't done the math, so I wouldn't know. But I'm sure that's appropriate.
Q And did you receive $17,804.50 in tuition supplements?
A I don't know what the exact total is.
Q Okay. But you did receive money that reduced your tuition; correct?
A Correct.
Q And you did receive stipends; correct?
A Correct.
Q And that eased your financial burden of obtaining your degree; correct?
A Yes.
Q Okay. How did you pay for the rest of your degree? Was that student loans?
A Yeah, with student loans.
Q Okay. Can you say whether or not these stipends you received actually increased during your tenure at USC?
A I don't know.
Q Just going back through my notes, so we had talked about some recording you had made. We talked about you recorded Professor Voros, and he was not aware

he was being recorded to the best of your knowledge; correct?
A Correct.
Q And your conversation with Alex was recorded by your mother; correct?
A Correct.
Q But Alex didn't know that the phone line was open; correct?
A Correct.
Q And you said you recorded Dale Moore with his permission?
A Yes.
Q Okay. Did you also record Carl Wells?
A Yes. With his permission.
Q Okay. Did you record anyone else with respect to your time at USC or any of these complaints we've talked about?
A I don't believe so.
Q Okay. Prior to going to Italy, and I may have asked you this before, did you have any issues with any other professors?
A No. I had no issues whatsoever.
Q Okay. You've mentioned a couple of times here today about the relationship between David Voros and Alex Stasko. Why did you say that?

A Would you like me to tell you what I knew when I was in Italy, or what I learned prior to being in Italy?
Q What did you learn while you were in Italy? Or what did you know while you were in Italy?
A I believed that the two of them were having an intimate relationship. One reason because I've seen that on a few occasions. And also because when we were working or on, you know, trips and stuff, they would always be absent as well. So, I mean, that's kind of -- that's in my complaint as well.
Q Okay. I think your complaint mentions that you -- or I think you just said that you witnessed them doing -- what exactly did you witness?
A I just witnessed them being intimate together. I didn't really, you know, care about -- I was just like -- this is none of my business. Move on.
Q When you say "being intimate," that can have multiple meaning. So, if you could, please elaborate.
A I mean, I don't know specifically what was going on, and I don't really care to know what was going on or is going on. Because like I said, I was in Italy to -- I was there and I was, like, this is

not my business.
Q Okay. So you didn't see them engaged in any sort of sexual acts, did you?
A I'm not sure specifically.
Q You don't know if you did?
A I mean, that would require seeing the genitals, and I did not see those.
Q So what did you see?
A I saw them together intimately away from the rest of the group in a manner that's not conducive of a student-faculty relationship.
Q Did one of them have their arm around the other? I'm just trying to --
A I mean, I don't know --
Q -- nail down what you mean.
A -- specifically like -- I just remember seeing them together closely in a way, like I said, that's not really a normal type of --
Q Close in physical proximity?
A Yes.
Q Touching?
A Yes.
Q What kind of touching?
A Just together.
Q Well, it says in your complaint, Defendants'

Exhibit 1, page 5, paragraph 28 -- it says, "While at Voros' house for a meal, plaintiff walked in on Voros and AM," which is, in fact, Alex Stasko because she was Alex Stasko Miller; correct?

A Uh-huh.

Q Engaging -- "walked in on Voros and AM engaging in sexual acts."

A I don't necessarily agree with that's what it was because I can't specifically say what exactly was going on. I have my assumptions.

Q So that statement is inaccurate?

A I would say it's a little bit too specific for what I actually saw. Because if you're asking me to describe actual actions, I'm not going to be able to do that for you.

Q Okay.

A Nor do I want to.

Q The next paragraph says, "Voros would make statements to plaintiff which implied he wanted to engage in sexual acts with her as well."

Is that an accurate statement?

A I think that that's also a little specific. He was and would make flirty comments such as, like, "I don't how you still look that pretty after working hard all day," or get, like, very close or, like,

touch. But, again, I think that's a little specific.
Q So he never stated that he wanted to engage in any sexual act with you?
A No.
Q Did he imply that he wanted to engage in sexual acts with you?
A No.
Q Also says, "Voros indicated that if plaintiff would engage in sexual acts with him, plaintiff would be able to go on shopping trips in Italy like AM," Alex Stasko.
A He made some comments that if I was more like Alex, I wouldn't have to do the type of work that the guys were doing. Because they often -- him and Alex would go and do separate things during the day that didn't require the manual labor. Like when we were in Rome, they went on a shopping trip. I mean, I don't know what else they did, but she came back with new clothes.
Q Well, they went to IKEA to get supplies for ICA; correct?
A Yes. And that was separate.
Q Okay. But saying, you know, "if you were more like Alex," that's ambiguous.

A Correct, it is. As is most of his language.
Q But he never stated specifically that if you engaged in sexual acts with him you would be able to go on shopping trips in Italy?
A Correct.
Q While these statements were made, was anyone else present?
A Cody and Antonio were present.
Q Okay. On the next page, page 6, first paragraph, No. 30, "Voros would host dinners late into the night in which he would place his hands on plaintiff's face and legs sexually."
What does that mean?
A As I just stated to you, he would make, like, weirdly flirty comments that made me uncomfortable and would sit really close at dinner after drinking and stuff like that, that I was clearly, like, uncomfortable with.
And Cody actually several times overheard some of the things, and was like, "What is he saying? What is going on?"
Q Now, part of your lawsuit, you allege some sexual harassment, do you not?
A I do. But I do believe that since -- if we're going on, like, very specific, I can't say

specifically, you know, like what -- it's just my assumption of, like, this is what's going on.

So if you're looking for, like, specifics, then, no, I don't know specifically.

Q You don't know specifically whether or not you were sexually harassed by David Voros?

A I think that I was harassed and I think that the treatment made me uncomfortable, and so that can be considered harassment.

Q Okay. In your EOP complaint and your EOP appeal, did you ever state that you were sexually harassed by David Voros?

MS. ALBRECHT: Object to the form.

A No.

Q (MR. GESSNER) Okay. And, in fact, you told Dale Moore that there was no sexual harassment in Italy; correct?

MS. ALBRECHT: Object to the form.

A Correct. Because my concern was with being left on the side of the road.

Q (MR. GESSNER) Right. That's what your complaint was about; right?

A That's what I was concerned -- that's -- my primary concern with, like, most of this besides, you know, how USC handled this when I got back -- my primary

concern was my own personal safety which was affected when I was left on the side of the road and when I didn't have a place where I could have a secure meal or be able to leave my room. And I believe that is definitely harassment.

Q Okay. And that's kind of what I'm getting at. There's a difference between having a dispute with a professor and being upset that he's, according to you, left you on the side of the road and he's yelling at you.

A Absolutely.

Q You're getting chewed out for your behavior; correct?

A Yes. For behavior that wasn't even poor behavior, but, yes.

Q Nevertheless, you're getting chewed out. But there's a difference between getting chewed out -- and you say you didn't deserve it; correct?

A Correct.

Q There's a difference between that and being sexually harassed?

A Correct.

Q There's a difference between getting chewed out and gender discrimination; correct?

A Not necessarily.

Q Why is that?
A Because the way that I was chewed out was specifically directed at me for my inability to do work that did not -- besides moving furniture -- differentiate from the work that the guys were doing.
Q Okay.
A And I also think that theres a difference between being chewed out and just harassment in general. Being yelled at for not doing something is different than being yelled at and left on the side of the road in a foreign country where you don't speak the language.
Q And that's what you were complaining about in your EOP complaint; correct?
A Correct.
Q You did not think that was appropriate behavior for a USC professor; correct?
A Correct.
Q Go to page 10 of your complaint. I'm sorry. I keep calling it complaint. It's technically the amended complaint.
Page 10, paragraph 50, it says, "Voros kept plaintiff in her room."
Were you physically restrained in that room?

A I was not physically restrained, but I was told that I had to stay in there, and that I couldn't have my meals at the house or anything like that because he had threatened several times to call the police to have me physically removed.

I learned later that he said that he should have had me arrested like Amanda Knox. I saw that in an email. But there was definitely reason for me to be scared and to be concerned and to feel like if I left that room that I was going to be put in some kind harm. Whether that was going to an Italian jail or being removed to who knows where, I don't know.

Q Okay. But I think you had testified earlier that you did, in fact, leave your room and walk around the village; correct?

A I did when they were at his house for lunch because I knew that there wasn't anyone in that building, so I could leave.

Q Okay. Further down that page, paragraph 52, you state -- you're talking about horrible conditions of the ICA, and you're informing USC about the inedible food.

What food was inedible?

A So the food that I was brought when I was stuck in

the room that I had was, like, disgusting, like, hard, nasty -- I don't even know what it was half the time. But Cody would bring me, I guess, leftovers of what they had. And so that was kind of all I had to eat was when he brought me the breakfast leftovers or whatever.

Q Okay.

A And I believe there's, like, a photo of that somewhere.

Q That -- there's a picture of a plate of pasta with some sausage, and it looks like a whole sausage included with that. Is that what you're talking about?

A Yeah. And it was a brick. You couldn't chew it.

Q Well, was it a hard sausage, or was it --

A I don't believe it was intended to be that hard.

Q Okay. Didn't you tell your mother that you thought it was?

A I don't remember.

Q Okay.

A But it wasn't. Maybe.

Q But you did eat the pasta; correct?

A Right.

Q And there's also a picture of some bread and egg and some cheese, and I think that there was some

meat with that, probably soppressata. Does that sound about right?
A Sure.
Q Okay. And did you eat that?
A Yes.
Q Okay. So you're not referring to the food that you had been eating the entire time?
A No.
Q Okay. How was the food?
A It was a lot of seafood. It was not my particular preference. But, you know, protein.
Q You don't care for seafood?
A Not the kind that looks like it did before it died, no.
Q But that's just kind of the Italian diet, isn't it?
A Yeah.
Q I grew up in an area with a heavy concentration of Italian-Americans, and what they perceive as Italian and what my actual roommate in college would eat and --
A Totally different.
Q Very different. And you're right. There's a lot of seafood.
But prior to the whole trip to Rome and your coming back, did you have any complaints about the

food?
A Not particularly. I mean, it wasn't -- I made a few statements I'm sure that, you know, seafood was not my preference. But I didn't have any, like, actual complaints of being hungry or anything.
Q And there weren't any safety concerns as far as the food was concerned; right?
A No.
Q Okay. In that same paragraph, you also mentioned rodents. Were there rodents in the ICA facilities?
A There was all kinds of different creatures up in there, most notably the scorpions and spiders, but there was other, you know --
Q Okay. Because previously, I had heard about the scorpions, the spiders, and the cats, but that was the first I had seen a mention of rodents.
A Yeah, there was a few. Not quite as prevalent as the insects.
Q Okay.
A I think one of the most alarming things was actually the cat spray and feces that were all over the building. That was pretty gross.
Q Yeah. You were talking about the spiders earlier. How many scorpions do you think you saw while you were there?

A Several. We were -- one of the duties that we had for our, like, cleaning up or setting up or what have you was to take the cushions off of the couches and stuff that were in there and pull off the, like, slipcovers because they were covered in cat spray. It smelled like cat urine. And in doing that, there was, you know, several scorpions and stuff inside the cushions that had hidden themselves in the couch and stuff as well as, you know, in the different, like, dark corners of that basement that we were painting.

Q Okay. Did you have any concerns with the fact that there were scorpions there?

A I mean, I had some concerns because it's not like something that we're used to here, you know, with them being everywhere. And that wasn't a concern when we were in, like, Rome, for example. You didn't see that running around.

Q Right.

A But I think it had a lot to do with the fact that the building was uninhabited for quite some time prior to our stay.

Q Okay. We do have scorpions here.

A Oh, I'm sure we do. I know we do in, like, New Mexico.

MS. ALBRECHT: Jay had one in his bathroom not too long ago.

MR. GESSNER: They're much more prevalent in Chapin for some reason. I haven't figured out exactly where the dividing line is. I was a little surprised to hear that at first.

Q (MR. GESSNER) On the next page, page 11, paragraph 56, you allege that Dr. Miller subsequently lied to Magdalena in saying plaintiff told him she was fine.

Do you agree or disagree with that statement?

A Agree.

Q Okay. But you told Dr. Miller that technically you were safe.

A I did. But, again, that was very clearly perceived as -- not even -- I wouldn't even say -- I said sarcasm earlier. But I wouldn't even say that it was sarcasm. I think it was just me trying to figure out what his definition of "safe" was. And my definition of safe -- my point was in saying what I said was that our definitions of safe clearly weren't in line. And by my definition of safe, I was not safe.

And I made sure after the phone call -- because he kept doing this thing where he was like,

"So you're safe? So you're safe? So you're safe?" -- repeatedly, and I think that kind of led to my one comment that I made.

And I wanted to make sure that it was beyond, without a doubt, clear that I did not feel safe, which is why I messaged Magdalena and reiterated it, which I believe is in one of those other exhibits that you handed me.

And David later did the same thing when I met with him and tried to get me to say out loud that I was safe when I was like, "No, I do not feel safe." He's like, "Tell your mom you're safe," because USC had contacted him at that point.

Q Okay. You said you reiterated -- was that in your message to Magdalena?

A Yeah.

Q That you did not feel safe?

A That I was not safe.

Q And was that the point then when USC brought you home?

A It looks like the point around when they started kind of trying to arrange that. And David found out about that arrangement prior to me finding out.

Q Did USC ever ask you or your family to reimburse them for the cost of bringing you home from Italy?

A No.
Q You had a return flight that you had originally paid for; correct?
A Correct.
Q Whatever happened with that?
A I'm not sure. Whatever happens with flights that you miss. I don't know.
Q I mean, you haven't inquired about getting a refund or a ticket for another flight or anything like that?
A No. I honestly wasn't concerned with that at all at the time. I was just glad to be home.
Q Okay. You had said earlier when we were discussing Professor Voros and Alex Stasko about what you understood while you were in Italy and then when you came back from Italy.

What did you understand about their relationship when you came back from Italy?
A That there was a relationship going on there outside of just a normal colleague relationship. It's also my understanding that he went above the department chair to get her hired as an adjunct.

I heard from Pam Bowers some things also about their relationship that I didn't know prior to being in Italy.

Q Okay. Did you hear any of that from Professor Voros?
A No. In fact, there was a no-contact order.
Q And you haven't spoken with Professor Voros since you were in Italy; correct?
A Correct.
Q Okay. What about Alex Stasko? Have you had any conversations with her since you left Italy?
A Absolutely not.
Q Okay. So anything you know about their relationship you would have heard from third parties?
A Correct.
Q On page 20 of your amended complaint, paragraph 113, the last sentence of that paragraph is where you were talking about your thesis committee and your art project.

You say, "No graduate MFA student has ever had to take down their show after installation.

How do you know that?
A In my time there, there was never a student that had to take down their installation. We also had access to past students' MFA thesis that we could look at, and usually like they did in mine they made me write a section about what happened during

installation, what happened after installation. And what I had read through, there has never been anyone else that had to do that with their thesis presentation.

Q Okay. But you didn't read every single thesis?

A I read all of the most recent ones.

Q Okay.

A If it does happen, it's incredibly rare. Because like I said, the show is up for like a Saturday to a Friday evening. It's very, like, immediate.

Q Going forward and -- because I represent USC and President Pastides, I'm only going to address the causes of action against them. So if you go to page 25. That's your fifth cause of action as against Professor Voros and the University of South Carolina.

You allege a cause of action for defamation; is that correct?

A Correct.

Q Okay. In paragraph 149, you allege that USC, through its employees and representative and Professor Voros, "accused plaintiff of having exaggerated about the problems she experienced in Italy, having behavior problems, and being unfit in her professional field."

Who said that?

A Well, there was the BIT report that kind of suggested I was a behavior problem. And then in David's statement to the EOP that was addressed to Dr. Allen Miller, it said that I had a mental breakdown in Italy.

And then my treatment when I came back was vastly different from professors -- was vastly different than when I had -- before I left for Italy. Like, I kind of got avoided by professors and kind of treated like a pariah in the department.

Q Okay.

A Like people walked on, like, eggshells around me because they thought I was, like, mentally unstable or something.

Q Paragraph 152 says, "Such statements were false, known to be false, and maliciously published." How were those statements published?

A Which statements in particular?

Q The ones you just said. the BIT report and Professor Voros' response --

A I mean, they were contributed -- not contributed. They were, like, the department saw those. Like the director -- like Andrew Graciano and Chametzky

saw those reports. And I'm sure that people were talking about it within the department, too, because I had faculty members, like Jaime Misenheimer and Pam Bowers, specifically come up to me and try to ask me about things that were in Italy, which forced me to go try and talk to Chametzky and like, "Hey, I don't want to be bothered about this."

But it just became this kind of air of like -- around me of, like, people were walking on eggshells and kind of treated me like I was the problem because I stepped up and said something.

Q Do you have any personal knowledge as to the -- this BIT report you're talking about or any of the documents specific to EOP being given to anyone outside of the individuals that were handling your complaint?

A I believe that they were shown to Graciano and Chametzky. I believe they were shown to -- therefore, the department.

Q Okay. What makes you think that?

A Because they were referenced in emails. And I believe that they were cc'd on some of the emails.

Q But you don't know the extent of the information they received?

A No, I don't know the extent. But I also later saw emails from Graciano saying that I was a behavioral issue -- not specifically in that word, saying I was a behavior issue, but referencing my behavior.
Q Okay.
A As being unfit.
Q But you don't know what the basis was for that comment, do you?
A I don't know specifically off the top of my head.
Q Okay. Next page, 26, your sixth cause of action for fraud. You say that Professor Voros on behalf of USC represented to you that if you went to Italy you would be attending a USC sanctioned trip.

Did Professor Voros ever say that specifically?

A Specifically in those words, no. But he did mention that we would be there, like, as part of a USC group or with the USC students because originally when we were given the option to go before the USC group or during the same time that they were there.

And, again, like I said before, like, this, you know, opportunity was mentioned to us in class during class time, on campus, after class time.

There was emails back and forth within the

department. So the department was aware of the trip, and we were trying to get credit to go -- you know, get class credit. So I did believe that it was a USC trip and that I was going there as a student and him being my professor.

Q Okay.

A And I believe at the time that the ICA had some kind of Memorandum of Understanding or agreement or whatever the proper term is called with the ICA between USC and the ICA. So it kind of, in my mind, made sense that it was a USC trip since USC already had that agreement with the ICA. And we, you know, discussed all of this at school through school email with the department.

All of that kind of led to the idea of it being a USC trip whether the word "sanctioned" came out of David's mouth or not.

Q Okay. You mentioned an MOU. It's a Memorandum of Understanding. Is it your belief that there was no written agreement between ICA and the University of South Carolina?

A There was a PowerPoint presentation that has since been removed that was on USC's website talking about the MOU, and they also advertised for the ICA within, like, the department and in their life

study abroad stuff that's no longer online either.
Q Okay. But how do you know whether there was or was not a written agreement between ICA and the University of South Carolina?
A All I know is that there --
MS. ALBRECHT: Object to the form.
A -- was the Memorandum of Understanding or whatever it was.
Q (MR. GESSNER) Okay.
A Advertising for it on USC's website.
Q But you've never seen it?
A Seen what?
Q The MOU.
A I've just seen the PowerPoint document that talks about the MOU.
Q Okay. On page 27, your seventh cause of action is for negligent misrepresentation. You say, "The defendants made a material representation to plaintiff that the ICA had an MOU with USC and that the three-week trip to Italy was a USC sanctioned trip."
We talked about the USC sanctioned part and the MOU. But no one ever specifically told you that there was or was not an MOU?
A No.

Q Next page, page 28, is your eighth cause of action for negligent supervision. You allege in paragraph 178 that "defendant was grossly negligent in supervising Voros." You go on to say in paragraph 179 that "defendant had reason to know Voros required excessive supervision given his past conduct which included being visibly intoxicated, threatening other employees, and his history or" -- I think it's supposed to say "of" -- "violence."

What do you know about any of that?

A I know that there have been other complaints filed against David. I know that there's other lawsuits against David. I know that there's police reports and reports even from current grad students about his behavior.

I think there's, you know, quite a few things. I don't know specifically the detail because I've never cared to know more than just a general idea. But I am quite aware that there's other, again, complaints, lawsuits, reports of all different kinds.

Q How do you know that?

A Because a lot of it is public information.

Q Okay. So you went and researched this yourself?

A Yes. And I had other students say things too.

Q Okay. Other than other students telling you things, what did you find from your own research?
A A police report, some complaints from other graduate students. I knew that there were complaints within the department. I didn't know who specifically complained or what entirely they entailed, but it had been mentioned to me from some other faculty and from Chametzky as well that there were other complaints.
Q Okay. Do you know when those complaints were filed?
A No, I don't. You'd have to ask them that.
Q Okay. Are you aware of any complaint regarding Professor Voros or any lawsuit regarding Professor Voros being filed prior to your trip to Italy?
MS. ALBRECHT: Object to the form.
A A lawsuit? No. But I believe that there was complaints prior to mine.
Q (MR. GESSNER) You believe. Do you know?
A No, I don't specifically know.
Q Okay. Why do you believe that there were complaints prior to your trip --
A Because --
Q -- to Italy?
A -- some students after I got back -- the

students -- the grad students and undergrad students were very supportive of me, like, where the faculty kind of treated me like I was difficult or whatever, you know, it was being discussed about me.

But grad students and other students come forward telling me that there was already existing complaints or like, "These are the issues I had with Professor Voros," et cetera, et cetera.

At that time, like I said before, I kind of just wanted to -- like after the EOP kind of dismissed my complaint, I was in that mindset of where I just needed to get through this program and get out of here. So I kind of, like, pushed all of that out, so I never really inquired as to the depth of the complaints.

Q On page 29 is your ninth cause of action, "gross negligence in handling investigation." And we've already talked about that some regarding your -- the EOP investigation and the EOP appeal.

Is there anything else regarding that that you think was grossly negligent?

A I mean, kind of just what we have been talking about is what's coming to my mind. Like the EOP -- the department not accommodating me even after

being asked to by the EOP to help me rearrange my schedule. I felt like I very much did that on my own. I remember when I worked with Graciano when I came back that I kind of had to find my own assistantship, and I was, you know, trying to figure out all of my classes myself. The university didn't really do that for me or didn't really help out following the complaint.

And, again, I think that the appeal wasn't done correctly. I don't think that there ever was, you know, a proper investigation with that. I know that the EOP investigation wasn't done correctly, and the procedures weren't followed there.

Q Page 30 is your tenth cause of action where you allege a violation of Title IX, "the school's deliberate indifference to alleged sexual harassment."

But as we've discussed here today, you never alleged sexual harassment?

A I just alleged harassment primarily was my allege for harassment.

Q But not sexual harassment?

MS. ALBRECHT: Object to the form.

A No.

Q (MR. GESSNER) To the extent it says that in your

complaint, that's inaccurate?
A Yes.
Q Where it says in paragraph 191 "sex based harassment articulated in plaintiff's general allegations" -- we've already said that that's not accurate.
MS. ALBRECHT: Object to the form.
A Yes.
Q (MR. GESSNER) You stated that you were "deprived of access to educational opportunities or benefits."
What opportunities or benefits?
A I believe we discussed some of this earlier with my lack of ability to teach classes and to assist in studio art, as my peers did, which deprived me some of the teaching experience that I would have had otherwise.
I also wasn't able to get a concentration in painting, which is what I went to school for, what I paid money to go to school for. And because the department is a man and his wife, you know, having an issue with one of them kind of, you know, disabled me from being able to complete my degree comfortably with the concentration that I intended.
Q You did teach studio classes. Just not as much as

you think you should have been able to do?
A I didn't get to TA for studio art until my third year. I had always TA'd for art history or the assistantships like the Center for Teaching Excellence or the Young Artists Workshop -- ones that I found for myself because the department wasn't able to accommodate or unwilling to accommodate me following my complaint.
There's many students that have been Instructor of Record since their first year at USC. I only got one year of being Instructor of Record which grossly limits your, you know, portfolio of student work that you have to present to universities when you go to apply for positions.
Q On page 31 at the very bottom is your eleventh cause of action for violation of Title IX, retaliation. And we've already talked about what you allege to be the retaliatory conduct; correct?
A Correct. But I'd also like to add that when I came back and I had to talk to Dr. Chametzky about it, Pam Bowers tried to contact me on several occasions and asked me to meet with her outside of school and outside of, like, the premises of school because she was worried for her safety if David overheard the conversations. So she asked me several times.

And then I had -- I don't remember who it was that texted me, telling me that, you know, Pam was trying to meet up with me. And I had faculty members asking me for what happened in Italy.

And I had to talk to Dr. Chametzky to kind of make sure he told the faculty that I didn't want them coming up to me regularly and asking me, you know, details about the complaint, Italy, whatever. Like I just wanted to be left alone.

Q Did you ever meet with Pam Bowers?

A No.

Q Paragraph 201, you say, "Fellow students and faculty harassed plaintiff."

With respective to faculty, is that what you had just said? that faculty members were asking you what happened in Italy?

A Yeah. And I had students do the same as well.

Q Okay. So were they intentionally harassing you, or were they just curious to know what was going on and --

A I think it was kind of like a mixture of being curious of what's going on. But I still think it classifies as harassment because I think the university -- because they didn't handle my complaint correctly, didn't ever give validity to

my complaint, and so students were kind of curious as to whether I was mentally unstable and telling this elaborate lie or whether there was truth to it.

So it can definitely come across as harassment in terms of being, like, a negative thing as well as a curiosity thing from my perception.

Q On page 32 at the bottom is your twelfth cause of action. It's called "promissory estoppel," and you may not know what that means, and that's fair.

But in paragraph 207, you say, "USC made an unambiguous promise to accommodate plaintiff while she completed her degree." We've already talked about those accommodations and --

A That they were nonexistent, yes.

Q Right. You've already described that; correct?

A Uh-huh, yes.

Q But you did receive your degree; correct?

A I did receive my degree, yes. Just not the degree that I wanted or intended when I went to the University of South Carolina.

Q Because you do not get the concentration in painting; correct?

A Correct.

Q On the next page, 33, your thirteenth cause of

action. This one is against President Pastides. You say that "you were subjected to a violation of your personal security, bodily integrity, and equal protection of the laws."

Do you -- is that what you are alleging in this lawsuit?

A Yes.

Q Okay. How was your personal security compromised?

A Because I didn't feel comfortable even being in the building where I was getting my degree. Besides saying that there's a no-contact order, there was nothing else done to protect my education and my well-being during the program.

Q Okay. Was that the same for your bodily integrity?

A Yes.

Q Okay.

A And also because of the trip that I was on, they, like -- that was a complete situation where I was not safe at all, and there was definitely USC involvement within that trip whether it was a sanction or not a sanction.

Q Equal protection of the laws. Does that phrase have any meaning to you?

A No, I'm not entirely sure what is meant by that.

Q That's a legal term, so I think that's fair.

But we had talked previously about gender discrimination. And, again, that just goes back to you -- you believe you were treated differently than Cody and Antonio; correct?

A Yes. And Alex as well.

Q Okay. But Alex is a female, is she not?

A Yes. But she's a female that's having a relationship with the person that's treating me differently.

Q Okay. While y'all were in Italy, was Alex a student?

A She was not a student. But I'm not sure what her relationship was to USC or otherwise. I know that she was -- when she came back from Italy, she was an adjunct, so I don't know if she had already been an adjunct while we were in Italy or if there was already that agreement.

Q So is it fair to say you don't know what her agreement was with ICA or Professor Voros or anyone else while you were in Italy?

A Yeah. I don't know.

MS. ALBRECHT: Object to the form.

A Yes.

Q (MR. GESSNER) On page 34 is your fourteenth cause of action against President Pastides. You invoke a

law or statute -- it's 42 USC Section 1985. And specifically paragraph 221, you allege that "Defendant Pastides and others met at various times and places, schemed, conspired, and planed in secret to damage plaintiff's career opportunities, interfere with plaintiff's harassment investigation."

Do you believe that?

A Yes.

Q Okay. You think President Pastides met with others and developed a scheme solely for the purpose of damaging your career opportunities?

A Yes.

Q What makes you think that?

A Based on emails that I've seen. And I'm sure you have access to them.

I definitely believe that there was some kind of, like, conspiring going on even with the letter that should have gone to the EOP that was addressed towards Allen Miller, who was in my complaint, and then again cc'd on the emails for the EOP.

And Pastides had been in Italy, and him and David are friends. I believe there's definitely -- and same with Allen Miller. They're friends as well.

I believe that there was a lot of communicating that went on there to kind of make it more difficult for me to complain or get any further with my complaint.

Q Okay. While you were in Italy and right after you came back, do you know what Allen Miller's position was?

A I thought he was like provost of student affairs or something like that.

Q Okay. So would it have been improper for him to have been involved in your EOP complaint?

A Yes. Because he was named in the complaint.

Q Was you complaint against him?

A I'm not sure specifically if it says that it was against him. But he was named in it, so I would assume that, in some ways, it was against him.

Q Is it fair to say that he was mentioned because you had contact with him and his name came up?

A He was mentioned --

MS. ALBRECHT: Object to you form.

A -- because when I tried to say that I was not safe and did not feel safe, he kept overtalking me and kept saying, "But you're safe. But you're safe. But you're safe," and also had contact with David as well. So he was named -- you know, mentioned in

that complaint as being part of the issue with me getting out of Italy.

Q (MR. GESSNER) Okay. But he was part of you coming home early; is that correct?

A I believe he was initially. I know other people got involved after. Someone else, I believe, organized the flight home. I don't remember the specific name of the person, but I don't think he's the one that actually organized that.

Q Other than the emails you mentioned, do you have any other evidence regarding a conspiracy between Harris Pastides and others?

A I can't think of anything else at this time.

Q Okay.

MS. ALBRECHT: You okay to take a quick break?

MR. GESSNER: Yeah. I'm sorry.

(Off the record at 3:09 p.m.)

(Back on the record at 3:28 p.m.)

Q (MR. GESSNER) Ms. Dunavant, do you suffer from migraines?

A Yes.

Q Is that something you've seen a doctor about?

A I have.

Q Do you take any special medication for that?

A I used to take seizure medication, but my insurance stopped covering it.
Q Okay. But that medication was not for seizures but to control or help with migraines; correct?
A It was used for preventative for the migraines, yes.
Q Okay. Are you epileptic?
A Yes.
Q Okay. You've been diagnosed epileptic?
A Yes.
Q Do you know -- or what doctor -- do you see a physician regarding your epilepsy?
A Back home in North Myrtle Beach I was seeing a neurologist. Yeah.
Q Okay. What's the neurologist's name?
A Originally it was Dr. Alex Benjamin, and then it was another doctor after that.

I haven't had an actual seizure since I was younger. I just have the migraines is kind of like the offset of the seizures that I used to have.

Q Okay. Now, in the course of discovery, your attorney has given us a number of documents some of which have a lot notes written in pencil, and I think that was your mother writing notes.

Does that sound familiar?

A That does, yes.
Q Okay. And in one of those in the margins, it's written "not epileptic."
Why would your mother write that?
A Because I haven't had seizures in, like, quite some time since I was younger.
Q Okay.
A Okay. They believe the migraines are the only things left. Because, obviously, I have my driver's license and stuff. And if you don't have the seizures regularly ...
Q Correct. That's my understanding. Okay. So you've stopped taking this seizure medication because insurance would not cover it; correct?
A Correct.
Q When did you stop taking it?
A Probably this past spring.
Q Okay. So that's a medication you were taking while you were in Italy; correct?
A Yes.
Q Okay. On the day y'all left for Rome, were you sick that morning?
A Yeah. I had a headache.
Q Okay. Did you have a headache, or did you have a migraine?

A I'm not sure specifically. I call everything headaches, but it was probably a mild migraine.
Q Okay. Both my mother and my wife suffer from migraines. Sometimes you get people that will say, "Oh, I have a migraine."
A And it's not actually a migraine.
Q Yeah. If you did, you wouldn't be here.
A Yeah. That morning I had the migraine, I actually, like, tried to stay in bed a little bit longer than I normally would when I was there working.
Q Okay. Did you have to take any additional medication because of your migraine that day?
A I didn't have any, like, additional medication to take. I believe Antonio or Cody gave me that, like, Goody's powder stuff, which didn't really help my migraine at all.
Q Okay. Do you know if anything in particular triggered that migraine?
A Sometimes, like, different foods will. Stuff with, like, nitrates in it triggers migraines. Sometimes they're just -- I get them in, like, clusters where I'll have them, you know, a few times for like a span of, like, a week or two. I don't consistently have them, but I'm not sure specifically.
Q Okay. Does red wine give you a headache?

A Sometimes, yes.
Q Okay. Did you have a lot of wine the evening before?
A I didn't have a lot of wine, but I did have some wine, yes.
Q Okay. How much is "some"?
A Like a couple of glasses.
Q Okay. So when you say "a couple," do you mean roughly two?
A Yes.
Q Okay. So from what you're telling me, you were not hung over that morning?
A No.
Q Prior to that, did you have any other instances in Italy where you had a headache and weren't able to work or help out?
A No.
Q I saw in some emails a mention of a grant for a CCA conference. Does that sound familiar?
A Yes.
Q What is that?
A The CCA is the College Art Association conference that's held annually.
Q Okay.
A I got a travel grant to go the spring before I

graduated, so the spring of 2018. I was awarded a travel grant.

I was also president of our graduate art club for that year, and so I got us funding to go to that conference, me and a few other grad students.

Q Okay. Where was the conference?

A In LA.

Q Did that grant cover the flight and the accommodations?

A The grant covered part of my flight, and it covered my pass into the conference. And then the university through, like, our graduate club funding request covered our accommodations.

Q Okay. So did you have to pay anything out-of-pocket for that?

A Yeah. I paid part of my flight, and then I paid for, you know, food and stuff and travel while I was in LA.

Q I don't need to make this an exhibit necessarily. But like I said before, I got a ton of documents without any sort of context whatsoever.

So this appears to be a photograph of your right ear.

A Yeah. It was really badly infected. I went to the doctor when I got back from Italy, and I had a bad

ear infection. And I was having some stomach problems too when I got back, I think, from like -- the water there I know has a lot of calcium in it.

But the conditions that we were sleeping in and the reason that photo is shown is because of, like, the damp kind of, like, basements we were working in. And the environment I think caused the ear infection.

Q So you think you received this -- hang on. Let me make it an exhibit.

(Defendants' Exhibit No. 8 marked for identification.)

Let me hand you what's been marked as Exhibit 8. And you've already identified that. That is a photograph of your right ear; correct?

A Yes.

Q And you said you got an ear infection while you were in Italy; correct?

A Yes.

Q Okay. So you saw a doctor about that?

A Yes.

Q Okay. And what did the doctor say about it?

A That it was an ear infection.

Q Okay. And how did you treat it?

A I had to take antibiotics.

Q Okay. And it went away?

A Uh-huh.
MS. ALBRECHT: Is that a yes?
THE DEPONENT: Yes. Sorry.
Q (MR. GESSNER) Any further complications?
A No.
(Defendants' Exhibit No. 9 marked for identification.)
Q (MR. GESSNER) You've been handed what's been marked as Defendants' Exhibit 9.
Have you ever seen that document before?
A Yes.
Q What is that?
A The OCR receiving my complaint that I filed after the EOP determined that they wouldn't do anything and then the appeal process also determined that there weren't any findings as well.
Q Okay. Now, so you filed a complaint with the United State's Department of Education; correct?
A Correct.
Q Now, of all the documents I've reviewed in this case, this is the only document -- this one single page -- that I've seen from the United States Department of Education.
Do you have any other documents about this?
A I don't -- I think that there was a document where they found that there wasn't -- like they something

with their determination. I'm not entirely sure where that document is at.

Q Okay. Do you know if you still have a copy?

A I'm sure that there's one somewhere.

Q Okay. Can you do me a huge favor and take a look to see if you have it?

A Yeah, absolutely.

Q If you do, give it to your attorney. The other thing I can do is send them a subpoena and see what they have.

Okay. Here's another. This might be my last exhibit, I think.

(Defendants' Exhibit No. 10 marked for identification.)

I'll represent to you that this is a copy of the Facebook messaging between you and Eileen Dunavant, who is your mother; correct?

A That is correct.

Q Okay. Now, I will represent to you that I had -- the way that these documents open when you click on them is in an Internet browser window.

A Uh-huh.

Q And if you just click print, it will cut off whatever is in between pages. You actually miss that part of the message. And so what I did was I copied/pasted into a Word document so that parts of

the messages were not cut off.

The downside there is that images did not make it in copy/paste. So I did alter this document somewhat. The substance of it was untouched. I didn't change anything in here, but I did -- I copied/pasted into Word, and I also added page numbers just for our own ease of reference.

While you were in Italy, did you converse with your mother by Facebook Messenger?

A Yes.

Q Okay. You did quite a bit, in fact; right?

A Yes.

Q At times was that the most reliable way to communicate with your mother?

A Yes. It was really hard to get service in the ICA building.

Q Okay.

A Which I think I messaged in my -- or talked about in my messages with Magdalena that service was hard to come by.

Q Okay. And I'll also represent that I did not include the entirety of all the Facebook messages with your mother if they weren't relevant to your lawsuit here. So I included from May 4, 2016, until May 17, 2016.

Basically it starts with you saying --

A In opposite order.

Q Correct. It's in reverse chronological order. So on page 45 at the end, you'll see it starts with you saying, "I'm in Rome trying to find a bus," and it ends with you basically telling your mom that you got through security and you're getting on the plane to head home.

A Yes.

Q Okay. Just a couple of questions about it. Because you talk -- we've talked today and you mention in your complaint about the conditions at the ICA facilities.

Did you complain about them to your mother before the trip to Italy?

A Did I complain about the conditions in Italy before I got to Italy?

Q I'm sorry. Before you went to Rome. I'm sorry.

A I'm not sure. I believe it looks like I sent her a photo of my room there. But I don't think that I did.

Q Okay.

A I don't know. I'd have to look through it.

Q So is it fair to say, though, that you didn't complain about your room or the living conditions

until you had the altercation with Professor Voros on the side of the road?

A Yes.

Q Okay. Directing your attention to page 41, when you arrived in Italy, it turns out you had some sort of issue with a professor from the spring semester; is that correct?

A Yeah. I was taking -- well, I wasn't taking her class. I was her graduate assistant for the class, and I had already mentioned the trip to Italy with her and that I would be having to leave a little bit early prior to the end of her class date. So I wouldn't be able to grade my half of the finals because there is another TA as well. And she was okay with it.

But then I guess she came across at some point when I was already in Italy -- she ran into Graciano on campus and said something about having to grade all of the finals, not even negatively towards me, but she said that I was in Italy so I wasn't able to and then the other TA was somewhere else.

And so I got an email from Graciano about not fulfilling my duties even though we had already spoken about it.

Q Okay.
A And I remember I emailed her and was, like, I had no intentions of not fulfilling the obligations. I thought we had already, you know, discussed this and made it clear.
Q So before you left for Italy, you cleared it with your professor that you were going to miss the final exam; right?
A Yes, I did. Uh-huh.
Q And while you're in Italy, you receive an email asking why you missed the final exam; correct?
A Yes.
Q And even stating that your pay may have -- may have been docked for that?
A Yeah.
Q Okay. Now, on page 41, the sort of large message --
A Uh-huh.
Q -- from your mother -- she says, "The more I think about it, you should definitely send him your previous crazy emails and tell him -- exaggerate if necessary -- that you spoke to her about this, and she was supportive and told you it would be fine."
She's referring to that situation we just discussed; right?

A Yeah. Where I let her know beforehand.
Q Okay. What "previous crazy emails" is she talking about?
A I'm not sure what emails. Probably something from Anna where she -- you know, we had talked about it in the emails.
Q Okay. So we've just been saying "the professor." You said "Anna." Who is the professor?
A Anna Swartwood House.
Q Okay. And did you have any previous issues with her?
A No. Absolutely not.
Q Okay. So you don't know what your mom means by "previous crazy emails"?
A No, I'm not sure.
Q Okay. And your mother is telling you to exaggerate the situation when you respond to Graciano; is that correct?
A Which part does it say that?
Q The second line.
A Oh, I think by "exaggerate" she means that I just need to be extra clear about -- that I spoke with her.
Q There's a difference between being very clear and exaggerating what happened.

A Exaggerating could mean exaggerating artificially, or it could mean exaggerating as in lengthening something as well.

You don't have to agree with that.

Q Okay.

A I'm not really sure what there was to be exaggerated by your apparent definition of exaggerate.

Q Okay. On page 40 you describe -- right about in the middle of the page -- you say, "Yeah. David buys all these groceries and teaches us how to cook"; is that correct?

A That is correct.

Q You made octopus with arugula and potatoes?

A That is what I said, yes.

Q Okay. And is that kind of what we were talking about? the seafood that you aren't particularly thrilled about?

A Yes.

Q Okay. Further up the page you mentioned, "For dinner we had some braised pork chops, grilled zucchini and peppers." After that you say, "We went to local café for cappuccinos and pastries this morning."

Is that accurate?

A Yes.
Q So is that kind of an accurate summation of your dining activities while you were in Italy?
A Yes.
Q Okay. At the very top of page 40, you say, "In the mornings we help clean the school"; is that correct?
A Yes.
Q Okay. You didn't tell your mother that you were working for eight, nine hours a day, did you?
A No. Because this was clearly the day after I got there. So our intensive labor apparently had not started yet.
Q Okay. On page 39 about three quarters of the way down, you say you had gelato with raspberries on top.

Where did y'all get gelato?

A At the grocery store.
Q Okay. Said, "David is actually pretty cool. I like that he makes us all join in on the cooking."

Is that a true statement?

A I wouldn't agree with the cool part anymore, but he did have us join in on the cooking.
Q At the time it was a true statement?
A At the time, yes.

Q Okay. Towards the top of page you say, "I will say he does make sure we are fed and watered"; is that correct?
A Yes, that's correct.
Q And right above that you say, "He brought me extra blankets."
A Apparently we got extra blankets.
Q Okay. And right above that your mom asks, "How is Cody?"
Is she talking about Cody Unkart?
A Yes.
Q Okay. And also reading through this, on page 38, your mother mentions, "Nikki and Cody went to a movie." Now, Nikki is your twin sister; correct?
A Yes. And Cody is my brother.
Q Okay. So you have a brother named Cody, and you're in Italy with a Cody?
A Yeah.
Q Okay. Reading through this for a second, I was a bit confused.
You and your mom talk about Cody Unkart a little bit, don't you?
A Which part are you referring to specifically?
Q I don't think I marked it. Well, what was yours and Cody Unkart's relationship?

A We had been friends for a long time.
Q Okay.
A We both went to Coastal Carolina. He graduated a year before me. We're still friends actually.
Q Okay. Was it ever anything more than friends?
A No.
Q Okay. On page 31, right about in the middle, maybe a little bit lower. Your mother says, "Document, document, document. Sounds dumb until it isn't. Just you" -- it says "ring alone." I think what she meant to say is just you being alone right now is not cool.

What is she telling you to document?

A I'm not really sure. I'm trying to read this backwards to figure out what the context -- because, again, this is three years ago. So give me a second.

I'm not entirely sure.

Q Well, we'll say that --
A I don't know if there wasn't like a photo or something that I sent or something that's not showing up here.
Q Go back to page 32. About a third of the way down you say, "That is true. People as a whole are just really shitty. It makes the good ones stand out.

Like Cody doesn't give a shit that I'm in the school building alone. He doesn't care."

What are you talking about there?

A I don't know.

Q Okay. Was it fair to say that -- do you recall when Alex Stasko arrived in Italy?

A Vaguely.

Q Was it about the 10th roughly?

A That sounds about right.

Q Did things kind of change after she showed up?

A Yeah, they did.

Q Okay. What changed?

A Just the whole working dynamic. The amount of work we were doing increased. Her -- she didn't, like, really contribute to the work that we were doing. She always did less work because she was usually with David. But she was very critical of, like, myself and the work that I was doing. And she was the one that said that I was on my phone a lot even though I wasn't. We were listening to -- like I said before, we were listening to music.

But the attitude and the kind of working relationship dynamic definitely changed when she came.

Q Okay. And you're telling your mother that, and, in

fact, you say that -- you mentioned that Professor Voros is treating her differently; is that correct?

A Which page are you?

Q Go back to page 35. Second blurb. You say, "I'm tired of being around these people already. All we do is paint walls all day. And David has a weird obsession with Alex. As easily and quickly as I seemed a part of, I am in the way pushed out of it."

Is there -- what I understood from reading all of this and -- I'm skipping around because you and your mother are talking about a couple of different things some of which is not relevant here.

A Yeah.

Q But it seems like Alex shows up. Professor Voros is paying more attention to her. Is that fair to say?

A Yeah, absolutely.

Q Okay. Were Cody and Antonio paying more attention to her?

A Yeah.

Q Okay. And you kind of felt like the fifth wheel?

A I wouldn't say that I felt like the fifth wheel, but I felt way more like I was just there to be labor.

Q Okay. Did you feel like that prior to Alex showing up?
A I felt like we were -- I was starting to get the impression that we were there as labor. But it was more like an overwhelming sense when she arrived. Yeah.
Q Okay. Then that's leading us into page 31, that comment where your mother says, "Document, document, document."
Do you recall specifically what your mother was telling you to document?
A No. I have no idea. Unless she was talking about me documenting the conditions of the school because it looks like I said, "My nose has been bleeding."
Q Okay.
A I think I must have been talking about the conditions, and she probably told me to take pictures of the conditions of the building.
Q On page 30, right about in the middle, you say, "David has basically making us paint an entire basement with brushes because it's old stone and rollers don't work."
Well, that kind of happens, and I've seen the pictures. If it's these old bricks that are misshapen, a roller is not going to paint it;

right?
A Yes.
Q Okay. So you have to do it with a brush?
A Yeah.
Q And that's more laborious than being able to roll it out real quick; right?
A I think -- I don't know that it's more laborious. It's just a different type of laborious.
Q Okay. And that's where you're talking -- you say, "Alex gets up this morning and basically says 'Y'all have to work faster'"; is that right?
A Yeah.
Q And you say, "If David wants it done any faster, he can do it his damn self."
Did you say that?
A Probably, yeah. Something to that effect.
Q Okay.
A I don't know if it was those specific words but probably. Because at that point, I was clearly feeling like we were just like slave labor painting in the basement.
Q Were Cody and Antonio saying anything like that?
A They were.
Q Okay.
A And I don't want to comment specifically what they

were saying. You can ask them if you would want, like, a specific record. But their sentiments were very similar to mine.

Q Okay. And I will talk to them, and I do appreciate your attempts to keep things kind of civilized and nice.

But just so there's no ambiguity, what did they say to the best of your recollection?

A They -- in summation they were also not happy with the amount of work that we were doing.

Q Okay.

A And that's just the summation of it. Nobody was really happy. I was just the only one that actually ended up voicing concerns.

Q So they didn't say anything to Alex or Professor Voros about any of that?

A No.

Q Okay. At the top of page 30, did you say, "I don't mind working because I do have a free place to stay and food, but Alex fucking sucks"?

A Yeah, it would appear that I said that.

Q Okay. So you didn't mind doing the work because in exchange for that work you got a free place to stay in Italy and all the food we had discussed?

A I didn't mind the work to a certain extent. But

after a certain point it was clear, like I said just a minute ago, that it was clear that we were there for labor and not for the purpose of, you know, expanding our, you know, art knowledge or seeing artwork or improving our art as originally described to us as the purpose of the trip.

Q What day did you arrive in Italy?

A The 4th.

Q Okay. What day did you make the statement that you didn't mind working?

A The 12th.

Q Okay. So by the 12th, you hadn't become fed up yet?

A I mean, it appears as though based on some of my other comments that I was somewhat fed up but trying to be optimistic.

And I think it's fair to say that.

Q On page 15 -- and it says you sent photos, but the photos didn't come through when I copy/pasted everything.

But your mother asks if you can screen capture something. She says, "If you want, I can email her and add my legal twist."

Do you know what she meant by "legal twist"?

A I don't know. But I do know that my mother is a

lot more, like, willing to, like, tackle problems head-on than I am. I tend to be more passive.

And I think she was, you know, getting concerned for my well-being at that point. So I think she wanted to make sure that if something were to go wrong that she was prepared.

Q Does your mother have any legal training that you know of?

A No, absolutely not.

Q So she's never worked as a paralegal?

A No. This is her being a smart-ass.

Q Okay. Fair enough. On page 10, the third line down, you said, "They said I could eat at a hotel for 15 euros per meal which is kind of expensive." And your mother responds, "Just eat. I don't care what it costs. Enjoy your meals"; is that correct?

A Yes, that's correct.

Q And that was on May 16?

A Yeah.

Q I will say my belief -- and you correct me if you think I'm wrong -- but I think the time stamps here are Eastern Standard Time in South Carolina, and Italy is about six hours ahead?

A Yes, I believe so.

Q Does that seem roughly accurate?

A Yeah.
Q Okay. I could be wrong on that. That's just my understanding, but we'll proceed with that. Because it says about 8:20 a.m. which would be about 2:20 in the afternoon in Italy; correct?
A Correct.
Q Do you remember having this conversation?
A Vaguely. It's been three years. But I'm seeing it, so it obviously occurred.
Q Well, this is where you're talking -- the incident on the side of the road had occurred; is that correct?
A What are you -- page are you on?
Q On page 10 still.
A And what was your question? I'm sorry.
Q I said the incident on the side of the road had occurred by now; correct?
A I believe so, yes.
Q Okay. And so you're still in the ICA building in your room kind of talking to your mother and figuring out what you're going to do; right?
A Yes.
Q Okay. That's where we had talked before and I had asked you why you didn't just go eat at the hotel. But you had said they weren't always open; correct?

A They're not always open, no.
Q Okay. At any point did you refuse to go to the hotel and eat because you thought the 15 euros was to expensive?
A No, absolutely not. If I was hungry, I would go find food.
Q Okay. But you're saying -- you're mentioning specifically that 15 euros per meal is kind of expensive. Why would you bring that up?
A That's just in my nature. I'm very, like, thrifty typically. And so that's just my weird humor to point that out.
Q Okay. But at some point Professor Voros told you that you were -- you could stay in the room at ICA. You didn't have to do any of the work, but you would just have to provide your own food; is that correct?
A Yes, he did say that. But he had also already threatened to call the police or to call his attorney and get me removed. So I wasn't entirely sure that that was an accurate statement.
Q Okay. Did David Voros say that directly to you that he was going to call the police and have you removed?
A He told Alex who came and told me twice.

Q But you didn't hear him say that specifically?
A No.
Q But when he did come and talk to you, he told you that you could stay there?
A I don't remember him specifically saying that directly to me. I know he and I spoke in his office room downstairs, and he wanted me to call my mom and say that I was safe. So I was assuming that he was going to let me stay there. But I don't remember what specifically. I'm sure it's in one of the recordings.
Q Which conversation was recorded? Was that in his office?
A Yes. You can actually see on page 9 where I make a comment about "nowhere opens up until 3:30."
Q Right.
A Which kind of reiterates my point about they're not operating on the same hours we do here.
Q Right. Well, everything closes down.
A Yeah.
Q Someone had said for what they call "siesta"; is that right?
A Yes.
Q Do they call it that in Italy?
A I guess. I don't ...

Q Or do they call it that in Mexico?
A I think so.
Q I don't know what they call it everywhere else. I'm kind of wondering why I don't get to close down during the day.

So what I'm wondering is -- you're complaining about your access to food. You're saying, "Nowhere opens back up until 3:30." Why didn't you just go get something to eat at 3:30?

A I did wonder around after that point when no one was in the school building. I would leave and go try and find somewhere to eat. But a lot of stuff was closed. Not everything was opened and readily accessible.
Q So you didn't find anyplace open?
A I ended up getting some, like, snack food. There was like a little market thing that was open.
Q Okay. Do you remember what you got to eat?
A No, I don't remember specifically.
Q On page 4, you say, "Spiders are worse than scorpions."

Do you really think spiders are worse than scorpions?

A Depending on the type of spider.
Q That's a fair point.

A I don't know what the appropriate answer to that question is.
Q I was surprised to hear you say that. I'll put it that way.
A I think my comment here "spiders are worse than scorpions" -- probably because there was more spiders, and I kept finding them in my bathroom, and they were very large. Scorpions tend to, like, hide under stuff.
Q I don't think my wife would agree with you. Is it fair to say in reading this, and you may want to take a minute and read through it, but you never complained to your mother about any form of sexual harassment, do you?
MS. ALBRECHT: Object to the form.
A No. Again, like I said before, my biggest concern was being left on the side of the road and then being threatened to have the police called on me and being removed from the premises.
Q (MR. GESSNER) Okay.
A Apples and oranges on that one.
Q Sure.
A I feel like that -- the concern over my, like, actual safety and well-being trumps everything else in my opinion.

Q Okay. We'll talk about that in a minute. But is it also fair -- and I think I may have said this before. You really didn't have any serious complaints about the facility. You didn't raise any serious complaints until that incident happened on the side of the road.

MS. ALBRECHT: Object to the form.

A I think I've verbalized a few times that it was not the conditions that I was expecting and that it was cold and it was dirty, especially to Antonio and Cody. We all kind of, you know -- since we were working alongside each other, we kind of discussed that with one another.

But I'm not typically someone who, like, complains. It takes a lot for me to kind of, like, call out something or address it in the way that I did when I emailed him when we got stuck in, you know, in Terni. It takes a lot to push me to that point because I tend to be very, like, calm and shy and just -- I'm the type of person that gets, like, my work done and, you know -- never had an issue with faculty. Never had issues in school or anything like that.

So for me to get to that point, it's -- I was trying to stay very optimistic in hopes that it

would get better until the point where it was not -- that was not happening.

Q (MR. GESSNER) Okay. While you were at Coastal, did you ever file any complaints?

A No.

Q Okay. And I don't have a copy of it with me, but I saw a photograph that you had sent to your mother of the thermostat in the -- I'm guessing it was in the ICA building.

Do you recall that?

A Yeah.

Q I think it said it was 17.6 degrees Celsius.

Do you recall that?

A Yes.

Q Okay. Do you know what time of day you took that picture?

A I think midafternoon.

Q Do you know how cold it got at night?

A No, not specifically.

Q Okay.

A I think I took the picture because -- to show that the thermostat wasn't working more so than a depiction of the actual temperature.

Q Well, the heat could not be turned on; correct?

A Correct.

Q Okay. You had said just a moment ago about sort of the incident on the side of the road, getting chewed out, and then being threatened to be removed from the ICA facilities.

Is it fair to say that if neither two of those things happened, we wouldn't be here today?

MS. ALBRECHT: Object to the form.

A If getting thrown out of the building hadn't happened, yeah, we might not be here today.

Q (MR. GESSNER) Okay. So if Professor Voros had just kind of come and got you from Terni or even if y'all made your way back -- if he just came and picked you up and brought you back to ICA and you just went about your business like you had, is it fair to say that we wouldn't have a lawsuit here today?

MS. ALBRECHT: Object to the form.

A Yeah. If that hadn't happened and then when I got back if USC hadn't mishandled the complaint about it, then, yeah, we wouldn't be here today.

It was never my intention to have any kind of lawsuit. I just wanted to finish my degree, and I wanted USC to handle it properly. And that just didn't happen, so that's why we're here today.

Q (MR. GESSNER) When you say "USC mishandled" it --

and you had mentioned that before. You talked about how some of the dates are incorrect and things like that.

But do you believe that the fact that USC, and I mean Carl Wells with his determination, and then the appellate panel and President Pastides -- the fact that they did not agree that your complaint violated Title IX -- is that part of your assertion that they did not investigate properly?

A I think that I made the assertion --

MS. ALBRECHT: Object to the form.

A -- is that they didn't follow the proper procedures especially in the EOP office. Proper procedures weren't followed.

Q Okay.

A And I also believe that USC and the School of Visual Arts and Design shouldn't be allowing a professor to be taking students over to Italy and using class time, school email, recruiting on campus, contacting the department, to organize trips for his own personal benefit of having, you know, basically free labor to set up his school building. Something that he owns and is profiting from. So I think that's a misstep by USC as well.

Q (MR. GESSNER) Okay.

A And then, you know, my -- we talked about earlier the accommodations after the fact. Like, okay, that they, you know, didn't agree -- we didn't agree on the findings of the complaint, but they didn't even do anything to make my degree stay on course or to accommodate me or, you know, to help me continue with my education in light of the fact that there was no-contact order and a complaint and all this stuff that had transpired.

USC did not do anything to kind of facilitate that and make it, you know, like, the degree that I was paying for. They definitely didn't do that.

Q Are you aware after your lawsuit that on several occasions copies of your lawsuit were hung up in the School of Visual Arts and Design?

A I am aware of that particular incident, yes.

Q Did you hang up copies of your lawsuit?

A Absolutely not. I have not been back to Columbia.

Q Okay. So you didn't bring a bunch of balloons with signs hanging off of them that say things like "ICA is a lie"?

A No, absolutely not. I was actually just made aware of that when talking with Samantha prior to this deposition. So -- which I found quite entertaining.

But I had nothing to do with that or any of the activism that's going on, on campus.

Q You had nothing to do with it. Did you have any knowledge of it prior to your attorney informing you of it?

A Like I said, I did have knowledge of the lawsuit being plastered around classrooms and stuff. A graduate student in the art history department sent me a photo. There wasn't any real conversation about it. She was just like, "Did you know this was going on?" And I said, "Nope."

And then I got a photo, I guess, a week or two ago from Autumn Wertz who is a current graduate student. And she sent me a picture of, I guess, whatever group is doing all this stuff. They made like a list of, like, demands or something like that. I saw that. But past those two things, I was not contacted about it.

Q Okay. Now, I want to ask you what your -- what we call damages. Sometimes people will call it your injuries.

You've described that you were not able to get the concentration in painting on your degree; is that correct?

A Uh-huh. That's correct.

Q Okay. So how has that affected you?
A It's affected my ability to pursue, like, a career in teaching painting. Also that's been affected is my ability to get a recommendation from anyone within the department. I've actually -- when I apply for positions, and I'm still kind of in the process of trying to find something within my field, I don't have art faculty that will recommend me because of all of these things that have transpired. I'm, again, viewed as like a behavioral problem. So people will refuse to, you know, write me recommendations.

So I've been having Dr. Hardee who I worked for -- she writes me recommendations because she loved having me work for her. But that's been a big struggle because I don't have anyone to recommend me for my positions that I'm applying for within the art field.

And I don't have the portfolio of student work or the experience in teaching because of my degree being altered off course and, you know, having to kind of scramble and find my own assistantships just to, you know, have some money coming in and have that stipend and stuff.

Q As you sit here today, can you think of any other

way in which you've been damaged?

MS. ALBRECHT: Object to the form.

A One of the things is just, like -- I guess, like, my personal well-being. It made my entire grad school experience incredibly stressful and -- I don't know. It's caused a lot of, like, anxiety and stuff as well.

My experience is just -- after, you know, these events has just been completely unpleasant. I've never, ever been considered a problem by anyone, especially in like an academic or a professional setting. So that's been kind of rough.

But having -- I'd say the biggest thing is -- you know, I paid for this degree to get a painting concentration, and I wasn't able to because USC wasn't able to accommodate that being that their painting department for graduate students is a married couple -- or no longer married, but that type of thing. They don't allow for any, you know -- going off with that.

Q (MR. GESSNER) And even after Professor Voros and Professor Bowers split, you never thought about taking courses with Pam Bowers?

A I thought about it, and I actually talked to her

about doing that. But, again, going back to just having this incredibly stressful anxiety-inducing experience, I just didn't want any, like, reminder of everything that had gone on, and did not what to do that.

Q Okay.

A And I was already, like, past the amount of credits that I -- like it wouldn't have -- you need a certain amount of credits if you need that concentration. And by that point where they had split and I would have been able to do that, it wouldn't have been enough time to get enough credits to get that concentration.

Q Okay. Can you think of any other ways you've been damaged?

A I'm sure that there are other ways, but that's all that's coming to mind at this moment.

Q You had mentioned stress and anxiety.

Did you ever seek out any counseling or anything for that?

A I actually went to the -- I'm trying to think of the acronym -- that's on campus. Because I ended up talking to one of their counselors over there. I actually originally talked to them about my thesis project since it had to do with sexual

assault.

But they actually have counselors there, and so I ended up talking to one of their counselors about the stuff that had gone on here because she could tell that I was very just, like, stressed out and anxious.

Q Okay. Anything beyond that?

A No.

Q No counseling? No medications or anything like that?

A No.

Q What is it that you want out of this lawsuit?

MS. ALBRECHT: Object to the form.

A I'm not sure that I -- there's -- I just want there to be some type of resolution that I never got from the complaints that I tried to file with USC because they mishandled it. And some kind of, like, ramification for my degree being kind of derailed. That's one of the biggest things. And I want some kind of -- I don't know what the proper word is.

But that's just like one of the hardest things has been the fact that my degree completely got derailed, and I have this degree that I'm not using or having a hard time using because I can't get

recommendations or references. And I don't have the same experience and portfolio of work.

Like I said before, I never even came into this, like, lawsuit with the expectation of anything. I just wanted something to be done. I don't even ...

Q (MR. GESSNER) How did you meet your lawyer?

A Here in Columbia. My mom and dad are the ones that kind of suggested that I pursue this legally. I tried to when I came back from Italy when I was having issues going through USC, and it was kind of dismissed by the attorney that I spoke with.

But after having all the issues with my thesis and just completely being stressed out by my entire graduate school experience, my parents suggested that, you know, we should just look into seeing if there was any legal recourse.

So she Googled -- or maybe I think -- I don't know if the -- if Preston Brittain who I had talked to -- if he suggested her or --

Q Okay.

A -- how that was found. But my mom organized that, and she'd be better able to explain that.

Q Okay. So Preston Brittain did represent you for some time; correct?

A I don't know that he, like, represented me per se, but we spoke to him just for some, like, legal advise to see if there was anything that would be able to be pursued.
Q Okay. But ultimately you were put in contact with Ms. Albrecht; correct?
A Yes, that's correct.
MR. GESSNER: Take a quick five-minute break. I want to go over my notes. I think that may be all the questions I have.
(Off the record at 4:16 p.m.)
(Back on the record at 4:22 p.m.)
MR. GESSNER: I have no further questions. Thank you for your time and your patience.
THE DEPONENT: Thank you.

EXAMINATION

BY MS. MOOSE:
Q Good afternoon, Ms. Dunavant. My name is Julie Moose, and I'm an attorney. I represent the International Center for the Arts, LLC.
Are you familiar with International Center for the Arts or ICA as we call it?
A Yes.
Q And what do you know about ICA?
A That it's a business that's registered in South

Carolina with David as the primary owner for that. I believe that Pam was at some point or at least listed as she was the co-owner, but I believe that it was just registered under his name and that it was a program that USC had sent students to and that other universities were sending students to, to study art.

Q Now, what's the basis for your understanding?

A Which part of my understanding?

Q About what ICA does?

A There was posters all around school advertising for the USC in Italy trip that mentioned the ICA. And then there was some postings on USC's website as well discussing the ICA before my trip to Italy. I Google-searched it and, you know, went through the website.

Q Okay. So before you went to Italy, you went to ICA's website?

A Yes.

Q And what information did you learn from the website?

A I just kind of read the description about, like, Monte Castello itself and saw some pictures of other groups in Italy.

Q Okay. And was it your understanding that there

were more groups than just a USC group that may go?
A Yeah. I think there was something like with some Chicago school or something that went there. And I saw some photos with some Asian students. I don't know where they were from.

But, yeah, it was my understanding that there were other groups besides USC.

Q And what type of information did you learn about the facilities that are used in Italy from the website?

MS. ALBRECHT: Object to the farm.

A There was some pictures on there from the, like, I guess art studios which didn't accurately reflect what I saw when I was there. I don't remember if I looked at any pictures of inside the actual building where we slept.

I do remember looking at the pictures of the art studios and some of the, like, students' artwork and stuff. But, again, that didn't accurately reflect what I saw when I was there.

Q (MS. MOOSE) Now, why did the pictures of the studio space not accurately reflect what you saw when you were there?

A I'm not sure why it didn't look the same. But it didn't reflect -- you know, the pictures, you know,

had, like, furniture. It looked like people had been using them. They looked clean. It looked like a friendly environment. And it's not really what we got there and saw.

Q Well, what was your understanding it was going to be like?

A Just not dirty and filthy and, you know, totally like uninhabited for I guess since the last summer.

Q And what was the basis for your understanding that it had been inhabited and it was clean and it was going to be there like it was in the pictures when you got there?

MS. ALBRECHT: Object to the form.

A I don't know that I thought that it was going to be inhabited per se since it is like a summer-based program that usually goes on there. But I think it's reasonable to say that no one expects to go into a building that's covered in cat urine and, you know, just dirty and that level of gross.

Q (MS. MOOSE) When did you first complain about the facility that you were staying at in Italy?

A To whom?

Q Anyone.

A I mean, I think that I complained to some other of the grad students when we got there. We all kind

of, as I expressed before, we all kind of voiced concerns about the environment that we were working in and how it wasn't really what we expected.
Q Did you have that conversation with anyone other than the two other students who were with you, Antonio and Cody?
A Are you asking if I said that to David?
Q To anybody else.
A No. There wasn't really anyone else to voice that to, so, no.
Q Okay. So you didn't voice it to David. And you said before that you and Cody had been friends for a long time, I believe?
A Yes, that's correct.
Q And when's the last time you spoke with him?
A Probably early November.
Q And what did y'all talk about then?
A Not really too much. He was just telling me that he's still an adjunct at USC, but that he'd like to leave because of all the drama that's going on within the department. Just kind of catching up and asking me what I was doing.
Q So what did he tell you about the drama going on with the department?
A I didn't really hear anything specific. Just --

Q He just said there was drama?
A Yeah.
Q And what is your current relationship with Cody?
A We're still like casual friends. Not, you know, super close friends because we don't live near each other. You know, we're friendly.
Q Did you talk with him at all about any communications he had with USC about the allegations in the complaint?
A No.
Q Did you talk with him at all about his statement that he gave --
A No.
Q -- to USC?
A No. I only recently read his statement.
Q And did you talk with him at all about the lawsuit?
A No.
Q Did you tell him you might call him as a witness or you had identified him as a witness?
A No. I think he knows that at some point he's going to be -- you know, he's mentioned in there. And he's aware of that, and obviously he gave a statement to the EOP.
So I'm sure he, you know, is aware that at some point, you know, he would have to say

something.
Q And what is your understanding of the testimony that he could offer if you called him as a witness at the trial?
A I don't really have any understanding of what that would entail.
Q So you haven't talked at all with him about what testimony he would give and whether he agrees with your version of the facts?
A No.
Q When did you first hear of ICA?
A When David had suggested that going to Italy would be good for my artwork and my paintings.
Q And when was that?
A I guess sometime within the spring semester of 2016. I don't know specifically.
Q And I believe you testified earlier that all of your communications with David about the trip were when Cody and Antonio were also participating; is that correct?
MS. ALBRECHT: Object to the form.
A There are some email conversations that I believe you guys have access to that discuss the trip. I believe there was many that Cody and Antonio were cc'd on, or it was sent to them as well. But in

person, Cody and Antonio were typically present for the discussions about Italy.

Q So how many times did you meet personally about Italy?

A I'm not sure specifically. I know it had been mentioned kind of in passing during our life drawing class. But I remember at one point we all sat down after the class to discuss it, me, Cody, and Antonio and David.

Q Okay. Tell me everything you can remember about that meeting after class.

A At that meeting we were kind of talking about what the arrangement would be for us going to Italy. And this is kind of where he told us that in exchange for us helping set up the school that we will receive our accommodations and our meals.

And then we started talking about, you know, purchasing flights and trying to get all that kind of stuff organized, like all the details of that and that we'd need to transport materials for him.

Q Do you remember anything else about that meeting? Anything that was said or anything else about it at all?

A Just that we would be helping set up for the USC in Italy group that was coming to the ICA and that we

would be setting up the ICA.
Q So it was your understanding that you were to go help set up for students to come to ICA in return for lodging and food?
A Yes.
Q And what were the dates going to be for the trip?
A May 4 through -- it was supposed to be three weeks. So I don't know specifically what three weeks from May 4 is, but three weeks from May 4.
Q And what date did you actually leave?
A May 17, I believe. We were supposed to, like, leave the day before the USC in Italy group got there.
Q But when did you actually return?
A The 17th.
Q And in your discussions with David about this opportunity to go to Italy, did you ask any more questions about the type of work that you would be doing?
A No. There was some emails that he sent that were supposed to be in preparation for us going and just kind of describing how there would be some, like, cleaning and that type of thing.
But, no, we didn't really discuss it fully. So we all kind of just, you know, thought it was

going to be light cleaning and setting up. There was no discussion of the depth of the activities.
Q And why is that?
A I'm not sure.
Q You weren't curious about what exactly you'd be doing when you got to Italy?
A I thought that setting up and light cleaning -- making beds, setting up art supplies kind of covered the scope of what would be expected.
Q But you didn't ask?
A But I didn't ask for any clarification.
Q So all you basically knew was you were going to set up?
A And do light cleaning.
Q So David actually --
A And set up the art studios.
Q -- used the words "light cleaning"?
A Uh-huh.
MS. ALBRECHT: Is that a yes?
THE DEPONENT: Yes. Sorry.
Q (MS. MOOSE) Okay. Do you recall anything else about that meeting?
A No. Just that it was in the classroom on campus.
Q Okay. Were there any other meetings before you left for Italy?

A Not that I can recall at this time.
Q Okay. So if I wanted to know the substance of what you understood, I'd need to look at the emails and then what you just testified to as far as that meeting? You don't know of anything else?
A Yes, that's correct.
Q And was ICA mentioned at all in your communications with David about the trip?
A Yes, it was mentioned.
Q Okay. And in what way?
A That we were setting up for the school to go there and that it was an art school. Kind of just basic description, kind of what's on the website type thing, like an intro.
Q Okay.
A Of like this is an arts program that people come to from different places to kind of gather and have like an arts community within Italy.
Q And did you have any communications with David about who you would be working for?
A No.
Q What was your understanding?
A That I was a graduate student going with my professor to help set up for USC in Italy.
Q And who was going to pay for your accommodations

and your meals?
A It wasn't my understanding that anyone but David would be paying for my accommodations and meals. And David is the owner of ICA.
Q And so did you understand that ICA would be paying for your meals and providing your lodging?
A No.
MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) So it was your understanding that it was David individually?
A At first, yes.
Q Why did you bring this lawsuit and assert the claims that you have against ICA?
A Because David is the owner of the ICA.
Q Is there any other reason?
A Because USC had some kind of partnership with the ICA and even President Pastides has been over at the ICA and posted about it on social media and on USC's website. So there's some kind of clear involvement there.
Q What exactly did ICA do wrong?
MS. ALBRECHT: Object to the form.
A Well, David is the owner of ICA and, therefore, is the ICA. So that can kind of, you know -- with everything that I've already stated -- is the ICA.

Because David is the ICA.
Q (MS. MOOSE) So all of the actions that give rise to your claims are things that David did?
A For the most part, like being left on the side of the road and being in accommodations that were poor and all that. Yeah.
Q So are -- is the basis for all of your claims against ICA actions that were taken in Italy between May 4 and May 15 or 16?
A Which actions are you specifically talking about?
Q Whatever actions give rise to the causes of action that you've asserted against my client, which is ICA.
A I guess so.
Q But everything occurred in Italy; correct?
A Yes.
Q And that would be between May 4 and when?
A Three weeks from May 4. I don't know what the specific date is.
Q But you weren't there --
A The 17th. Yeah, the 17th is when I went home.
Q Do you have any complaints about anything else about ICA other than the actions that occurred in Italy between those dates?
A I don't think so.

MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) Anything else you remember about the ICA website that you looked at before you went to Italy? Anything else you learned about their facilities or anything about ICA?
A No. I mean --
MS. ALBRECHT: Object to the form.
A -- I really didn't do an in-depth investigation into the website. So I just kind of, you know, wanted to see some photos before I went there. That type of thing.
So it wasn't anything, you know, extensive. So, no.
Q (MS. MOOSE) And at that time I believe you testified your relationship with Professor Voros -- I should call him that instead of David -- was strictly student-professor relationship?
A Yes.
Q And there weren't any problems at all in anything that he had done?
A With -- when? Your question is very broad.
Q Okay. What complaints did you have against David Voros before you left for Italy?
A Like I said earlier, besides the fact that he would rarely show up to meetings and be tardy for class,

that type of thing, I didn't have any issues.
Q Did you think he was a good professor?
MS. ALBRECHT: Object to the form.
A No. But I don't think that's really relevant.
Q (MS. MOOSE) When did you meet Alex?
A I don't know specifically when I met Alex. She kind of just lingered around the department even though she had graduated. And she would use the facilities.
Q And what type of relationship did you have with her before you went to Italy?
A Just kind of a casual, I guess, acquaintance, friendship type of relationship.
Q Did you talk with her at all about the trip?
A I knew she was going on the trip. And at first I was kind of glad she was going because it would be another, you know, female presence and someone for me to hang out with during the trip.
Q And did you communicate with her about what her experience had been when she was previously at ICA?
A She had kind of mentioned that, you know, she had been there before and that it was a good time for her to make artwork and kind of develop some of the -- I don't know what types of artwork that she was doing.

Q So I know this is going to be tedious. But I'd like to go through day by day what happened in Italy.

So I'm going to direct you that way. If you need to look at a calendar or anything, just let me know. But what time did you arrive in Italy?

A I don't know off the top of my head. This is going to be difficult for me to give you specifics of a day by day since it was three years ago. But go ahead.

Q Okay. So you arrived on May 4?

A Yes.

Q And were there any problems getting to Monte Castello?

A Yes.

Q And what were those?

A We had trouble trying to figure out where we would go from the airport and contacting David because he gave us very ambiguous directions.

So we had some kind of troubles trying to figure out where we needed to be and which bus to get on and that kind of thing.

Q What did you do physically on that first day?

A Spent a lot of time at the airport trying to figure out where to go. And had a long bus ride. David

eventually picked us up at like a gas station thing, I think.

Q And do you know what time you first arrived in the village itself?

A Not until later. Not until nighttime.

Q Okay. And did you have any problems or complaints on Day 1?

A Not were verbalized, no.

Q And did you communicate with your family that everything was fine? You were good? safe?

A Yeah. I communicated that I was safe. I made my flight. Made it where I was intended to be, yes.

Q Okay. And what did you on May 5, which would have been Day 2?

A I honestly don't remember specifically what we did the first day.

Q Do you remember if you worked at all that day?

A No, I don't remember. I wish I remembered more for you specifically.

Q I understand. And did you text any with Alex?

A I know I had messaged her at some point on Facebook. But I don't believe it was that first day. I'm not sure exactly what time it was that I messaged her. There was some kind of Facebook communication between the two of us, though.

Q Okay. And what did you talk about?
A Just that I was excited for her to get there.
Q And did you tell her you were having lots of wine?
A I did.
Q Didn't have any complaints on Day 2 back then?
A On -- are you talking about when I communicated with Alex?
Q I'm talking about everything that happened on Day 2.
A I guess not.
Q You had some communications with your mother where she said, "They have to accommodate you since you can prove previous harassment, too, if necessary." And I'd like to ask you what she is referring to there.
A I'm not sure what she's specifically referring to.
Q Would it help you to look at the text messages?
A Is that this --
Q It should be the last exhibit that was marked for May 5. But I can give you -- let's just go ahead and do this. Let's just go ahead and mark these.
(Defendants' Exhibit No. 11 marked for identification.)
All right. I'm going to hand you what's been marked as Exhibit 11. And what I have done is gone through the Facebook messages for each day that you

were in Italy, and I just want to ask you if these are your messages from your first day when you arrived in Italy with your mother?

A Yes. These are May 4. So that would be my first day.

Q Okay. Are you very close with your mother?

A Yes.

Q And if there were any issues would you have communicated that to her?

A To a certain extent.

(Defendants' Exhibit No. 12 marked for identification.)

Q (MS. MOOSE) If you could look at Exhibit 12 and tell me if those are your text messages from May 5, your second day in Italy.

A I think they're Facebook messages, but, yes.

Q And so it appears you sent your -- some pictures to your mother that day?

A Which day?

Q May 5. This is all on May 5. There's other emails on there for that day, but if want to start at the back and read forward if you need to read them.

I have a couple of questions about communications on that day.

A Okay. What's your question?

Q Okay. I believe you previously testified about the

issue with your TA position. Have we covered that in detail?

A Yeah, I believe so.

Q All your conversations about that?

A Uh-huh.

Q And I believe you previously testified that you didn't know what your mother was referring to when she said "to send the professor's crazy emails and tell him exaggerate if necessary"?

A Wait. Which part are you reading that says crazy emails?

Q It is May 5.

A Which page number?

MS. ALBRECHT: It's going to say 179 at the top, if that helps.

THE DEPONENT: That does help.

Q (MS. MOOSE) At the very bottom of 179.

A I think she was just talking about -- prior to me being in Italy, we had already discussed me going to Italy and missing the final. And we had already cleared up between her and I that that's what was happening, and there wasn't an issue that was expressed to me with it until after I was already in Italy and she had ran into Dr. Graciano in the hallway or something and had mentioned it.

And I think it was more of an issue for him, and he kind of felt bad that she was grading all the finals by herself because the other TA wasn't there also.

And I think she's just, again, being a smart-ass saying "crazy emails," talking about send him the emails where she said it was okay that you weren't going to be ...

Q But you hadn't had any prior issues with the professor you were --

A No.

Q -- TA'ing for; right?

A No.

Q So getting back to my original question -- I'm sorry. We detoured. Your mother said in an email, "they have to accommodate you since you can prove previous harassment, too, if necessary."

I'd like to find out what she was referring to.

A Which page are you on? So I can look at it with you.

MS. ALBRECHT: That says 180 at the top.

THE DEPONENT: I don't know where we're going here.

MS. ALBRECHT: It's about halfway down the

page.
A And what is your specific question?
Q (MS. MOOSE) Okay. About the middle of the page, it says, "They have to accommodate you since you can prove previous harassment, too, if necessary."
A I honestly don't remember what that particular part of our conversation was about.
Q Had you been harassed in connection with your graduate program at USC?
A Not that I'm aware of. I know I had some issues trying to get a studio art assistantship. I was given art history when I got there unlike my peers who had gotten studio art. But that's the only thing that I can think of that I had issues with. I'm really not sure what she's referring to.
Q When your mother says that you were accused of being disruptive in an incoherent email and then she retracted it, what's that about?
A I have no idea.
MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) So we'd have to ask your mom about that?
A Yeah. That would -- both of those questions would probably be a good thing to ask her about because I don't recall what she's asking about.

And as you can see what I respond, I have very short responses. So it's quite possible that I'm not sure what she's talking about specifically. Yeah. That would be a great question for her.

Q And your mother advised that you should "take the offense."

A Which page are you on?

MS. ALBRECHT: 180.

MS. MOOSE: I did not document them this way.

A I don't know.

Q (MS. MOOSE) Your mother seems to give you the advice a lot to document everything. Is there some reason for that?

A She's just an overly cautious type person because I feel like -- I don't really know. She's just very overly cautious.

Q Is there any reason that you've had in your past that you need to document things?

A Not personally in my past, no.

Q It just seems like it's every day you talk to her, she's saying "document, document," and I'm just trying to understand --

A I think she's just a paranoid parent with a child in a foreign country. You'd have to ask her

specifically why.
Q But you told your mother on Day 2 that you were happy and safe?
A Yes.
Q Did your mom know Cody?
A Not personally.
Q But she asked about him; is that correct?
A Still on page 180? Sorry. I'm trying to follow where we're at.
Because I just want to make sure that if you're not talking about where she mentions my brother Cody.
Q I understand. Let's see. She mentions on page 175 at the top that you say that David brought you extra blankets. She asked about Cody.
A I don't know if I actually said that David brought me extra blankets. I just said "he" brought me extra blankets. So that might have been Cody bringing me extra blankets. I'm not sure. But, I mean, yes. She knew that we were friends. But she wasn't, you know, personally familiar with Cody.
Q Did your mother know Professor Voros?
A No, not personally.
Q So the only information she had would have come from you?

A Correct.
Q And if you could just read page 175 and confirm if you were saying that David brought you extra blankets.
A I can't confirm that as I just stated. It's unclear from the messaging.
Q When you said, "He does make sure we're fed and watered," you were referring to David -- Professor Voros on that comment?
A Yes. Which may have been referring -- I'm sorry. I'm trying to read -- it's going up this way; right?
Q Yes.
A It's going up? Then, yes, I may have been saying that. I'm just trying to follow these.
Q What were you told to take with you on the trip?
A Sleeping bag -- I remember we were supposed to take a sleeping bag. I think something for water. I know we were told to pack light because he wanted us to transport stuff from the school building and from his house to Italy with us for the ICA.
Q Were you told to bring warm clothes because it got cold at night?
A I don't remember specifically if we were told to bring warm clothes. I think we all did bring warm

clothes. As a precaution we all brought some jackets and stuff. I think in one of these messages I read earlier I said I didn't bring enough jackets. But I did bring jackets.

Q How much money did you take with you on your trip?

A I have no idea at this time. I don't know.

Q What kind of budget did you put together for the trip?

A I didn't really put together a budget.

Q So what were your plans if you -- did you plan to go shopping?

A Yeah. And I brought my debit card, which as I said earlier, I think I had a couple thousand, 2,000. Nothing over 5,000. And I think I got some euros, like, just a little bit to have in cash.

Q Okay.

A But I used my debit card some.

Q Was money an issue or a problem while you were in Italy?

A Not until I was worried about getting home. Then I was kind of, like, panicking. Like what can I do if I need to get a flight quickly, which I'm sure my parents would have tried to help if it came down to that. Would have done anything.

Q And did you buy things while you were in Italy?

Did you get to shop?
A We didn't do too much shopping. I think I bought a sketchbook and a bracelet. When we were in Rome, me, Cody, and Antonio -- I bought a scarf because I couldn't go into the churches without covering my shoulders.
Q And did you ever stay in any room other than your room while you were in Italy?
A No.
Q You didn't ever stay in the room with Cody?
A No. I did move to a different room because I liked it better because it had a better shower and bathroom attached to it. But, no.
Q Were there problems with your room?
A Besides just being cold and dirty, no. There was walls and a window and a door.
Q Was it beautiful there?
A The views were really pretty. Italy itself is a beautiful country and the town was kind of, like, eclectic and, you know, small Italian town. But I wouldn't say that the school building was beautiful, no.
Q It wasn't what you expected?
A It wasn't what I expected, and it wasn't beautiful.
Q It wasn't consistent with the pictures --

A No.
Q -- on the Internet?
A No.
Q If you could look on page 176. I want to ask you about the comments at -- I guess that's your comment at 10:24. What is that in reference to?
A On 176 my comment at 10:24?
Q Yes.
A The one where I say, "Happy wedding anniversary"?
Q No. First you said, "and we had gelato with raspberries on top. David's actually pretty cool. I like that he makes us all join in on the cooking," and then it says, "And fine."
What does that -- what are you referencing there?
A Oh, "and fine." I'm saying in response to her saying something about me. She says, "You got to sleep." And I was like, "I'm in bed, not just asleep yet. Time change is a bitch." And she's like, "Trick yourself into sleeping," and I was like, "And fine," like I'm going to go to sleep.
Q Okay. And then your mother said, "He will be an ass in a couple of days. Y'all didn't bring his penises." What does that mean?
A So he wanted us to transport these, like,

anatomical body part things, and I think I had mentioned that offhandedly to her that there was one that was a penis situation. And so she's being a smart-ass as well in response.

Q And so why did she say, "He'll be an ass in a couple of days"?

A I guess she thought that he'd be mad we didn't bring -- because we didn't end up bringing all of the stuff that he asked us to bring because we just couldn't fit it in our luggage.

And so she's -- she's joking and being a smart-ass saying that he's going to be mad we didn't bring all the stuff he asked us to bring.

Q And as far as reporting to your mother what y'all were doing, what did you tell her?

A Are you referring to a specific message? Or are you just asking in general?

Q Well, I think you told her in the mornings we help clean the school.

A Then that's what I told her.

Q And you assured your mother that Professor Voros was taking care of you?

MS. ALBRECHT: Object to the form.

A Did I specifically say that he was taking care of me outside of the fed and watering thing? Are you

referring to message beside that one?
Q (MS. MOOSE) Just in general. I'm just trying to get an idea of what you were telling your mother was going on.
A Well, it looks like I was telling her, you know, that I made it safely and was kind of telling her some of the activities we did.
I don't think I expressly stated that I was being taken care of. Unless you see where it says that.
Q What did you do on May 6, Day 3?
A I don't know specifically what happened on May 6 outside of, you know, reading any of this documentation.
Q On Day 3 did you have any concerns or issues?
A I don't recall at this time.
MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) What do you recall about Day 4 which is May 7?
A I, again, don't recall specific dates and specific activities that happened on the dates being that it was three years ago. I kind of more remember, like, milestone-type things.
Q So when's the first time you do remember what you did on a day?

A I mean, I remember generally what we did. To say that I didn't remember entirely what we did is not quite accurate or fair. But, I mean, obviously, since it was kind of like a traumatic experience being left on the side of the road, I obviously remember, you know, the trip to Italy and, you know, that whole ordeal. I remember our trips to Perugia and Assisi. Outside of those, I just know that we were working and eating meals at his house.

Q So before being left on the side of the road, you don't remember any problems or issues that you were having?

MS. ALBRECHT: Object to the form.

A I remember that, you know, all of us -- and when I say "all of us," I mean myself, Cody, and Antonio had some issues with the type of work that we were doing and that not being what we expected because we really wanted time to, like, work on art and actually use the studio spaces that were at the ICA. But we never got to use those. So I remember that being, you know, a concern that we didn't get to do any art. I think the only time I got to do any drawing there was when we were in town for a couple of days, and I would take my sketchbook into the art museum or church or whatever.

Q (MS. MOOSE) So you didn't use the studio at all the entire time you were there?
A No. We walked into it to kind of look at it. And David one evening after dinner, after everyone had been drinking and stuff, they walked over there, like, really late. And I didn't go because it was late, and I knew we'd have to get up and go the next morning and work again. So I was like, "I'm going to sleep."
Q But you could have gone?
A Just that one time. And they didn't really stay over there long. It wasn't really an art making time. It was a socializing about art time. It wasn't like a -- we had access to the studios to go just hang out. We were primarily working and didn't have time for the studios outside of that.
Q And did you ask for studio time?
A We were told we were going to get studio time. I didn't think that I needed to make a demand for it.
Q So at no time you said, "I was told I was going to get studio time," or "I want to go work in the studio"?
MS. ALBRECHT: Object to the form.
A No, I didn't. Because I didn't think it was necessary.

Q (MS. MOOSE) What do you remember about May 7? Do you remember anything about that day?
A I will let you know as soon as I see this document.
Q I'm just saying --
A No. I don't --
Q -- before you see the document, do you have any memory as we sit here --
A No. Again, specific day, date-type situation -- I'm not going to have anything for you outside of reviewing the documents because it's been such a long time.

It appears as though we were going to Perugia that day which is when I was talking about earlier. Whenever he had to go run errands, we would go with him, and we were in Perugia for a little bit. I remember we went to one of the art museums. We didn't have a lot of time there, but we got to take our sketchbooks in and draw.

(Defendants' Exhibit No. 13 marked for identification.)

Q (MS. MOOSE) So was that a good trip?

MS. ALBRECHT: Object to the form.

A It was fine. It wasn't, you know, great. But it was a trip, and it was, you know, cool place to visit. It wasn't like a long trip because we were there just for the errand purpose, so it was a

short trip, and we had to get back to work.
Q (MS. MOOSE) Do you remember any complaints you had that day?
A No.
Q And did you tell your mom you should have brought some warm jackets, actual jackets rather?
A It would appear I did. I think I read that somewhere.
Q Page 174.
A Yes. Because I just brought, like, normal jackets. I didn't realize it would be so frigid in the building.
Q Did you look up the weather before you left?
A I did. Yes.
Q And what did the weather --
A It looked like it was pretty, you know, moderate. And if there had been AC and heat in that building that was functional, I would have been fine with what I had brought with me.
Q You weren't aware that the heat wasn't going to be on in the building?
A I mean, I think he mentioned that it wasn't going to be on, but no one anticipated that it would be that cold.
Q And your mom told you to buy a coat. Did you buy a

coat?
A No. I didn't have any place to buy a coat. My mom likes to tell me to buy stuff.
Q Do you remember anything about what you did the day after you went ...
A No.
Q Don't remember what you did the next day?
A No.
Q Do you remember if you had any questions or concerns?
A Not specifically.
Q How about May 9, Day 6? Do you remember anything about that day?
A No, not without, you know, reviewing messages or things like that. No, I don't remember.
Q Was there a problem with your sleep while you were there?
A I mean, I was having trouble adjusting to the time difference, and I was cold, which kind of makes it hard to sleep. But other than that, I don't ...
Q Had you ever been out of the country before?
A No.
Q Had you traveled a lot before this trip?
A Yes.
Q Where had you been? Where have you traveled?

A I've been kind of all over the United States. I've been, you know, Washington -- kind of all over that state. I've been to California a few times. Indiana, Pennsylvania, New York, Texas, Florida -- pretty much the entire East Coast. Through the Midwest. Been to Montana.

I made it my goal to try and go to all 50 states. So almost there.

Q Your mother asked you on May 8 if you were dating Cody yet. Why would she ask that question?

A Because me and Cody have been friends for a while. We've been really close for a while, and it was always kind of the joke -- and even with students in the graduate department that eventually we would date. And we never did.

Q Do you remember anything about Day 6, which was May 9?

A No.

Q How about May 10, Day 7?

A The same answer.

Q Do you remember what day Alex arrived?

A I don't know specifically. I know it was prior to our trip to Rome, so it had to have been prior to that weekend. Maybe around the 10th. That's not a specific answer, but a few days before our trip to

Rome.
Q And we previously -- you were asked about how things changed when she arrived. And we've covered that; right? I don't want to ask you about that if you've already told us everything you remember about how things changed once she arrived.
A I mean, the expectation --
MS. ALBRECHT: Object to the form.
A -- for the work that we were doing changed. I mean, she became kind of demanding about what work -- like, she tried to act like a supervisor or step into, like, a supervisor role. And she -- although wasn't really participating as much in the work, she was kind of like, "Why aren't you doing this?" or "Why isn't this done yet? We have to get this done," type thing.
Q (MS. MOOSE) Was that a problem?
A It wasn't necessarily a problem. It was kind of frustrating considering she wasn't actually doing a lot of the manual labor.
Q Once she arrived, did you start feeling lonely?
A I mean, I kind of just -- I think once she arrived, I kind of just -- like I said already today -- became more focused on the fact that -- that we were labor.

Q And was that inconsistent with what you thought you were going to be doing?
A I didn't think that I was there as a workforce. No. I thought I was there to help set up but also to do my own art and kind of actually, you know, have experiences there myself outside of just being personal labor for the ICA.
Q And you weren't getting to do any experiences for yourself in your opinion?
A We just had those few trips. But, no, I don't think that the trip was about us expanding our, you know, art knowledge and art experience. I don't think that's what it was about. I think it was about us being labor with art experiences sprinkled on top.
Q And so you thought it was going to be more of an educational learning experience than what it was?
A Yeah. I thought that we would get studio time and we would get to, you know, see more art than we did. And, you know, maybe we'd work in the mornings and set up stuff, and then the rest of the evenings we'd be free. But that wasn't the case when I was there.
Q How many hours a day were you working?
A Like from, like, breakfast until lunchtime and then

after lunch until dinnertime, which was usually like at 7:00 or 8:00 or so. Maybe eight hours. Maybe more than that.

Q As of Day 7, which was May 10, you were still eating at Professor Voros' house; correct?

A Yes.

Q And why were you feeling -- starting to feel alone?

A Like I've already said, you know, David and Alex had this weird relationship, and she wasn't really required to do any labor. I just started feeling like we were just there for labor, and I felt like I was the only one that was, like, really feeling that way.

I mean, I know the guys were too, but they weren't expressing it as much as I was, at least, you know, even among each other. They weren't as verbal about it, but I knew they felt that way in some capacity. But because that wasn't, you know, being as reciprocated, or, you know, they weren't as concerned about it as I was all the time. They were at some points, but that kind of made me feel lonely because I was recognizing that this wasn't, you know, the trip that I had envisioned. And that kind of made me feel like I was isolated there.

Q But you think that Cody and Antonio were feeling

lonely also?

A I don't think that they were feeling lonely. I wouldn't use that word. I do think that they felt like -- and this is me -- I mean, I can't speak for them.

But I do know that they had some concerns with the work that we were doing but that they would not express it. You know, Cody has a more passive personality-type. And as I had mentioned earlier, Antonio felt indebted to David, so he definitely would not express it.

Q And do you remember telling your mother that day that you were lonely and that "being alone is almost not as lonely as being with people who make you feel alone"?

A Yes.

Q How were they making you feel alone?

A Because like I just said, you know, there wasn't really anyone to communicate my, like, concerns with outside of, like, you know, in passing them saying, like, "Oh, yeah. This isn't really what we wanted to do either."

So I was just kind of, like, struggling with that and, you know, having my expectations be let down.

Q What about the fact that -- didn't you have Cody and Antonio also?
A Yes. But like a lot of the labor that we were doing, we would do kind of solo. Like, I'd be in the corner, you know, painting one thing. Someone else would be in the different corners scrubbing something or upstairs sweeping, you know, cat shit off the porch. So we were kind of separated in a lot of capacity for some of the labor we were doing.
Q And on this Day 7, May 10, your mother is again telling you to document.
What did she want you to document?
A Are you about to show me a document that says that?
Q If that would help you.
A It would absolutely help me.
(Defendants' Exhibit No. 14 marked for identification.)
Q (MS. MOOSE) Can you identify Exhibit 14?
A Yes. They are Facebook messages between my mother and I.
Q Okay. Was your mother concerned you were working too hard?
A I don't believe at this time that she was.
Q And were you looking forward to being able to hide in your room that night?

A To hide in my room?
Q Yes, ma'am.
A Which comment are you basing that question off of?
Q Well, must be on the wrong day.
A But, I mean, on page 173 of Exhibit 14, there is a comment that I make on May 8 and I talk about -- you keep asking about the hours that we worked --
Q Uh-huh.
A -- you can see that I said, "I just got home, and it's almost 12:00. And David wants us up at 7:00 a.m." So that kind of gives you an idea or reiterates kind of how I said the schedule was.
Q And did you complain that the schedule was -- that you were having to work too much?
A At that point, no.
MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) You just kept your comments to yourself?
A Yes.
(Defendant's Exhibit No. 15 marked for identification.)
Q Sorry. I handed you the wrong email for the question I asked. I should have set these up different.
A It's okay.
Q I just assumed you'd have a lot more memories about

this.

A No. Unfortunately, I do not. After, you know, my complaint didn't really have any results that were beneficial, I kind of tried to, like, push most of it out of my thoughts so I could, you know, get through graduate school as stress-free as possible.

Q It just kind of looks from reviewing what's been marked as Exhibit 15, that there was kind of a change about how you were feeling about your experience this day. So if you could just look at those emails and kind of tell me what was going on, on the 10th.

A Okay.

Q All right. What was going on, on May 10?

A It looks like kind of the same situation. We were still working, but it seems like at this point is when I started to get more vocal about being, you know, not happy with the amount of work and the lack of studio time.

I think I mentioned at one point in here that they went over to the studios at night, but I was tired, and I didn't go. Just what I said to you earlier.

Q And you were also complaining about the people who were there?

A Which part are you referring to me complaining?
Q On May 10 at 6:17, you said, "Yeah. Not feeling too good. Tired of being around these people already."
A Yeah.
Q So you weren't happy with anybody who was there including Cody and Antonio at that point?
A I think that I was getting unhappy with them at this point because they were just getting kind of complacent with the amount of work we were doing even though they disagreed with it.

And that tends to rub my personality type the wrong way when people know stuff is wrong and don't say anything about it.
Q And what did you say about it being wrong?
A I mean, I hadn't said anything directly to David. I think I had made some, like, passing comments about, you know, "When are we going to get to go to the studios?" or, you know, "How long are we working until? Are we going to get some free time?" type thing. But I'm not sure specifically.
Q You don't have any specific recollection of saying those things to him?
A No, not specifically. It doesn't mean that I did not.

Q Did he have any idea that you were feeling lonely and wanted to be alone?
A I don't think that I wanted to be alone. I think when I said that I "looked forward to being able to hide in my room at night" is because, you know, we just kind of, like, worked all day, and then we'd have dinner and stuff. And it was nice to actually sit down and relax.
Q Well, I get from these comments to your mother that it was a little bit more than that.

Did you tell her that the people were making you feel alone or different?
A I mean, I said that I was, you know, feeling, like, out of place. And, again, that goes back to the fact that I was recognizing that this wasn't the trip that we had planned and it was a work trip. Like, it wasn't an "explore Italy trip." It was a "come do labor for me trip." And that was frustrating, and I felt alone in my, you know, concern with that and that I was the only one not being, like, complacent with the amount of work that we were doing.

But beyond that, I don't -- if you're trying to read it as a depression or some extenuating type thing, I think you're incorrect on that assumption.

Q Well, I don't want to make any assumptions. I'm just here today to ask you what you remember about your experience and what happened.

And these comments that you're -- because your parents are back in the United States and you're communicating with them what's going on; right?

A Yeah. Absolutely.

Q And anytime you had a concern you would talk to your mother about it; right?

MS. ALBRECHT: Object to the form.

A I mean, not, you know, every time. I don't want to say that it was "anytime" I had a concern I talked to her about it. But quite often I would share concerns with her. Yes.

Q (MS. MOOSE) And you had a lot of communication with her on May 10; is that correct?

A Yes. It looks as though I did.

Q And I think she says in these communications four times that "make sure you document weird s-h-i-t. Always good to have in your back pocket video and pictures. But seriously, document any inappropriate s-h-i-t. You might need it later. Just saying. Document, document, document. Sounds dumb until it isn't. The evidence you document."

Why was she focusing on that so much?

A I mean, again, you'd have to ask her why she's focused on that.

But I do know that in situations like this where it's a he said/she said type thing that it is better to have, you know, actual, like, proof of, you know, the living conditions. And at that point I was, you know, concerned about the living conditions.

So that's what I -- that's all I took pictures of was the living conditions. It's not like I was over there, you know, paparazzing people or anything like that. The living conditions, as I've expressed, was a concern. So that's what I documented.

Q Okay. So -- how did you document that?

A With my phone.

Q Okay. What pictures did you take?

A I took pictures, I believe, of some of the bugs that were in there. I took a picture of the porch that had the debris and the cat feces on it. I took pictures of my bedding that had cat urine on it that was clean prior to being in Italy. I think I took a picture of the basement that we painted.

Q Anything else?

A I'm sure there were other things, but that's all I

can think of right now.
Q Okay. And your mother was concerned about whether you were eating. What did you communicate to her about that?
A I think she was just referring to the fact that I think in one of my messages I said that we'd have, like, a small lunch and then we wouldn't have dinner until late. And she knows that sometimes I get -- like, my blood sugar drops and I get feeling sick if I don't eat regularly. So I think that was just her being parental.
Q What did your mother mean when she said -- she told you to "try to have fun even alone in your head"?
A She just means, like, try to, you know, find things to enjoy even if you're not enjoying the overall experience.
Q There's a reference to Ethan. Who is Ethan?
A He was -- well, a friend for a while, and then Ethan and I briefly dated.
Q What's his last name?
A Ethan Deets. He's not in Columbia.
Q Do you still see him?
A No.
Q Have you talked to him at all about this litigation?

A No.
Q Did you reach out to him when you got back from Italy?
A I think we've had some kind of on and off communication. I don't remember specifically what was communicated, but I don't believe he's aware of the lawsuit unless he's Googled my name anytime in the current time.
Q Who is Julie?
A She's another grad student.
Q Had she been to Italy?
A No.
Q And what was the issue with her?
A I didn't have an issue with her.
Q Why did your mother feel that it was inappropriate for David to treat Alex differently?
A Because she was supposed to be there on the same premise that we were.
Q It's your understanding that she had the same arrangement that you did?
A Yes.
Q And her purpose for being there was the same as yours?
A That was our understanding.
Q And what was the basis for your understanding?

A I'm not sure specifically right now. I guess just that she had been around the art department and was coming to Italy. And I don't believe she paid for her flight, so I assumed that there was some type of, you know, work --

Q She was no longer --

A -- relationship exchange.

Q -- a student at USC; correct?

A No. And I'm not sure if she was faculty at that point. She just always kind of lingered and used the facilities which led me to believe that she was either, you know, faculty or something because you don't typically let random people that aren't affiliated with the university use the facilities.

Q Anything else you remember about May 10?

A No, not specifically.

Q So by May 10, you still hadn't had any discussions with Professor Voros about anything that you had a complaint about?

MS. ALBRECHT: Object to the form.

A I didn't have any actual -- there was no actual discussions about the, like, work labor or anything because, again, like I said earlier, I wasn't going to -- I'm not a type of person that complains easily, like vocalizes it and -- especially to

people that are, like, professors or, you know, supervisors at work, et cetera. So I wasn't ever going to say anything that was negative like that.

The first time that it became an issue was when I was told that I was, you know, on my phone too much or that -- when he yelled at me outside of the car on the side of the road that I was deficient in my work duties. I think he mentioned it in an email as well. That was the first time it was kind of like a discussion, if you want to call it that.

Q (MS. MOOSE) And so that was on May 15?
A That was on that weekend around Rome, uh-huh.
Q Okay. Do you remember anything about May 11, which was your 8th day in Italy?
A No.
Q Any problems? concerns? discussions?
A I'm not going to say that there weren't concerns or discussions because I'm not currently aware or remember that specific day.
Q How about May 12?

MS. ALBRECHT: Object to the form.

A Again, my answer is going to be the same. I'm not going to say that there weren't because I don't specifically recall that day.

(Defendants' Exhibit No. 16 marked for identification.)
Q (MS. MOOSE) Can you identify what's been marked as Exhibit 16?
A Yes. Is this again in backwards order?
Q Yes. All the emails are.
Does this -- these communications with your mother refresh your recollection about anything that was going on, on Day 12 -- I mean Day 9, which was May 12?
A I haven't fully read through them. But from what I'm reading, yes, there are some things that are -- I'm remembering now because I'm reading it.
It looks like on that day Alex stayed in bed hung over.
Q Why are you so angry at Alex?
A I'm -- I'm not angry at Alex. I have no feelings towards Alex at this point.
Q Well, I'm just reading your email at 3:07 a.m. on --
A Oh, you're asking why at this point?
Q What's that?
A You're asking why at this point I'm angry at Alex in these messages; correct?
Q Yes.
A Okay. It would appear based on what I'm reading

that I'm angry because she's not doing the level of work that we're all doing, that she gets special advantages.

Q So you hate Alex because she's not doing the same work you're doing and she's getting --

A I don't think I ever --

Q -- different treatment?

A -- actually hate Alex per se. I think I'm just really frustrated because we're doing all of this labor, and we're -- you know, I'm tired at this point.

Q And I'm just referring to the May 12 comment at 3:07. "I hate Alex so much."

A No. I see where you're reading that from. But, again, that's just me responded to the fact that I'm tired and don't think that it's fair that she's not doing the same amount of work.

Q And it seems that you seem to be communicating to your mother that "Cody and Alex keep ditching" you. What does that mean?

A I kept getting left different places to do work by myself. And I think, again, like you mentioned with my other messages, that I was doing these, like, work tasks where I was very isolated to do them.

Q And what advice did your mother give you?
A I mean, on the other messages she said, "Just try to find little places to be happy." I don't -- I haven't read all this, so I don't know if you're referring to something specific.
Q Well, your mom said in one of these messages on May 12, "You need to speak up to David."
A Which page are you on?
MS. ALBRECHT: Page 151.
THE DEPONENT: Sorry I can't do this as fast as y'all. We're still back here.
A Oh, yeah. I think I was referring to when we were in museums that was just kind of walking around them by myself.
Q (MS. MOOSE) And did your mother tell you, you need to speak up to David? It appears that your mother was advising you or suggesting that you needed to speak with Professor Voros about your concerns.
A Yes, it does appear that way.
Q And did you?
A I don't recall if I specifically said something or not. Like I said multiple times, I believe that there were things that I kind of said in passing, but I never, you know, sat down and was, "We need to have a meeting," where we sit across from a

table and discuss this.

I'm pretty sure that I have made comments where I was like, "Hey, when are we going to be done working? Why are we still working? When do we get a break?" That type if thing.

But there was never, like, you know, a formal discussion.

Q Well, was Professor Voros aware at this point that you were unhappy?

A I believe so. I think it was a kind of apparent.

Q And how was it apparent?

A Because we were just, you know, painting basements and stuff. I don't think that I looked thrilled to do that.

Q But did you communicate verbally with him anything about your --

A He wasn't really present that often. He was usually -- would set us up with tasks and then leave.

Q Were you not still taking meals at his house?

A Yeah, we were.

Q So you did spend some time with him every day?

A We did. Yes.

Q Y'all were still cooking together?

A For the most part, yes.

Q And at that point did you intend to stay the entire time?
A Yes. But I wasn't -- I was clearly not enjoying my time. But I was intending to, you know, finish out what I had started there.
Q And did you have any complaints about your interactions with Eros? I think I'm saying that correctly.
A No, I don't believe so.
Are you seeing a specific incident?
Q It just says, "I've been hanging out with Eros because Cody and Alex keep ditching me."
I assume you don't have any complaints about him?
A No. No, I didn't have any -- any issues with him.
Q He treated you well, and there weren't any problems?
A Yeah. He's a very nice guy.
Q And do you remember what you did the next day, on the 13th?
A Sent a picture of meat. No, I don't know. I think we were working. Because if I sent this picture of lunchmeat, it was one of the days we had sandwiches in the school building. So we were working that day.

Q Okay. I'm sorry. I was asking you about the next day. Do you remember --
A You said the 13th; correct?
Q Yes.
A That's what I was responding to.
Q Okay.
A So the 13th -- I'm guessing that's around the time -- because I said on the 14th that we're stuck in Terni. So I'm guessing on the 13th we went to Rome.
Q Okay. Tell me exactly everything you remember about that.
A About going to Rome?
Q Uh-huh.
A We were supposed to go as, like, a group trip. Alex, Eros, and Davis went shopping or were doing something in relation to setting up the school. I think they went to IKEA because we stopped there.

Then they let us out at, like, a bus stop with instructions and, I think, a map of how to get around Rome and then just kind of the instructions to be back at the train station by 6:00 the next day.

Q And so this is kind of the day that everything fell apart?

A Not specifically that day. But the following day, when we followed those instructions and still, you know, messed up the transportation somehow, and then were unable to communicate with David. He refused to pick us up and, you know, lied about how far away, you know, Terni was from where he was and made up some -- or came up with some reasons why he couldn't, you know, pick us up or why we were stuck there for being disobedient or what have you.

Q So everything was fine on the 14th?

A Yeah.

Q All right. What --

A Well, I guess not the 14th because there's clearly a message here where I said, "Stuck in Terni."

Q Okay.

A So I guess the 13th maybe was -- no. The 13th looks like -- that's when I tried to call my mom because we were stuck still. That was the evening, so it must have been prior to that.

MS. ALBRECHT: I believe the timestamps, like Evan said earlier, are six hours behind. So if it says 5:20 p.m., that would be that evening, not -- that's five o'clock here time.

MS. MOOSE: Well, I'm just trying to get the timeline down.

Q (MS. MOOSE) Was the same problem -- came up on the 14th or the 15th?
A Whatever day we were coming back from Rome is when the issue arose.
Q And so you reached out to your parents and told them you were not happy?
A I didn't reach out to them first. I believe that I reached out to -- we tried to contact David. We tried to call him first.

And then I called my mom because we were, you know, kind of hanging out at the train station. And I was, you know, not comfortable with doing that. I was trying to figure out what to do; and at that point, I was also trying to email David and kind of let him know that we were stuck here and, like, "What could we do to get out?"

At that point he was getting angry at my emails and, you know, kind of accusing us of, you know, failing to follow instructions even though the instructions we were given were very ambiguous and, you know, hard to follow in a foreign country.

Q So was it a communication problem?

MS. ALBRECHT: Object to the form.

A Which part?
Q (MS. MOOSE) The reason that you missed the train.

A Yeah, I think it was a communication error. But, I mean, he considered it a lack of our ability to be obedient and follow instructions when really it was just, you know -- we made it there by the right time. It just -- that wasn't ...
Q So if you made it there on time, the train wasn't there?
A No. The person at the train station told us the next one wasn't leaving yet to where we needed to go.
Q And how did Cody and Antonio react?
A They were stressed out as well.
Q Did they tell you, you were overreacting?
A No.
Q They didn't?
A No. They didn't think that I should email David about it after we had already tried to call and he said no, but I was very confused as to why he couldn't come pick us up.
Q So you were angry with Professor Voros?
A I don't think that I was angry.
MS. ALBRECHT: Object to the form.
A I think that I was panicking because we were stuck in a town that we didn't speak the language and we didn't know, you know, how we were going to get

back. And I was trying to find us a way to get out of there.

But the guys were just as stressed out about that and panicky as I was. They just weren't willing to do anything.

Q (MS. MOOSE) That -- what's the basis for your understanding that they were upset?

A Because of how they were acting.

Q How were they acting?

A Panicky. Stressed out trying to figure out what to do, where to go. If there was a taxi or another bus or another train.

Q So what did y'all decide to do?

A Well, we tried to get in contact with David, and he said that he couldn't pick us up. And he, I think, mentioned something about somebody from the village could pick us up, but we'd have to pay them.

And he said that -- I think there's an email where he said that our, you know, inability to follow direction is not, you know, his problem. And so we ended up staying the night.

Q Okay. And so what happened next?

A We ended up getting food, and then we found a hotel and got a hotel room because we couldn't figure out how else to get home that night and figured that

there would be a train or bus or whatever in the morning.

Q And so when did the actual argument on the side of the road happen?

A When we actually got back to Fratta Todina later that evening and walked halfway up.

Q Okay. And so what date was that?

A The 15th maybe. I'm not, like, specifically sure the date.

Q Well, that's why I'm trying to nail down the timeline, whether it was the 15th or the 16th.

A I think it may have been the 15th, if I left the 17th.

Q So when did you actually go to the hotel?

A The 14th. When I say here -- or later that evening on the 14th when I say "Stuck in Terni. Fuck David." That message.

Q Oh, I'm sorry. I'm not being clear at all. I'm talking about the hotel as far as moving out of the facility you were staying in to the hotel.

A You mean once I got back?

Q Yes.

A Oh, yes. That was not clear. I believe, like, the night of the 16th.

Q Okay. So you believe --

A Because if I left the 17th, it would have been the night prior.
Q Okay. So the -- when did you actually get -- what was the day you went back up the hill and stayed in the building?
A Maybe the 15th.
Q Okay.
A Because if I say "I'm stuck in Terni" on the 14th, I would assume that it was the 15th.
Q Okay. So how long was it when you got back to the facility that you actually stayed there before you went to the hotel?
A Maybe like a day and a half.
Q Okay. That's what I'm trying to figure out.
A Okay.
Q All right. So tell me what you did during that time.
A I -- when I first got back up to the hill, I sat outside because I was told I couldn't go into the school building. And I think that's in one of these exhibits and my correspondence with Magdalena. That's exactly what I did.
And Alex came out and talked to me saying that, you know, I couldn't go in the building.
Q So how long were you outside the building?

A Only like a couple of hours. And eventually they decided that I could go back in. Or Alex communicated to me that I could go back in.
Q So when you say "a couple of hours," can you be specific?
A No, I can't.
Q Was it two hours? three hours?
A I don't specifically recall.
Q You don't remember how long you were sitting outside the building?
A Long enough to go walk to the hotel and still be sitting outside.
Q Okay. Nothing -- anything more specific about that?

MS. ALBRECHT: Object to the form.

Q (MS. MOOSE) Had you eaten that day?
A I think I had some snacks at the, like, bus stop or train station or whatever it was in Terni.
Q Okay. And what was everybody else doing while you were sitting outside?
A I don't know. I was outside.
Q Could you tell if they were in there working, or did they leave to go eat?
A I have no idea. I couldn't say. All I know is Alex came out to speak with me.

Q Okay. And then you went back and went to your room?
A Yes.
Q And how long were you in your room?
A I don't know specifically. I was in there the rest of the evening, I think.
Q And did everybody else leave the building at some point that night?
A I think they did to go eat dinner.
Q And did they bring you back something to eat?
A Cody did.
Q Okay. And was that a problem?
A No. Depends how you define it being a problem. I mean, it wasn't the best scenario. It wasn't the intended scenario.

So I mean, yeah, I ate. So that was not a problem. I was fed. But the whole situation was, yes, a problem.

Q Okay. So what happened the next morning when you got up?
A I don't remember the specific, like, timeline of events that day. I do remember at some point Alex came and talked to me again and told me that David was trying to contact an attorney or police or that he could, you know, get me removed.

I remember David came to talk to me at one point saying that, you know, he would love it if I could still work there, but he didn't think that my attitude would allow that to happen. That kind of thing.

Q Well, do you understand why Professor Voros might have felt it would be appropriate for him to contact a lawyer to make sure that he was handling the situation appropriately?

MS. ALBRECHT: Object to the form.

A It was not my understanding that he was contacting a lawyer to see if he was handling the situation appropriately. It's my understanding he was contacting authorities and a lawyer to get me removed and to see if that would be okay for him to have me removed.

Q (MS. MOOSE) And what's the basis for your understanding?

A I was told by Alex and I saw emails later as well.

Q What emails did you see?

A The one that says that he should have had me put in jail like Amanda Knox.

Q Do you think it was being sarcastic when he said that?

A No, I don't.

Q And why is that?
A Because I know his character and I believe that that was something that he thinks should have happened. Because I believe he truly thinks that I'm a behavioral problem or, you know, mentally unstable or whatever thing he's created about me. I believe that he holds to that and believes that I should have been put in jail.
Q But is that just an assumption on your part?
MS. ALBRECHT: Object to the form.
A The email showing -- talking about the Amanda Knox thing is not an assumption. I read that, and he communicated, you know, with someone else in the department about that. So that's not an assumption. No.
My interpretation of it, I guess, could be an assumption. It's my interpretation just as it might be your interpretation that it was sarcasm. Who actually knows? It's in writing.
Q (MS. MOOSE) Well, once you made your -- voiced your concerns, were you taken care of and accommodations were made so that you could get back to the United States?
MS. ALBRECHT: Object to the form.
A Not immediately, no. Again, I spoke with Magdalena

who actually kind of seemed alarmed by the situation. She was very empathetic towards it.

Dr. Miller -- he, you know, called me at some point, and we talked on the phone. And he was mostly concerned with me saying that I was safe. He didn't seem like he was really interested in getting me out of there.

But eventually, yes, my mom was very persistent with her communication with USC. And eventually, yes, I was, you know -- my flight was taken care of everything.

Q (MS. MOOSE) And did your mother, again, recommend that you document everything and record Professor Voros without telling him you were recording him?

A She did recommend in that particular scenario. Because at that point, I really -- when police and attorneys and stuff were mentioned and the possibility of me getting thrown out of the building and not knowing where to go in a foreign country, yes, absolutely. She reiterated that I should, you know, make sure I had whatever.

Q And your mother was already considering filing a complaint at that point?

MS. ALBRECHT: Object to the form.

A I don't think she was considering filing a

complaint. I think her mission, as a mother, was to get me out of a situation where I wasn't safe.

So I don't think it was ever about filing a complaint. It was about "who can I contact to help my daughter get out of this foreign country in this situation where she may not be safe."

Q (MS. MOOSE) Well, did your mother say anything derogatory about Professor Voros?

MS. ALBRECHT: Object to the form.

A Are you referring to a specific message here?

Q (MS. MOOSE) Not in that exhibit. I'll be glad to show you an exhibit.

But I'm just asking for your recollection now.

A Oh, I don't -- I don't doubt it. I can't recall a specific time when she did, but I wouldn't be surprised if she did.

Q And I believe you testified earlier you did not seek the assistance from anyone in Italy?

A I -- I mean, which specifically -- I mean, that's, again, a broad question.

I did go to the hotel and see if there was any rooms left there. There was not. I did talk to a lady that spoke a little bit of English and kind of tried to explain the situation to her, and she was saying that there may possibly be someone I could

stay with in the village. But I didn't want to do that because I didn't really want to stay with a stranger.

I contacted my mom because I was, again, having spotty cell phone reception. I didn't even know where to begin contacting anyone back home or how to resolve the situation.

Q And did you try to get in touch with the police in the village?

A I believe I answered that earlier, and I said no, I did not.

Q And why is that?

A Because I didn't think that it would be helpful to my situation.

Q What did Cody and Antonio tell you about what they thought about what was going on?

A Can you make that a more specific question because that's kind of also very broad?

Q Okay. You told your mother "they're in here telling me I was wrong," Cody and Antonio.

A Yeah. At a certain point, I think David spoke with them separately and told them to come talk to me and kind of reiterate what he had -- his understanding was of our employee-employer relationship.

And I believe he talked to Cody and Antonio separately to make sure that that was clear to them so that they could tell me that I was incorrect in my understanding.

Q So tell me what you recall about those conversations?

A Basically what I just said. I was in the office room with David talking, and he had Cody and Antonio say that the relationship was employee-employer, David being the owner of the ICA and being our employer, and we were the employees in a contracted kind of position.

Q So Cody and Antonio didn't come to your room? All this took place in the office?

A That particular conversation, yes.

Q I believe you testified you had two conversations with Professor Voros?

A Yes. He came to my room at one point, and I wasn't really trying to have a conversation because I was kind of scared and, like, not really sure what was going on.

But then there was another conversation where I went downstairs and talked to him in the office, which is the conversation we've just discussed.

Q And have we covered what your fears were? I don't

want to ask the same thing over and over.
A I believe so. I mean, being left on the side of the road was very fear-inducing. The way David's anger just kind of exploded out of nowhere was scary because I'd never seen that before from him. And then the attitude about, you know, trying to find a lawyer or calling the police to have me removed when Alex kept telling me that that's what's going to happen and saying I needed to go apologize to my boss.
Q And have we covered everything that you remember about all those communications?
A Which communications?
Q The two communications you had with Professor Voros that day.
A I believe so. I mean, they were mostly just conversations about whether I'd be able to stay there and work, and he didn't think that I -- my attitude would allow that even though I said I'd, you know, be quiet and just work and finish out my time there.

He said he didn't think that that was a possibility until, I think, after he talked to USC -- after he talked to Allen Miller -- and was trying to get me to say that I was safe. Because

David also tried to get me to say that I was safe and to tell my mom that I was safe, even though I didn't feel that way, and was saying that I could stay in the room and then kind of come and go freely. But at that point, I did not feel safe, and I wanted to leave.

Q Okay. And I think we've covered why you didn't feel safe.

A Yes.

Q Is there anything else you want to add to why you did not feel you were safe?

A No. I think that's pretty clear.

Q But you weren't scared somebody was going to physically hurt you, were you?

MS. ALBRECHT: Object to the form.

A I don't think that that's out of realm of possibilities when you have a person that has that level of explosive anger.

Q (MS. MOOSE) Well, why do you say it was "explosive anger"?

A Because it was just completely unwarranted and just not, you know -- it's just all of a sudden. I mean, I got, like, yelled at because I looked down and to the side. So I wouldn't put it past him.

Q To physically hurt you? You thought he might --

A To physically hurt anyone. I mean ...
Q What made you think he might physically hurt you?
A I just told you why I thought that. Because his anger level is so explosive that I don't think that I would put it past him to do something like that.
Q Did he ever touch you?
A No.
Q Did he ever act like he was going to physically harm you in any way?
A No. But you asked me if I thought that it was a possibility, and my answer was yes.
Q And I think your answer is because he was screaming?
A Not because he was screaming. More so that his anger came out of nowhere, and it seemed unstable.
Q But that's your opinion; correct?
A Of course. It would all be my opinion.
Q Anybody else share that opinion?
A I'm sure his wife shares that opinion, ex-wife.
Q And how would you be sure of that?
A You know, that's not really my place to comment.
Q Is that an assumption on your part?
A Sure.
Q Or is that because you've spoken with her?
A I haven't spoken with her specifically about that,

no.
Q And so did you feel like you were in an emergency situation?
A Absolutely.
Q And do you feel at all like you might have overreacted?
MS. ALBRECHT: Object to the form.
A No.
Q (MS. MOOSE) So you didn't do anything wrong?
A No, I don't think so. I've often considered that, you know, in my whole process of doing this lawsuit and putting myself through all of this, like, "Oh, maybe I'm the problem." And, you know, the more I think about it, I'm differently not the problem.
Q Why did you file the lawsuit?
A Because the school didn't do anything. And I feel like there should be some form of justice here.
There should be, you know, some attention brought to this that the school kind of shoved it under the rug; and if nothing else, at least this is brought to light.
Because I'm not the only one that has an issue with Professor Voros.
Q So what do you hope to gain by this?
A Like I said --

MS. ALBRECHT: Object to the form.

A -- I just want it to be brought to light. I mean, I've had such a struggle, like, getting any, like, recommendations or anything because my reputation has kind of been tarnished based on what he said about me to other faculty and, you know, filing the complaint being seen as problematic.

So I'm at least hoping there's some, you know -- I get some validity out of this. I think that's important.

Q (MS. MOOSE) So that's what you hope to achieve is to get some validity --

A Yeah. It's one of the things.

Q -- and for someone to say you're right?

A I don't -- it's not that I want to be told that I'm right. I just want people to be aware of, you know, what's gone on; and they can make their own judgments if they'd like to.

But I think that it's important that it's discussed and how USC handles things. I hope that's discussed as well because there's not any avenues for graduate students to complain.

Q And so my understanding from your testimony is your basic complaint is that you got yelled at on the side of the road in a foreign country?

A No.
MS. ALBRECHT: Object to the form.
Q (MS. MOOSE) Okay. Well, tell me --
A That's a very nice summation of what my complaint is.
Q Do you want to elaborate what the complaint --
A Sure. My complaint is that I received harassment and that I was abandoned on the side of the road in a foreign country. Forget the yelling. Like, that's irrelevant to -- I mean, it's not cool to be yelled at or anything, and I didn't deserve to be yelled at. But that's absolutely a minor part of the whole issue at hand.
Q Okay. And I think we covered earlier your statements about how you were harassed.
Is there anything else we need to cover on that?
A No.
Q Okay. And when you say you were "abandoned on the side of the road," you weren't really left alone on the side of the road, were you?
A No. I was allowed to go in the vehicle with the random Italian man.
Q And the other people who were there knew him; right? He wasn't just a random --

A Alex knew him. But to me, he might as well have been a random Italian man.
Q And did he speak English?
A No.
Q Are you sure about that?
A I'm positive.
Q Did you try to talk to him?
A I did.
Q Tell me about that conversation.
A It was me speaking in English, and him not speaking English back. That's how that conversation went.
Q And how long a ride was it?
A I don't know. 20 minutes or so. I don't know how long the distance is. I wasn't really concerned.
Q But you got safely back to the -- where you were staying; correct?
MS. ALBRECHT: Object to the form.
A Correct.
Q (MS. MOOSE) During the approximate day and a half, I think you said, you were back in your room, did you stay in your room the whole time?
A No. I got out and walked around whenever they were at his house having a meal.
Q So that would have been the evening meal the first night?

A I think it was, like, the lunchtime meal I went and walked around and tried to see if anything was open so I could go get some food. And it was closed because it was siesta time or whatever.
Q How about breakfast that morning?
A I don't know if that's the morning Cody brought me food or not. I don't specifically recall. I'm sure it's somewhere in my statement.
Q Did you go hungry during this period of time?
A I mean, obviously, I didn't starve because I'm here talking to you. But I was not, you know, full by any means. I was hungry. And that's why I was, you know, out walking around trying to find somewhere that was open.
Q And eventually you found something to eat; right?
A I didn't find anything for lunch because everything was closed at that time. Cody brought me leftovers for dinner later, so I didn't eat during the middle of the day except for the snacks that were left in the building.
Q But there were snacks there?
A There was a few, like, leftover things.
Q What did you eat that day?
A I think that it's in one of these documents. I had, like, some oranges or something and, like,

cookies that I had left. Something to that effect.
Q But you weren't in danger of starving or anything, were you?
A I mean, I would have had to not been eating at all to have starved.
Q But you could have gone out any other time and -- when the grocery stores opened back up, you could have gone to the grocery store and bought whatever food you wanted?
A Like I said before --
MS. ALBRECHT: Object to the form.
A -- it's not as accessible as I think everyone seems to think that it was to go to a store here and get something because they all had weird hours that they operated. So it was a little bit more difficult. And, again, I didn't really leave the room until, you know, they weren't in the building. So it kind of limited my ...
Q (MS. MOOSE) And why is that?
A Because like I said before, I did not feel safe.
Q In what way?
A I've already explained why I didn't feel safe. But I didn't want to leave there until, you know, they weren't in there because he told me that I couldn't work anymore, have meals at their house, and, you

know, was threatening to call the police and attorneys and what have you. And I didn't want to aggravate the situation any further.

Q But they had communicated to you that you could -- you were free to move about and get whatever food --

A That wasn't until --

Q -- and meals on your own?

A That wasn't until later.

Q When was that?

A Sometime later in that afternoon.

Q After lunch?

A Yeah. At some point in between, like, lunch and dinnertime. Because based on earlier conversations, I felt like I couldn't really leave and go freely about.

Q Okay. So you don't know -- remember if you got breakfast that day?

A I think Cody may have brought me food. I don't specifically recall.

Q And he brought you dinner that night?

A I think so.

Q And you were free to go get something to eat on your own; correct?

A As we've discussed before, yes I was free. But the

accessibility of the food is not -- wasn't there.
Q What do you remember about the next day?
A The day that I went home?
Q Uh-huh.
A I got up at, like, 5:00 a.m. because David arranged for a local man to drive me to the airport. He only spoke a little bit of English. We rode to the airport, and I went home.
Q Any problems that day?
A No. That was the best day.
Q Did you have any other communications with Professor Voros while you were in Italy? Have we covered them all?
A I believe so.
Q Did your mother call the embassy?
A I'm not sure who specifically she called. I don't think she called the embassy.
I know she had a lot of contact with USC, USC's police department, and their study abroad people.
Q Have you listened to the recordings again that you took in Italy?
A No, I haven't.
Q What do you remember about those communications other than what you've already testified to?

A I don't remember -- other than what we've already said about the communication that I recorded with David. We've already kind of covered that one.

I didn't record the one with Alex. My mother recorded that. I was just on the phone with her before Alex came up to my room and she was telling me that I needed to apologize and that, you know, he was my boss, that type of thing. And I was, like, not understanding what the issue was because I didn't believe that I was there for an employee-employer relationship.

And then there's the recordings with Ombudsman Dale Moore, and then I recorded my initial meeting with Carl Wells. Both with their permission.

Q And you testified earlier about the communications that you had with the director of the study abroad office, Magdalena -- I can't begin to pronounce the middle name -- Hall?

A Yes.

Q Have you covered all of that that you remember? all of your communications with her?

A I remember most specifically speaking with her via Facebook Messenger. I think I may have -- there may have been an email where she -- or I don't even know if it a Facebook message or an email -- where

she confirmed that I, you know, had got on my flight and got out of Italy. That's kind of all that I remember in communicating with her.

Q Did she stress to you the importance of your telling her everything that was going on?

A I'd have to look through her messages to say if -- to see if she specifically said that. But I do know that I did tell her everything that was going on. I made sure to be clear and to, you know, write down and make sure she knew what I knew.

Q So you told her everything? You didn't leave anything out?

MS. ALBRECHT: Object to the form.

A I don't believe I left anything out.

Q (MS. MOOSE) But your intent was to be in full disclosure to her?

A Yes.

Q So was your concern that you were being kicked out of the place where you were staying?

A That was one of my concerns, yes.

Q And why was that so concerning?

A Because I'm in a foreign country and, like, in an authentic Italian, you know, village where I don't speak the language and it's very hard to get -- unless you have a car or you know someone with a

car -- to get to where you can, you know, get on a train or get on, you know, a bus, whatever to get out of there to go somewhere that's more designed for, you know, Americans or tourists.

Like, Rome -- if I had been there, that would not have been an issue because most people there speak English and there's, you know, very clear, like, transportation methods. Like, you're near the airport. You're near the train station. People can communicate with you. That wouldn't have been, you know, an issue. I would have been able to figure out how to get myself out.

Q But are you saying that you -- there was no way you could figure out how to get yourself somewhere else?

A Yeah. I mean, I could have walked. But that didn't seem like a great idea.

Q Were there other options perhaps?

A I didn't know any. I couldn't communicate really with anyone besides, you know, trying to be, like, point at someone's car and be like, "Hey, give me a ride to somewhere." There wasn't really anything that I knew of how to do.

Q And have we covered in extensive detail everything you can tell me about why you didn't feel safe?

A I'm sure I've reiterated the same thing to you repeatedly. So I'm sure there's -- there's other reasons that I'm not mentioning; but for now, that's -- that's pretty much all I have to say about that.

MS. MOOSE: All right. Y'all mind if we take a quick break?

(Off the record at 6:04 p.m.)

(Back on the record at 6:10 p.m.)

Q (MS. MOOSE) Ms. Dunavant, I just want to make sure that I've covered today all of the things that you said or believe or allege that ICA did wrong.

Have we covered everything? all your complaints about your time in Italy today?

A For the most part. I mean, there's a possibility that some things are being left out. But for the most part, I think we've covered quite a bit of the things.

Q Okay. And you have asserted a claim for battery. And what's the basis for that claim? How were you battered?

A Can I look at my --

Q Sure.

A Oh, I opened right to the page. Well, as I stated in my complaint, all of those, you know, stresses

as a result of the incident that happened in Italy and, you know, kind of what happened there.

Q So what was the -- what actions give rise to this claim?

MS. ALBRECHT: Object to the form.

A Being extremely stressed out and feeling unsafe for that period of time. Being panicked while in Italy. Being, you know, kicked out of the ICA building with uncertainty of where I'm going to go. Being, you know, verbally harassed and being yelled at for being disobedient and not fulfilling my work expectations.

You know, that and when I came back to school and, you know, my environment there had changed as well, which I discussed earlier how that environment had changed for me and how my graduate school experience changed as a result.

Q (MS. MOOSE) So basically, what you've just described as far as the International Center of the Arts, ICA -- that would have just been for May 15 and 16; correct?

MS. ALBRECHT: Object to the form.

A Well, we could also talk about how, you know, I came back and I had the ear infection, and I had, you know, stomach issues, which I think we had

talked about earlier as well, as a result of the living conditions.

I believe in one of the message exhibits you gave me between me and my mother I told her that I'm sick and that I'm not feeling well. I'm congested and that kind of thing, which is a direct result of the living conditions in the ICA building.

Q (MS. MOOSE) So is the basis for your battery claim against ICA the living conditions?

MS. ALBRECHT: Object to the form.

A The living conditions and the actions of the owner of the ICA who claims he was my employer.

Q (MS. MOOSE) Was he your employer?

MS. ALBRECHT: Object to the form.

A I guess depends on he said/she said thing. In my interpretation of our relationship, no. In his interpretation, yes.

Q (MS. MOOSE) Well, what was the relationship?

A He was my professor. That's my understanding. And I've expressed that repeatedly.

His, you know, understanding which he had -- Cody and Antonio reiterate -- was that we were there as his employees.

Q So that was your understanding?

MS. ALBRECHT: Object to the form.
A My understanding was that he was my professor.
Q (MS. MOOSE) And was it your understanding that you were an employee?
A No. But that was his understanding.
Q So did you have any relationship with ICA?
MS. ALBRECHT: Object to the form.
A If you go by David's interpretation, then, yes. I was the employee on his standards.
Otherwise, I was just an inhabitant of the ICA, invited there as a student.
Q (MS. MOOSE) So what claims do you have against ICA?
MS. ALBRECHT: Object to the form.
A I think we already discussed that.
Q (MS. MOOSE) Okay. Anything other than what we've already discussed?
A I'm sure there are other things, but that's all that I can think of right now.
Q And how were you assaulted?
A Do you mean like physically? Or just --
Q I'm just talking about your cause of action against ICA for assault.
A With the manual labor.
Q Anything else?

A And the, you know, retraction of the meals that I was told that I would be provided with.
Q So you're making a claim that you didn't get meals you were promised?
A No, not towards the end of my trip. I was promised meals for exchange for work. And I offered to do the work and was told that I couldn't. So, therefore, I didn't get the meals.
Q Hadn't you already decided at that point you wanted to go home?
MS. ALBRECHT: Object to the form.
A I don't know that I decided that I wanted to go home. I felt like it was necessary to go home.
Q (MS. MOOSE) When did you decide it was necessary to go home?
A As soon as I felt unsafe.
Q And when was that?
A Whenever I got back and was kind of left on the side of the road.
Q All right. So the assault was manual labor and retraction of meals. Anything else?
MS. ALBRECHT: Object to the form.
A And also the conditions that led me to be sick.
Q (MS. MOOSE) And when you say "be sick," that is your ear infection?

A Yeah. I also -- in one of my -- I think one of the exhibits you gave me actually -- mentioned to my mother that I'm congested and that I'm not feeling well.
Q Anything else? Any other injuries?
A That's all that I can think of at the moment.
Q And you've recovered from all those injuries today as we sit here; correct?
A Yes.
MS. ALBRECHT: Object to the form.
A For the most part except for, you know, like the stress and anxiety that had resulted from this whole experience.
Q (MS. MOOSE) You're still experiencing stress and anxiety today?
A Especially today.
Q Is that because you filed the lawsuit?
MS. ALBRECHT: Object to the form.
A No, it's not because I filed the lawsuit.
The, you know, the lawsuit is not my favorite thing ever. I don't enjoy any of this process. But, you know, the stress is from the rest of my experience in grad school, you know, the resulting experience afterward where I've been unable to use my degree or have anyone to write me

recommendations within the art department at USC. I don't have anyone that's able to do that from -- directly within my field.

I've kind of talked to Virginia Scotchie, who is one of the ceramics professors, but she can't write a recommendation attesting to my -- my painting or my drawing skills or that type of thing. So that's caused some significant, you know, stress as well.

Q (MS. MOOSE) As far as your thesis that you did, did you do any painting in connection with that?

A No.

Q It was all photography?

A It was all digital prints that I manipulated. I kind of stopped painting after the whole thing happened. I wasn't able to really take painting classes. I kind of tried to do different mediums. I started drawing.

Q Do you still paint today?

A I've recently started painting again now that I'm removed from Columbia and USC. I've kind of refound my love for it.

Q How were you falsely imprisoned?

MS. ALBRECHT: Object to the form.

A When I was made to feel that I wasn't safe if I

left my room and was told that, you know, I had to either be in there or, you know, go apologize to David for who knows what and made to feel like I couldn't leave it.

Q (MS. MOOSE) And we've covered before why you felt like you couldn't leave; correct?

A Correct.

Q All right. Have we covered everything -- everything that happened that gives rise to your claims against ICA?

A We've covered all that I can recall at this moment. I'm sure that there are things that I have left out that are within the documentation.

Q Have we covered all of your damages that you're claiming as a result of the actions of ICA?

MS. ALBRECHT: Object to the form.

A We have covered a good bit of the damages. I'm sure that -- again, that there's more that I'm leaving out that I can't recall at this particular time.

Q (MS. MOOSE) But as far as -- sitting here right now, that's everything?

A That's everything that I can recall right now, yes.

(Defendants' Exhibit No. 17 marked for identification.)

Q (MS. MOOSE) I hand you what has been marked as

Exhibit 17.

A This one?

Q Yes, ma'am. Can you identify that for me?

A This is a copy of my website that I had. I don't any longer have this website.

Q When did you take it down?

A I'm not sure specifically when I took it down. I wanted to redo it, and I just haven't got around to it.

Q Did you prepare everything that was on your website?

A Yes.

Is there a specific part that's in question?

Q Well, I just wanted to know if you actually prepared the information that was on the website or if you had somebody else prepare it.

A No. I did it -- all of the information is mine. I had an old professor from Coastal Carolina help me with my teaching philosophy because I wasn't really sure how to write one appropriately. So he helped me with that. But the rest of it is my preparation.

Q And what -- what do you try to focus on as far as subject matter or the type of art that you would like to do?

A For a while I focused on -- sexual assault was the topic of my subject matter in undergrad. But in grad school, I was more focused on how the legal system handled the particular case -- the guy that's in the mug shots for my thesis work.
Q And why did you focus on that with your artwork?
A Because of something that happened to my sister. That's why focused on it.
Q And how has your artwork been received?
A The first year of grad school I think I was really missing the mark with it and wasn't really communicating what I wanted to say about the subject matter.

But into my second year when I started drawing the mug shots and then my third year, my thesis work, was actually, like, received really well. I had a really good turnout for my thesis show. Got a lot of attention for it, and it got in some news articles and stuff. So it was received very well. I mean, there's always -- when you have a more sensitive subject matter, there's always a few people that, you know, don't support it. But for the most part, it was received very well.
Q Well, that's what I was asking was how people responded to what you were trying to say through

your art.
A Very well for my thesis show. I think the stuff I did in undergrad -- I was still trying to figure it out. So the response wasn't quite what I wanted it to be.
Q Do you describe yourself as an artist who works with social issues?
A Yeah.
Q And why is that?
A Because I think that art is a good vehicle for, you know, discussing that type of thing.
Q And are you trying to bring about social change through your art?
A Not currently. That was my intention with my thesis show.

Currently the artwork I make is just commissioned-base stuff where I'm, you know, drawing grandkids and pet portraits and that kind of thing. So that's not inspiring any social change.

But in grad school, you know, we were always urged to have something -- or have work that had a strong conceptual background. So that's kind of something that I wanted to talk about because it was a personal subject.

Q So you're no longer focusing on the rape/sexual assault kind --
A No.
Q -- of themes for your work?
A No. I think my thesis was kind of the culmination of that body of work. And I'm not working with that presently.
Q And were your professors at USC -- were they aware of the subject matter that you had been focusing on in undergrad?
A Yeah. Absolutely.
Q And how did they feel about that?
A Obviously, you know, they supported the subject matter but felt like I needed to get more specific with what I was actually trying to say within my work and kind of reign it in and develop it some more.
Q Did you have communications with Professor Voros about what happened to your sister?
A I don't remember specifically. I'm sure that I talked about it because we would often do group critiques and talk about our work and the content of it. So I'm sure at some point that I, you know, conveyed that this was based on, you know, something that happened to my sister and that's why

I was interested in the subject matter.

But I, you know, didn't go in detail because no one really needs to hear.

Q And on the first page of Exhibit 17, are those examples of your artwork?

A Yes. Except for the top one is a student artwork.

Q Is a what?

A Student artwork. Someone from my drawing class did that.

Q And about the artist -- it's actually the third page of the exhibit. Is that a picture of you?

A Yes.

Q And behind you is your -- part of your thesis work?

A Yes.

Q And the next page appears to be your CV.

A That's correct.

Q Is that correct -- or it just needs to be updated for your new position? Or is there anything else that needs to be updated?

A I obviously didn't put bank teller on there because it's completely irrelevant to my desired career field. Otherwise, it, you know, looks fairly updated.

Q And the publications that are listed -- those are publications about your artwork or --

A Yes.
Q -- are those publications you prepared?
A All of those are publications about my artwork.
Q And your diversity statement -- you prepared that?
A Yes.
Q And we already talked about your teaching philosophy.

Have you sold any artwork?

A I have done a lot of -- not artwork that I made for my thesis show. I sold the drawing that's on the front of here, and then there's a matching drawing with it. I sold that.

And I've been doing a lot of digital illustration commissions especially over the holidays. I did a lot of, like, pet portraits and wedding portraits and that kind of thing for people.

Q And is your interest in being more of an artist or a teacher or both?
A Both. Obviously, if you're going to be a teacher, you have to also be a working artist as well. My goal is to work in a university teaching. I'm a little scared of that now considering some of the politics within universities. But I really enjoy working with students.

Q And what work did you do with the Sexual Assault, Violence, Intervention, and Prevention office at USC?
A I did a partnership with them where that had a kind of like an awareness month in April. So I went and talked to them and to their group about my work that I was doing. And they advertised for my show, my thesis show, within their kind of advertisement flyers and events page and stuff.

And they also had representatives come out to my thesis show in case anyone was made to feel uncomfortable or revictimized or anything like that by my work. They were there to kind of offer their services.

Q Who is Shane Cook?
A He's the one pictured in the mug shots.
Q And why did you choose him?
A Because he's the one that was involved in my sister's case and in repeated -- had repeated sexual assault charges. And so that's the deal with repeating mug shots is to convey the, you know, multiple charges he had that he wasn't ever serving any time for.
Q And why did he not ever serve any time?
A I'd like to know as well.

Q Is he still a free man today?
A Yes.
Q And has your sister tried to bring criminal charges against him or file a lawsuit against him?
A I believe so, yes.
Q Have you ever been sexually assaulted?
A No.
Q Has your sister had any other sexual harassment issues?
A I'm not entirely sure.
Q Does she currently have a lawsuit pending?
A She does.
Q And what's that about?
A I believe something to do with her school program. I don't know the full extent of it. Yeah. I don't know the full extent.

I believe it had to do with some kind of accommodations that she was supposed to receive for testing and things like that that she wasn't given that affected her ability to, you know, perform on certain tests and things like that.

That's not to say that's the full extent of it. That's just, you know, a little piece that I've grabbed from ...

Q Okay. And are you a witness in -- or have any

involvement in that litigation?
A No, no.
Q Have you reviewed the complaint in that case?
A No.
Q Do you know if your sister has asserted any similar claims to which you've asserted in this case?
A No.
Q What have you done to bring awareness to your complaints and/or generate discussion about what you feel like was done wrong in this case?
A I haven't done anything --
MS. ALBRECHT: Object to the form.
A -- to bring awareness to it besides file this lawsuit.
Q (MS. MOOSE) Have you been interviewed by any media --
A No.
Q -- about the lawsuit?
A No. I've been, like, asked to have interviews with various, like, USC, like, student news reporters. But I haven't done any.
Q Why is that?
A Because I didn't think that it was appropriate considering that I filed a lawsuit for there to be different versions of things out there.

Q Do you use social media?
A I do.
Q And have you made any social media posts about this litigation?
A I have not made any posts about the litigation.
Q Did you make any social media posts while you were in Italy?
A I think I posted some photos, and I think they're presented somewhere within the evidence that I provided.
Q Have you posted anything on social media about ICA?
A No.
Q How about the Italy trip itself?
A I posted some photos that I took with my film camera, which I believe y'all should have access to as well.
Q Any social media posts about this litigation?
A I think I just answered that. But, no.
Q I'm sorry.
A No, that's okay.
Q It's been a long day. Have you tried to have any communications on social media with anyone affiliated with ICA?
A No.
MS. ALBRECHT: Object to the form.

Q (MS. MOOSE) Have you contacted any ICA employees via Facebook?
A I don't even know who's employed with the ICA. So, no.
Q So you don't know if you're Facebook friends with anybody who has any connection with ICA?
A I don't believe that I am. I know someone that used to have affiliation with the ICA named Kety, Ketia, something like that, sent me a message on Facebook at one point.

I've had a few instances like that where people will send me messages trying to kind of, like, gather information. And I usually just ignore them because I didn't think it was a good idea to communicate about it.

Q "Gather information" about the lawsuit?
A Yeah. People will kind of be like fishing for information, like, you know, ask me questions. And I don't respond to them.
Q Do you know of anyone who has set up a fake Facebook account impersonating Professor Voros?
A No, not that I'm aware of.
Q Don't know anything about that?
A No.
Q And have you sent details about your case to

anybody?
A No.
Q Have you done anything to generate -- try to generate publicity about the lawsuit?
A No.
Q What can you tell me about the activist group in the art department at USC?
A I didn't really know anything about it. Like I said earlier, I had a grad student send me a message with a photo -- her name is Kellen in the art history department. She sent me a photo with the lawsuit being plastered around the building. So I received that.

I received a message from an undergrad student saying that they were trying to -- and I don't know who "they" is and I don't know what the group is -- saying that they were trying to organize -- I don't know what -- they weren't specific, which I didn't engage with.

And then I had Autumn Wertz sent me a message with a picture of the group's, like, demands or whatever. But I don't have any involvement with them.

And I didn't even know about the balloon thing or whatever else has been reported as vandalism or

what's going on until I talked with Samantha this past week, and I found out about more.

Q What about -- were you aware that I had sent a letter to your lawyer asking that you not post derogatory comments about ICA and Professor Voros?

A Yes. I believe I was made aware of that letter.

Q Okay. And you haven't -- you haven't done anything --

A Absolutely not.

Q Okay. And do you know who is involved in the group that's making the demands?

MS. ALBRECHT: Object to the form.

A No, I don't. No. There was the one girl that messaged me on Instagram. I don't know what her actual name is because her profile was private and all I could see was, like, a username. But I don't know her, and I don't know anything else.

Q (MS. MOOSE) Do you know if it has anything to do with the allegations that you've made in this case?

A I don't know specifically what their goals are or their intentions or their plans.

Q When was the last time you were physically present in the McMaster building?

A In May when I graduated. Around the time I graduated. Maybe the end of April.

Q So you haven't been there since you graduated?
A Absolutely not.
Q And do you have any friends that are currently attending USC in the art department? grad or otherwise?
A Yeah. Autumn Wertz, she's graduating this year; and Kellen Wedford, she's in the art history department -- are the only two that I have any communication with still.
Q Okay. And how about professors at USC that you still communicate with? Are there any?
A The only one I communicate with is Dr. Michelle Hardee. She's been really great with helping me out with, you know, recommendations and helping me, you know, try and figure out a career path with my degree.
Q And your attorney produced an affidavit that she prepared. What can you tell me about that?
A I'm not really sure. She didn't ever really tell me the specifics of what she had to say with that. She just contacted me at one point after she had, I guess, read the lawsuit when it was in the news and stuff and said that she knew of other incidents where USC didn't handle the complaint process with a graduate student properly. And that's all I was

aware of.
Q Is the person that she references in her affidavit you?
A I don't believe so.
Q You believe it's someone else?
A Yeah. To my understanding, yes.
Q And do you know who that is?
A No, I don't. Like I said, she didn't really -- she just asked me -- she said, "Hey, I want to do an affidavit. How do I do it?" And I was like, "Here's my attorney's contact info."
Q So that's the only conversation you had with her about that?
A Yes.
Q Do you know of anybody else who alleges that they've been harassed or harmed in any way?
A I know Jaime Meisenheimer, who is the adjunct faculty -- that she's put in some complaints. And I believe Lauren Chapman filed some kind of either police report or complaint.

I know that there was a grad student that came in this fall that put in some kind of complaint as well. I don't know to the extent.

And I'm sure Pam put in something as well. I don't know specifically what or how many things

that she's reported, but I know that there's some issues there as well.

Q Okay. And what is the basis for your knowledge about that? about these allegations?

A I've been told about them from grad students and from the people themselves.

Q So tell me who you've had discussions with.

A I've talked with Jaime Misenheimer. I talked with Pam Bowers only briefly. Lauren Chapman. I talked with Autumn Wertz who is very close with Pam and Jaime.

I'm trying to think who else. That's all that I can, like, specifically remember right now. If I think of anything else, I'll let you know.

Q Okay. What discussions did you have with Pam Bowers?

A I just kind of had, like, an in passing discussion with her at an event for Jaime. I think it was her birthday or something. And she just kind of just, you know -- apologetic to me about the situation in Italy and kind of mentioned that, like, I wasn't alone with that and that she was, you know, had some stuff going on as well.

Q Anything else?

A No.

Q Did she elaborate about what stuff she had going on?
A I didn't ask.
Q How did you get the divorce degree from the Voros' divorce.
A I just -- what do you mean? How I found out about that?
Q Well, you produced a copy of the divorce decree. And I'm just wondering if your lawyer got that or if you got that.
A I'm assuming Samantha got it.
Q Okay. I just didn't know if somebody had given it to you.
A No, no.
Q If Pam walked up and said, "Here's my divorce degree."
A No. That would be weird.
Q It would be.

MS. MOOSE: I want to mark this.

(Defendants' Exhibit No. 18 marked for identification.)

MS. ALBRECHT: It's just pictures. I was getting nervous that -- this was a thick packet.

Q (MS. MOOSE) Can you identify what's been marked as Exhibit 18?
A Yes. So some of these -- that's my Instagram

profile. That's a thermostat. Instagram profile. Instagram profile. Still Instagram.

Q That's your Instagram?

A Yes, this is my Instagram, which is still public. This looks like David's Instagram. I believe I have him blocked, so I don't frequent this or this.

Q I think you -- I think those have Dunavant stickers at the bottom?

A Dunavant stickers? This?

Q Yeah. I think y'all produced -- did you produce that?

A I mean, it might have been produced -- I don't -- like, I'm aware that there's an Instagram account here. But I didn't frequently look at it.

Q Okay. Well, I just didn't know if you printed that or not off the Internet.

A And that's my Pinterest account, which is also public. That's a picture of one of the rooms that I had to clean out. That's a super zoomed in picture of it.

Q Okay. Could you give us the Bates number off the bottom. I know some of them are kind of small, but they should have a Dunavant number on them.

A Are you talking about these little teeny numbers?

MS. ALBRECHT: Yeah.

A I can't really see the one on the other picture. 432.
Q (MS. MOOSE) Okay. That's a picture of a room that you cleaned?
A Yeah. And then I guess the next one is a super zoomed in picture. I don't know why we're super zooming here because I can't really -- I can't tell with this picture quality.
Q Basically, my only question about this -- are these the pictures that you took while you were in Italy? Or where did these -- did you print these off the Internet or where did you get them?
A This one looks like it's from the Internet. That's not my picture.
Q Can you give us the number on that?
A 435. And I don't believe this is my picture, 436. The following pictures are mine. And then they go onto the ones -- the grainy ones are the ones I took with my phone camera that are also on my Facebook. There's a picture of the room I slept in the first night before I moved rooms.
Q What number is that?
A 119. That's literally, like, my first evening there. So that's obviously before I had any issues.

The next one is a giant lemon.

Q And I don't want you to have to go through all the pictures.

A Yeah.

Q I just want to know -- in this stack, are these all your pictures or your social media? Or is there something in here that was printed off by somebody else?

I will represent to you that it's my understanding all of these were produced by you.

A They were -- but, I mean, some of these are from, like, the Internet.

Q Okay. Well, that's what I want to confirm.

A And not my personal photos.

Q Which ones are not yours?

A These, like, last few of people -- a bunch of people in Monte Castello are not mine. They're from the Internet.

Q But you printed those off ICA's website?

A I'm not sure where they came from specifically.

Q So is that the last three pictures of this exhibit?

A Yes. Those ones aren't mine.

Q And then the ones after your Instagram posts -- these two? Were these printed off the Internet?

A Yes.

Q And were they printed off by you?
A Yes. Or my mother.
Q For what reason?
A I'm not sure specifically. But the rest of these photos of, like, the labor that we did -- those are mine that I took.
Q Is this picture, 142 -- is a picture of you. Was this taken in Italy?
A That was when -- the first day we were in Rome before there was any, you know, issue going on. But yeah, that's me. That's a selfie.
Q So tell me exactly what degree you were planning to get from USC when you enrolled.
A A master's of fine arts with a concentration in painting.
Q And what -- what is the requirement for getting a concentrating in painting?
A You have to have a certain amount of class credit or hours within a certain field.
Q And you did not --
A And I was not --
Q -- get enough hours?
A Not in painting. It wasn't possible without taking David or Pam's classes.
Q So how many hours did you have to have?

A I believe it's like 30. I'm not entirely certain since I've been removed from it for some time. But I wasn't able to get that amount. So my degree currently doesn't have a concentration.

MS. MOOSE: All right. I believe that's all I have at this time. Thank you.

MR. WLODARCZYK: Take a break?

MS. ALBRECHT: Sure.

(Off the record at 6:45 p.m.)

(Back on the record at 6:52 p.m.)

(Defendants' Exhibit No. 19 marked for identification.)

EXAMINATION

BY MR. WLODARCZYK:

Q Ms. Dunavant, my name is Damon Wlodarczyk. I represent Professor Voros in his individual capacity. I apologize, but my Sudafed has worn off yet my tongue is still numb. So if I ask you a question and you don't understand it or it doesn't make sense, please let me know. One of the good things about going last is most of the questions have been asked and answered. One of the bad things is I haven't spoken with any regularity for the past nine hours, so bear with me if my -- if it takes me a second or two to get going.

I have what's been marked as Exhibit 19 to

your deposition. And I know you've been asked questions about the Facebook exchange between you and your mother.

A Yes.

Q Have you had a chance to review Exhibit 19 just in general to identify that that's, in fact, the exchange between you and your mother?

A Yes.

Q What I have not seen is any exchanges between you and any other friend about what took place in Italy. Is -- did you communicate with anybody via text or email or Facebook message with a BFF or roommate or boyfriend regarding what was going on in Italy when you were in Italy?

A No. Just my mother.

Q What about your sister? What's your relationship with her in terms of how close you are?

A Oh, we're very close. But with the kind of, you know, spotty Wi-Fi and cell service, I was more directly communicating with my mother.

Q Okay. And what -- I don't know exactly how many messages there are, but I did personally number what I put together that was produced by your attorney. I got 70 pages of Facebook messages that go from May 5 when you -- basically your first day

in Italy, full day, to when you were departing the airport on May 17.

Are you saying that during that period May 5 though May 17 you did not have any other messages of any sort with any other person in the United States regarding your trip?

A I believe that I messaged Julie Hamer, but only briefly. Not really -- I didn't message her after, you know, we were having any issues or anything. I only think it was kind of like a "How's Italy?" "Good." That's it.

Q And Ethan was your boyfriend at the time?

A No. He was a previous boyfriend. We kind of remained friends, but we didn't have communication really while in Italy.

Q I saw some messages in here between you and your mom where you were discussing about Ethan moving to South Carolina or moving in together? What was that about?

A Ethan was someone that I met while in Texas. He was friends with a mutual friend that I had went down there to kind of spend time with in between my time in undergrad and then starting grad school. And he still lived in Texas, so that's why we kind of broke off the relationship because neither one

of us wanted to move. And she was kind of joking with that. Like, "When's he going to move?" type thing.

Q And so did you have a boyfriend at this point in time?

A No.

Q Did you have a roommate in South Carolina at this point in time?

A Yes, I did.

Q Who was your roommate?

A For my first year of grad school, I lived with a girl named Jen Simmons, and I lived in Tapp's Building on Main Street actually with her.

Q Tapp's Building?

A Yeah. Tapp's which is part of Capitol Places.

Q And were you -- when you came back on May 17 to the States, did you remain in Myrtle Beach until the school year started, or did you come back to Columbia?

A I remained in Myrtle Beach until, I believe, in, like, June I came back with my mom to kind of look for a place to live for the following year and meet a new roommate because me and my old roommate were parting ways.

Q Did you discuss any of what happened in Italy with

any of your friends back in Myrtle Beach until you came back to Columbia in June?

A No. I don't really have any friends that are still back in Myrtle Beach.

Q Did you have any discussions with your sister once you came back from Italy about what occurred there?

A Yeah.

Q Was that just a -- by telephone? by email? by text? How would you normally communicate.

A Probably in person with her. I spend a lot of time coming back and forth between Myrtle and Charleston when I can because she lived in Charleston.

Q And I know that the Facebook documents that your attorney has produced in discovery shows an exchange of Facebook messages between you and your sister starting in -- I think it's September 2018. But there's nothing before that.

Were those deleted, or just not produced?

A I don't think they were deleted because when I, you know, produced my Facebook information, I downloaded everything that was -- I was asked to download. I just clicked download. And Facebook did kind of pop up a thing about some kind of privacy notice where, like, all my message data wouldn't be able to be printed. But I don't

typically message Nikki on Facebook Messenger. Sometimes we'll send back and forth, like, videos or memes, but we don't typically have discussions on there.

Q Okay. Do you know where Corey Unthank is now aside from just Columbia? Do you have a specific address?

A Who?

Q Oh, I'm sorry.

MS. ALBRECHT: Oh, wow. You've had a lot of SCDC cases lately. Just the director of HR for a State agency. Really close, though.

MR. WLODARCZYK: Told you it's been a long day.

Q (MR. WLODARCZYK) Yeah. Cody Unkart.

A Okay. No. I don't know where he currently resides on. I know where he lived when he was -- when I was still a student here. I don't know what the specific street is, but it was in Cayce kind of near the river.

Q When's the last time you had any conversations with Antonio Griffin?

A Gosh. Maybe fall of 2017. I didn't really run into him too much because he's an undergraduate student.

Q If you want to pick up the Exhibit 19 there, we can try to hit through this fairly quickly. As you see on the bottom right, there's numbers 1 through -- and then the last page is 70. And I will represent that however this was assembled in this document is not in any type of chronological order. It may jump back and forth.

So I'm just going to ask you about some specific messages.

A Okay. That's helpful.

Q Okay. If you go to page 5, and I would represent that -- it appears the conversation starts at the bottom -- this is, like, a May 5 conversation. And I'm guessing since it starts at 10:25 p.m. and the top is 10:26 p.m. that the most current would be at the top.

A Yeah.

Q Just read through that page. My question is simply -- it appears that you're talking about David, and I know this was asked previously, and that you say, "Oh, yeah. I'll say he does make sure we are fed and watered. Laugh out loud." And then the next message following that would be "He brought me extra blankets." And then the next message was to your mom saying, "How is Cody?" and

then you respond, "He's good."

Would that be accurate?

A Yes.

Q Okay. And I think there was a question previously that you didn't know if David was the one that brought you blankets or Cody. Would you agree, though, that if you were talking about David up through the blankets and then your mom asked about Cody and you respond, you probably weren't saying that Cody brought you blankets?

A Yes, correct. I see the order now that it's going upward.

Q And some of this is just clarification.

A Yeah.

Q Because I had the opportunity to sit --

A Absolutely.

Q -- here and listen to everybody else.

If you go to page 13, and it seems like there's a message from your mom May 10 -- it's the middle of the page -- at 6:40. It says, "It's not cool at any age for David to treat Alex different." Would you agree with that?

A That's what it says, yes.

Q Okay. And then you go up two more to your response. "David always make sure her glass is

filled too"; correct?
A Correct.
Q If you'll go to page 15, middle of the page, your mom is sending you a text. That's May 10 at 6:44 p.m. It says, "Don't work harder than everyone else. Are you eating?" And then you respond, "Yeah. I'm fed. Also bought a couple of snacks"; is that correct?
A Yes.
Q Okay. And if you go to the very next page, page 16, I think you discuss that 3:12 a.m. text where you're discussing about the painting that you're having to do.
A Yeah.
Q And that's when Alex gets up this morning is, like, and you quote, "You guys -- we need to work faster and get this painting knocked out because it's getting kind of annoying." And that was like, "If David wants it done any faster he can do it his damn self. And she made a face at me and said no. But meanwhile she laid in bed all day yesterday and didn't paint because she was hung over as fuck"; is that correct?
A Yes.
Q And below that you say, "I hate Alex so very much.

Bitch"; is that correct?
A That's correct.
Q I think I'm much more frank on the record than my co-counsels.
A That's fine.
Q And, again, I think you've discussed this. On the next page, on 17, at the very bottom, it's talking about how apparently Alex and David -- and it says, "She" -- but since there's only two women, you and Alex, I'm presuming it's Alex -- "and David for most of the day together grocery shopping and other errands. Like, bitch, shut up"; is that correct?
A Yeah. That's correct.
Q And then above that a couple -- two messages above that you talk about how Eros and Alex keep ditching you in the museums and stuff, and so you talked to Eros mostly. Is that correct?
A Yes. When we'd travel, I'd kind of hang back with Eros because everyone else would kind of go off their separate ways.
Q Above that your mom is sending you an email about speaking up to David and document quietly and don't say anything about documenting.

And then it goes on -- below that where it says, "Sorry. But I would only work to Alex's

degree too. She's in ED hung over. You be in bed sick." Perhaps EG and not ED?

MS. ALBRECHT: I think it says "in bed."

Q (MR. WLODARCZYK) Oh, "She's in bed hung over. You be in bed sick."

So basically your mom appears to be saying, "Don't work harder than Alex. If she's not doing the work, you don't do the work. If she's in bed hung over and you're sick, you should be in bed sick." Is that an accurate kind of understanding of what that states?

A Yeah.

MS. ALBRECHT: Object to the form.

A Kind of summation.

Q (MR. WLODARCZYK) I mean, it says what it says.

A Yeah.

Q I'm just trying to get the idea.

A No, I understand.

Q That seems to be the issue; is that correct?

A Correct.

Q Now, if you go to the next page, on 18, if you see there's a message from your mom on 6:18 a.m. And it says, "Who is Eros?" And above that, "He's like the manager of the school thing here. David's boss basically."

Would you agree you said that?
A I'd agree I said that. But I would say that I, you know, later became aware that David was the owner of the ICA and that Eros worked for him.
Q After you returned from the Italy trip?
A Yes.
Q Okay. So while you're in Italy, you think Eros is the man in charge?
A I don't necessarily think that he's the man in charge. But I think he had a lot more direction and sense of organization than David did.
Q Okay. But you say in your message that not only is he the manager of the school but he's David's boss basically; is that correct?
A That's what I say. But that's not my understanding.
Q Okay. Well, did you explain or did you ever express any concerns that you've discussed here today with Eros at any point in time during your Italy trip?
A Yes. I actually --
MS. ALBRECHT: Object to the form.
A -- emailed him when we were stuck in Terni asking him about how long it would take for us to get back to Monte Castello because we were stuck and David

wouldn't pick us up.

Q (MR. WLODARCZYK) And that's where you got the 30 minute approximate -- you thought it took 30 minutes versus what you believe Professor Voros told you?

A That and also we map -- GPS'd it.

Q Okay.

A The distance as well.

Q But that aside, anything with regard to your involuntary servitude, your forced labor, and all these allegations about how hard y'all are being made to work, did you ever discuss any of that with Eros?

A No. Because he wasn't really, like, around while we were doing the labor. He would kind of pop in and then leave.

Q Okay. But you saw him throughout this trip; correct?

A Yes.

Q Okay. Did you ever express any concerns to him throughout this entire trip about what you were experiencing?

A No. I didn't express concerns until after the Rome incident or coming back from Rome to anyone.

Q Above that your mom says, "And tell Cody to stop

being a dick. Speak up."

What's Cody doing to you on May 12 or around there that is causing your relationship to flounder or your friendship?

A I think she's just referring to the fact that he had concerns about our labor and working conditions but he wouldn't, you know, speak up or kind of voice those as well.

Q Okay. I've read this so many times. I have never seen you in this exchange discuss the labor conditions with your mom until after the Rome incident.

Do you know of anything that is not in these email or Facebook exchanges where you're complaining about work?

A I mean, I think there was a part where I mentioned the painting and I'm complaining about it, and also I'm complaining about Alex not having to do the work. And I'm saying I don't mind working because, you know, I'm hoping that we can go to Rome and Florence to make it worth being here.

I mentioned that I'm sick. And I believe there's a page where I'm talking about "David is basically making us paint an entire basement with brushes because it's old stone and rollers don't

work," and how Alex didn't have to do the work.

So there is actually a point in here where I am mentioning the conditions to her.

Q Yes. But you're not specifically saying anything in this exchange about what Cody is doing. I'm trying to figure out why your mom is saying, "Tell Cody to stop being a dick and speak up," when there's nothing in this exchange about what Cody is or is not doing.

A I'm not really sure specifically other than she knows that he's kind of a passive type person and that he wouldn't ever voice any concerns even though he shared them. That's the only thing that I can gather based on reading this now.

Q And your mom says above that "It's dangerous for him to ditch you. Fuck him too."

Would you agree with that?

A I wouldn't agree with the "fuck him too" part. But I see that she said that, and I do think that it's not really a good idea to split up from the group when you're in a foreign country. I think it's best to stay together.

Q Is your mom complaining because you say that you're saying that Cody wouldn't speak up about the work load or is she complaining because he left you

somewhere?
A I think she was talking about the point where we were traveling into Perugia or something, and I kind of got, like, left by the group. Everyone kind of split up, I think is what she's referring to.
Q And how did you communicate that to your mother? Because that's not in this -- any of these email -- or Facebook exchanges.
A I mean, it has to be in here somewhere. I didn't call her, I don't believe. I mean, it's possible that I talked to her on the phone, but it would have been, you know, communicated in some capacity.
Q Were you communicating with your mother in any other way other than Facebook messages and the few phone calls that we've discussed already?
A Just Facebook Messenger. I communicated with her when I was stuck in Terni. I actually physically called without -- outside of Messenger. But for the most part of used Messenger because it relied on Wi-Fi.
Q Okay. And these documents, obviously, will speak for themselves. But if there is no message where you're explaining that Cody ditched you in Perugia, would you know as we sit here today how your mom

would have that information?
A I'm guessing either there's a message that's been left out of here or there's a phone exchange or call. But there would have been no other way besides my communication with her.
Q Okay. The next page, page 19, at the bottom at 6:21 a.m. you sent a message to your mom. "We were in Perugia yesterday, and David only bought Alex this fancy hot chocolate. And I was, like, 'David, where's mine?' and he went back and got me one."
Would you agree that you said that?
A I would agree that I said that. It's right here.
Q Okay. So at this point in time, May 12, you're not having any issues?
A I'm not having any major issues. The point of that message was pointing out the preferential treatment or one small example of that kind of treatment that she was receiving.
Q Now, we move on into the Rome incident, which you've discussed. Now, you stated that Professor Voros gave you an option of having a driver come and pick you up, but it would have cost you 20 euros apiece to have that done.
A I didn't state currently how much it cost. I didn't remember. But, yeah, I think there was an

option for that to happen for someone to come get us.

But Antonio and Cody didn't want to do that. And I didn't want to ride with a stranger by myself through Italy.

Q So instead y'all ended up paying 80 euros to stay at a hotel overnight.

A We did.

Q Okay. But the representation that Professor Voros did nothing wouldn't be accurate if he did give you an option to get home; correct?

MS. ALBRECHT: Object to the form.

A He gave an option, but we didn't feel that it was a feasible option at the time. And my current summation of that is because we didn't want to pay the cost. But I think that there were things at the time that we were considering that made us not want to do that.

Q (MR. WLODARCZYK) So what I'm trying to understand is if everyone is in such a panic in Rome that they're stuck in a train station and can't get home, and the person who's leading your tour says, "I can have someone come out and pick you up. It's going to cost you this, though," are you truly panicked if you don't take that option?

A I mean, I don't believe --
MS. ALBRECHT: Object to the form.
A I'd have to look at the email specifically -- because I don't have that in front of me, and I haven't looked at it in a while -- what specifically that option was that was presented. But I imagine -- you know, you can base it on what you're saying, though, you know. We spent money on the hotel -- that if that had been a viable option, we would have taken it.
I can't recall exactly at this moment why we didn't see that that was a viable option or thought that that wasn't what we should do, but I do know that there was a reason why we refrained from doing that.
Q (MR. WLODARCZYK) Could it be that Cody and Antonio weren't that panicked and decided they'd rather sleep in the train station than spend any money?
A No, I don't --
MS. ALBRECHT: Object to the form.
A I don't believe that that was the issue.
Q (MR. WLODARCZYK) Have you read the statements that they provided as part of the investigation?
A I read the ones that were provided to the EOP.
Q Did you see anything in there where they said that

they were in fear of their safety or that they were having concerns about their trip and the Rome trip?

MS. ALBRECHT: Object to the form.

A No. But I believe that David spoke with them privately before they wrote the statements, and they were influenced before writing those statements.

Q (MR. WLODARCZYK) And what basis would you have that your friend of many years from your undergraduate would basically lie to cover up something for a professor?

A Because he's a very passive person, and David is a very intimidating person. And so I believe that kind of influenced that.

Q When did you first think that Professor Voros was an intimidating person?

A I mean, I've always kind of felt, like, there was some kind of, like, weird creepiness there, which, again, that's an opinion/assumption. Whatever you want to call it.

But I believe that based on his kind of, like, responses, you know, when I've seen him kind of talk with other professors and with students, his exchanges with other people -- he has that demeanor.

Q So at the beginning of your trip, you're telling your mom "he's cool" and "fine," which that could be interpreted one of two ways. Would you agree with me?
A Agree with you on what?
Q When you're referencing somebody that he's "cool" and "fine," but not "fine" like "fine, mom," but "fine," I think is how we were trying to say it.
A Oh, that's not how I was trying to say it at all.
Q It could be interpreted different ways. Would you agree?
A Sure.
Q What did Cody and Antonio want to do that night in Rome?
A In Rome? Or when we were stuck in Terni?
Q I thought you had to spend the night in Rome and then took the train the next morning.
A No.
Q Oh, that's right. You caught the train from Rome to Terni --
A Yeah. And then we got stuck in Terni.
Q So in Terni. What was their plan?
A Originally they just wanted to sleep in the train station. And there was a lot of people kind of wandering in and out of it, so we all kind of

agreed that that wasn't, like, the safest option. And we were all kind of gross after having traveled all day and, you know, walking around Rome.

Q Did you basically push them to get a hotel?

A I wouldn't say that I pushed them. If they didn't want to do it, they weren't going to do it. I didn't require them.

Q I'm just reading the message -- May 14 at 5:26 p.m. which says, "I was about to get a hotel by myself and be, like, fuck you guys."

So I'm trying to figure out -- that seems to be, like, there was a line in the sand at some point where --

A Oh, there was a line in terms of -- I was going to go to a hotel. There was never any "you have to come with me." I was, you know -- "this is what I'm doing because I feel more safe doing this. If you want to come, great. If not, also great." But I was not sleeping in a train station.

Q If you would go to page 25. And you sent an email -- or you sent a message at 6:05 p.m. It says, "I sent David an email. I know it goes directly to his phone and notifies him. It may have been slightly rude, but I don't even care."

Do you agree?

A That it was slightly rude -- after rereading it, no. But I agree that I said that at that time.
Q Do you know what the work relationship was for Alex between Alex and ICA?
MS. ALBRECHT: Object to the form.
A No. From my understanding from her prior to going on the trip, there wasn't a work relationship.
Q (MR. WLODARCZYK) In reading through this exchange between you and your mom, it appears that you get to Italy and everything is going well. It's cold in the rooms at night. That you probably should have brought a sleeping bag or maybe a coat.
And then Alex gets there at some point in time around the 10th, and as everybody, I think, asked you at that point the situation changes; correct?
A I think the situation -- in some respects it did change but in other respects it was a continuation of the work that we were already doing. It just -- my, I guess, irritation with it and focus on the amount of work we were doing kind of amplified once she got there and was kind of acting like a supervisor.
Q Okay. But from this exchange, would you agree with me that before Alex arrives in Italy, there is no discussion with you and your mom about the

workload?
A I would agree with that.
Q Okay.
A But I don't think that this exchange is conclusive of the actual work that we were doing. But within this exchange, sure.
Q Well, my question is were you asked to do anything that the two boys that were with you asked to do? In other words, were you all asked to do the same things in terms of performing certain work?
A Yeah. I did have to, you know, scrub cat pee off cushions. They didn't have to do that because David wanted me to put them in the laundry, and I guess that's a girl task.

But that's pretty much the only difference.

Q Well, you didn't have to do labor. You didn't have to, like, move furniture, though; right?
A I did move some furniture. But not -- they moved some downstairs. And I wasn't -- no. Not helping with this part because it's not happening.
Q Exactly. I'm always for equality until people ask me to move furniture in the office. Then I'm like -- where's all the equality when it comes to moving furniture?

All right. So you're all doing work. You're

the only one that's vocalizing that you think the amount of work that you're doing is wrong?

A I'm the only one that apparently vocalized it towards David or Alex.

Q How much money were you -- in terms of like a benefit -- how much money was your trip discounted in terms of lodging and the meals for the services that you performed?

A It's hard to say.

MS. ALBRECHT: Object to the form.

A Because David obviously gives an estimation of what the lodging expenses would have been had I been a student there and the food or whatever. But it's hard to say because he bought groceries that were split, you know, four or five ways. So that's probably a marginal expense.

And then the accommodation cost that he provides is an accommodation cost based on the fact that there's linens. It's clean, you know. There's heat in the building. There's people there providing food. That's what that accommodation cost includes as well as studio space.

And I didn't receive any of that. So I don't think that's an accurate cost for those accommodations. So I can't tell you specifically

what the cost of sleeping in a pee-infested building is.

Q (MR. WLODARCZYK) Did you sleep on the pee?

A Yeah. Because it was on the mattresses, and it ended up on my blankets.

Q Did you tell your mom about that?

A I told her after a certain point. And when I brought back blankets that I had in Italy, there was pee all over the blankets.

Q Were those blankets that David brought over to you, or were those your blankets?

A Those were my blankets that I put on the beds on the rooms there.

Q Okay. But your complaint alleges that you didn't have linens or blankets.

A I brought blankets.

Q Okay. Because you were told to bring blankets; correct?

A I was told to bring a sleeping bag, and we brought -- most of us brought blankets.

Q Were you jealous of the way Professor Voros and Alex's relationship was in Italy?

A No. I thought it was weird.

Q Okay. But you were jealous of the fact that she was supervising you and wasn't having to work as

much as you working --
A Did I state in my message that I was jealous?
Q Were you upset? Were you concerned? Were you mad?
A I was -- sure. I was concerned that she was not having to do any work. And I thought it was weird that David had some kind of, like, fixation on her.
Q Okay.
A That included the preferential treatment.
Q But if she's not a student and their relationship is not the same as the three students who are going over to perform services, what's the discrimination?
MS. ALBRECHT: Object to the form.
A I don't know. It was my understanding that she was going over there to do the same duties that we were.
Q (MR. WLODARCZYK) What if you understanding was incorrect?
MS. ALBRECHT: Object to the form.
A It's what I knew based on what was communicated to me from her.
Q (MR. WLODARCZYK) Okay. What about from Professor Voros?
A He never communicated the relationship with Alex.
Q And to this day, you don't know what the

relationship was, do you?
A The work relationship? No.
Q Correct.
A I do know that she is now adjunct faculty. Right after the trip, she was adjunct faculty.
Q And regardless, she wasn't a student when she went on the trip?
A No.
Q Did anybody ride with you in the car after the fallout when you got back to Monte Castello?
A No. Just me and the random Italian dude.
Q Okay. Where was Professor Voros and Alex and Corey and Antonio?
A They were all in David's vehicle.
Q Right behind you? In front of you?
A In front.
Q Okay. So you all drove essentially together back to the ICA?
A They got there -- I don't actually know because I couldn't understand what the Italian guy was saying. But I, like, arrived at a different section. I think behind where the school building is.
Q Okay. But were they already there about the same time?

A I think about the same time, or they were already there.
Q Did you make a phone call to your mom on the side of the road while you were having -- following the argument with Professor Voros?
A Yes.
Q And specifically what did you tell your mom about anything he said or his -- the way he was acting?
A Well, clearly she kind of knew and I had communicated with her about being stuck in Terni and my concerns there. And then when we talked on the phone, I communicated, you know, the conversation, I guess -- that's a polite way of putting it -- the conversation that had transpired outside of David's car.

I mean, she knew that we were walking up the hill.
Q Okay.
A So I was trying to keep her updated with the situation that was going on because she was already concerned at that point.
Q I mean, did you tell her that you felt physically threatened or in danger at that point in time?
A Absolutely.
Q Okay.

A I don't know if it was those specific words, but, yeah, I did tell her that I didn't feel safe. And that, you know, "Hey, I'm on the side of the road here, and I'm trying to figure out what to do."
Q Well, there's a big difference between "I don't feel safe" and "I feel like someone might physically harm me."
Would you agree with that?
A Sure.
Q So did you communicate to her any concerns about a physical assault or physical attack or any type of action against you at that point in time?
A I communicated with her that I was alarmed by David's explosive anger and that it could turn into who knows what because it was so explosive and I don't feel like it's a stable person's reaction to the situation at hand. And then, you know, getting in a car with a stranger is also not really ideal in terms of, you know, being safe.
Q Were you on the phone with her when you were in the car with the stranger?
A Yes.
Q So you were on the phone with your mom the entire time?
A Yes.

Q Okay. As you were all collectively in two cars going back to the facility with someone that Alex apparently knew to give you a ride; right?

MS. ALBRECHT: Object to the form.

A Yes.

Q (MR. WLODARCZYK) When you were allegedly being berated by Professor Voros, was Antonio and Cody also present?

A Yes.

Q So if they denied that that took place, are they lying?

A Yes.

Q And do they have any reason to lie in your opinion now that the fact that they are not -- no longer --

A I don't think that they --

Q -- graduate students?

A -- have reason to lie now, but I think that they did then.

Q They have reason to lie now?

A Not now. But I think that they did then. I think they had reason to -- that they were being quiet or their statements that they provided to EOP.

Q So if we depose either of those individuals and they disagree with your version of what happened, you're saying that they don't have a reason to lie

now so that their statement under oath will be truthful?

MS. ALBRECHT: Object to the form.

A I believe it would be truthful. I mean, I haven't spoken to Antonio or anything. I don't know what his opinion is. I know it differs from Cody's because, again, he felt indebted to David who paid for his flight and made it, you know, financially possible for something that someone of his, like, income level wouldn't have been able to do otherwise. So he was very, just, like, grateful and indebted. And no matter what happened, he would have never said anything negative towards David even if he believed the work conditions and things were inappropriate.

Q (MR. WLODARCZYK) That's Cody?

A Antonio.

Q Antonio. So you believe Antonio felt indebted to Professor Voros?

A Absolutely.

Q You also, I think, referenced him as a religious type?

A He is religious. Yes.

Q Okay. Do you think religious types will generally lie to serve somebody else's needs?

MS. ALBRECHT: Object to the form.

A I can't say what religious types would do or not do. Everyone is a different person.

Q (MR. WLODARCZYK) So what I get is everybody involved in this case from the time you landed in Italy to the time that you finished up your complaint with USC is basically lying to protect Professor Voros?

MS. ALBRECHT: Object to the form.

A I think that's a very -- what's the right phrase? -- general summation.

But I do think that people have been only telling partial truths to serve David's purposes, yes.

Q (MR. WLODARCZYK) And what was David's purposes?

A That's hard to say specifically. I don't know what his situation is. I think benefiting himself is his primary, you know, goal. And the ICA is his business that he, you know, owns and was profiting from. And his purpose was to kind of have that program take off and seem like it was a success.

And that's why, I mean, ultimately he needed us there to be the labor to set up that program and try to, you know, keep that reputation up. So I believe his motives were very just self-serving.

Q Did he take you out to dinner as a group?
A We went -- one time during one of our travels we went to like a pizza place.
Q The rest of the time you ate in the facility?
A The only other time, I believe, we ate out was at the home of these two artists.
Q Now, you went to Rome on the 14th. I think we've established that. You stayed over in Terni. You came back on the 15th. You had the blowup on the road. You stayed at the facility the 15th. The next morning you got up. Apparently you went to check to see if the town had anything open for food, and there was nothing open. And then sometime in the afternoon or evening of the 16th, you were put up in a hotel and had dinner at the hotel --
A Late that evening, yes.
Q Late that evening. Okay. And then you left on the 17th?
A Yes.
Q Okay. Would it be accurate that you didn't do any work at the ICA on the 14th, 15th, 16th, or 17th?
MS. ALBRECHT: Object to the form.
A Yes.
Q (MR. WLODARCZYK) Okay. You were also talking

about the day trip to Perugia.

Did you do any work that day at the facility?

A Yes.

Q Do you recall what you did?

A Just the same types of labor we had been doing. The painting of the basement downstairs room was a more-than-one-day task.

Q Okay. But it wasn't nine hours' worth of work if you obviously took a day trip.

A Just that day. Most of the days we didn't take day trips. The day trips were kind of very spaced out. Some days were just completely all working.

Q And did you take any other trips besides the Rome trip that basically went from the 14th through your leaving on the 17th. The day trip -- any other day trips?

A We went to Assisi as I mentioned before. I think that's where his artist friends were located. Just outside of that.

Q And so obviously you didn't do a nine-hour workday --

A No. We didn't do the whole day. We did part of the day.

Q So I got two day trips and then the 14th, 15th and 16th -- five days. And how long were you there?

You were there from the 5th to the 17th?
A Yes. Almost two weeks.
Q Okay. Well, 16th. Because the 17th you would have left.
A Yeah.
Q So 11 days you were there with the possibility of work; correct?
A Correct.
Q Full day of work. And did you do a full day hard labor on the 5th? the very first day you were there?
A No. I think we did a full day of work, but I don't think at that point we were doing anything strenuous yet because we had just got there and were kind of assessing what needed to be done.
Q This is the same facility that the full paying participants of the program would stay at; is that correct?
A That's correct.
Q So it's your opinion that that facility was not up to full paying participant standards?
A Absolutely not.
Q But you said you never had been in Europe or out of the country before?
A No.

Q When you traveled within the United States, did you ever stay in a youth hostel or cabin or any other thing other than just a regular hotel?
A No. But the ICA --
MS. ALBRECHT: Object to the form.
A -- is not a youth hostel.
Q (MR. WLODARCZYK) But your experiences are basically limited to United States hotels in terms of when you travel and stay at a place?
A I've stayed at Airbnb places and things like that as well. And I stayed -- when we were in Rome, we stayed at a, you know, hotel place there.
But, yes, primarily limited to hotels. No hostels. Nor did I think that -- the ICA, which is supposed to be this amazing art program that USC sends its students to, is not listed as a youth hostel.
Q Do you know what the structure actually was that you were staying in?
A The structure?
Q Yes. The ICA, the building that you were staying in, do you know its historical background?
A No. I'm sure it had some since it's in an old village. But that doesn't excuse any of the conditions that were in there.

Q Are you aware of any other of the 200 and some odd participants over the years that had any complaints about the conditions at the ICA?

MS. ALBRECHT: Object to the form.

A I haven't spoke with anyone from the ICA.

Q (MR. WLODARCZYK) Have you contacted any prior or post participants of this trip to find what their experiences were like?

A No.

Q Have you talked to President Pastides about his experience while staying at the same facility you were?

MS. ALBRECHT: Object to the form.

A No. I don't think any student directly talks to Pastides without some kind of special appointment.

Q (MR. WLODARCZYK) Do you find that unusual?

A No.

Q That exchange where you're talking to your mom about Alex and her not working, in layperson's terms, would you be bitching?

MS. ALBRECHT: Object to the form.

A Would I be "bitching"?

I'm going to say no because I don't really know what "bitching" is. Am I complaining? Am I just having a casual conversation where I'm

expressing some concern? Sure.

But "bitching" is not in my normal vocabulary. So I'm not going to ...

Q (MR. WLODARCZYK) Well, I'm just curious when Professor Voros allegedly -- the basis of your entire complaint is he said that you "bitch" or "all you've been doing is bitch" or whatever that -- the actual expressed term is.

What did you understand that to mean?

A I think when you said -- like, when you just said "bitching," that kind of implies that this is me complaining without merit or without cause. And that's definitely not the case.

Is there some humor thrown in here where I'm -- you know, me and my mom are being kind of, like, smart-assed about it? Of course. But when he said, you know, on the side of the road that "all I do is bitch," I don't really think that that was an accurate statement.

I did a lot of work while I was there, and I'm a pretty quiet person generally. So I don't, you know, typically voice concerns or complain. You can, you know, ask other students or other professors. I'm fairly quiet.

So, no, I don't believe that all I did was

bitch or that my experience there could be characterized by me bitching.

Q And that's your opinion of yourself?

MS. ALBRECHT: Object to the form.

A Of course. And I think it could be validated by others.

Q (MR. WLODARCZYK) By who?

A By --

MS. ALBRECHT: Object to the form.

A By other grad students or other professors that actually I had a good working relationship with.

Q (MR. WLODARCZYK) What about on this trip?

A On this trip? I don't really think that's a fair way to validate my personality. Because, you know, Alex isn't a super fan. David is obviously not a fan of me at this point. Cody and Antonio, I think, still have positive opinions of me as well. They never said that I was bitching or complaining. And you can see that in some of the statements that they made.

Alex is the only one, especially in the statement to the EOP, that accused me of not working or complaining.

Q Antonio and Cody, though, just stopped hanging around with you; is that accurate?

A No.
MS. ALBRECHT: Object to the form.
Q (MR. WLODARCZYK) Wasn't that what you were telling your mom? that they were leaving you and ditching you?
A What I was saying was when we were in the museums that they kind of, like, all wandered off on their own. Or Alex would, you know, go off with Cody and kind of wander that way. She went to Coastal Carolina as well.
And so I was kind of left alone with that. But, no, they didn't stop hanging out with me because my behavior was a problem. That's inaccurate.
Q Again, that would be your opinion of yourself; correct?
A No. That would be an actual fact that they didn't stop hanging out with me.
Q Your undergraduate focus was on sexual assault?
A In undergrad you don't really have a focus. But for my, like, senior art exhibition, which is like a semester-long project, yes.
Q Professor Voros never made any sexual advances to you, did he?
MS. ALBRECHT: Object to the form.

A He had made flirty comments, but there was no physical action on that behalf.
Q (MR. WLODARCZYK) Okay. Would you agree that someone can make a flirty comment and not be attempting to solicit sex or sexual favors?
A Absolutely.
MS. ALBRECHT: Object to the form.
Q (MR. WLODARCZYK) So Professor Voros never solicited or attempted to solicit any sexual favors from you?
MS. ALBRECHT: Object to the form.
A No.
Q (MR. WLODARCZYK) And Professor Voros never touched you in a sexual manner in Italy, did he?
MS. ALBRECHT: Object to the form.
A He would, like, touch my leg, or he came up to me and made a comment, and it was kind of near my face about how I would, you know, how am I still this pretty after working all day in a way that I found creepy and uncomfortable.
Q (MR. WLODARCZYK) Creepy and uncomfortable. Did he touch your leg in a sexual way?
MS. ALBRECHT: Object to the form.
A I don't know how touching a leg in a way that's unwanted is different that touching a leg in a

sexual way.

But perhaps he didn't think that it was a problem.

Q (MR. WLODARCZYK) Did he touch your leg in a sexual way?

MS. ALBRECHT: Object to the form.

A I -- not going to repeat my answer to that again.

Q (MR. WLODARCZYK) Well, you pled in your complaint that he touched your leg in a sexual way.

So I'm asking you right here --

A It was a way that was unwanted and I -- that's all I'm going to say about that.

It was a way that was unwanted and made me uncomfortable.

Q Did you tell your mom?

A Yes.

Q When?

A I don't know specifically. I didn't tell her obviously right away.

Q You didn't tell her in any of those 70 pages of emails -- or Facebook messages, did you?

A I mean, you've read them. If it's not in there, it's not in there.

Q Because you didn't tell her.

A Because I didn't tell her a lot of things that

happened right away.
Q So you're complaining about Alex not doing work and how she's a bitch. But someone touches you on the leg, and in your complaint you allege it's a sexual manner, and you don't mention that to your mom in passing in a message?
A No.
MS. ALBRECHT: Object to the form.
Q (MR. WLODARCZYK) You're talking about Cody ditching you at a museum, and you're not saying that someone is touching your in a sexual manner?
MS. ALBRECHT: Object to the form.
A No.
Q (MR. WLODARCZYK) You do an entire complaint process through USC, and you don't even mention once of anything of a sexual nature, do you?
MS. ALBRECHT: Object to the form.
A No.
Q (MR. WLODARCZYK) Because it didn't happen, did it?
A It did happen.
MS. ALBRECHT: Object to the form.
Q (MR. WLODARCZYK) It did happen?
A It did happen. But my focus of my complaint was more of the fact that the treatment that I received and the labor and the way that I was left on the

side of the road.

And then USC not handling my complaint at all and the -- just like the type of labor that -- just because that's not what I focused on originally because -- doesn't mean that it's not true.

Q So you're all worried about this labor issue that you never speak about, but you allege that he's touching you on the leg in a sexual manner, and it doesn't come up until you filed this lawsuit?

MS. ALBRECHT: Object to the form.

A Yes. I believe you're basing all of your stuff on what you call as bitching; and if it's just bitching, then it's not really conclusive of everything that occurred.

Q (MR. WLODARCZYK) Well, I'm also asking the fact that you filed a complaint with the University of South Carolina with all of this documentation and all of these letters, and the only thing that's in there is that you were called a bitch.

MS. ALBRECHT: Object to the form.

A And that's incorrect.

Q (MR. WLODARCZYK) Is that correct? Is that what's in your complaint?

A I wasn't --

MS. ALBRECHT: Object to the form.

A It's in my complaint. But that's not what I told to Carl Wells.
Q (MR. WLODARCZYK) Did you ever put anything in any of that documentation in the entire appeal about anything of a sexual nature?
A No.
Q Because it didn't happen?
MS. ALBRECHT: Object to the form.
A No. That's not what I'm saying.
Q (MR. WLODARCZYK) You would have put it in there if something of a sexual nature happened, wouldn't you?
A No. You don't know that.
MS. ALBRECHT: Object to the form.
MR. WLODARCZYK: What is inappropriate about my question?
MS. ALBRECHT: She's already answered your question. You've asked it over and over and over again.
THE DEPONENT: I think you're just asking in hopes that you may intimidate me into changing my answer. And I do not wish to comment on that any further than I've currently commented on it.
Q (MR. WLODARCZYK) Well, let me ask you this: Did you read the article about this lawsuit from

The State newspaper?
A I did.
Q Did it say -- did you read where it said that Professor Voros was alleged that he made sexual advances towards you?
A I did read that.
Q But as we sit here today, you can't say with any certainty that any sexual advances were made to you; correct?
A Not by your definitions, no.
Q By what definition was a sexual advance made to you?
A I explained to you the leg touching thing and the comments, and you don't consider that any type of, like, harassment or unwarranted behavior. So I think our definitions kind of don't match. And that's all I can say to you at this point.
Q So that's the only thing of a sexual nature that may have occurred during this trip was that he touched your leg on one occasion and got close to your face on a second occasion?
A Yes.
Q That's it?
A Yes.
Q Some we're not going to show up at trial down the

road and you allege that some other action took place?
A No.
Q You're not going to say that he solicited or attempted to get sexual favors from you?
A No.
Q Okay. So the only thing that -- just to confirm -- the only thing that you allege that could have been inappropriate, based on your perception, would be that he touched your leg on one occasion and he got close to your face on a separate occasion?
MS. ALBRECHT: Object to the form.
A Yes.
Q (MR. WLODARCZYK) Who was present when he touched your leg?
A We were at a dinner table, and everyone had been drinking.
Q Which --
A Cody, Antonio, and Alex.
Q Alex, who he was having a relationship allegedly at that time?
A Yes.
Q Did you say anything to anybody?
A No.
Q Was it a lingering issue, or just where there was a

touch on the leg and that was the end of it and moved on?

A It wasn't necessarily a lingering issue. No.

Q Okay. So he didn't have his hand on your thigh and just leave it there or anything like that?

A I mean, you said, "Was it a lingering issue?" or "Was it lingering action?"

It was a lingering action. That's why I felt uncomfortable. But it wasn't a lingering issue. So to clarify that.

Q So how long was his hand -- how long did it touch your leg?

A I don't know. I didn't specifically count the seconds.

Q Okay. And you had been drinking as well?

A A few glasses of wine, yes. We typically drank with our dinner.

Q And could your perception of the situation have been affected by alcohol?

A Yes. But so could David's perception of the situation.

Q Okay. Did he say anything after the touch or during the touch?

A No.

Q Okay. Did you make any comments to anybody at that

point in time or thereafter about the touch?
A I made a comment to Cody at one point. And Cody also commented on David's behavior as well.
Q Okay. So and that was that night?
A It was that night and another night as well.
Q Okay. So Cody is going to be the one to verify that you had a discussion about that situation?
A Yes.
Q Do you recall when it happened?
A No, I don't recall specifically.
Q Obviously before the Rome trip?
A Yes.
Q And Alex didn't get to Italy until I think you said the 10th. So sometime between the 10th, 11th, 12th, or 13th.
Would that be accurate?
A Sure.
Q And what the -- where he got close to your face? When did that occur?
A I don't remember specifically. I think it may have been before Alex got there.
Q In what context was that in?
A We were cooking in the kitchen.
Q Did you have something on your face?
A No.

Q And what did he do specifically?
A He just kind of like touched my face and was kind of like, "How do you look so pretty after working so hard all day?"
Q And was anybody else present at that time?
A I believe Cody was in the room.
Q And did you have any conversations about that with anybody?
A Just Cody.
Q Okay. So Cody knows about that incident as well?
A Yes.
Q Now, Cody gets under oath in his deposition and says he doesn't recall any of that, is he lying? is he forgetting? What's your opinion of that?
A If he doesn't recall it, then he's forgetting. I wouldn't say that he's lying. I'd say that he's forgetting.

MR. WLODARCZYK: All right. I don't have any further questions.

MS. ALBRECHT: All right. Why don't we take a quick break if that's all right with everybody so I can try and get this in order.

(Off the record at 7:44 p.m.)

(Back on the record at 7:50 p.m.)

/////

EXAMINATION

BY MS. ALBRECHT:

Q I just have a couple of questions I want to go back through and try and make sure that I've clarified some things.

We discussed earlier that once Alex had gotten to Italy you felt like David had some sort of obsession with her, I think is the word that you used.

Did you see that right away?

A Yes.

Q What gave you the impression that Alex and Professor Voros had some sort of intimate relationship?

A I mean, based on, you know, kind of seeing them act intimately together, the treatment -- the kind of, like, preferential treatment towards her, kind of their interactions together were very, like, familiar and intimate which kind of led to that idea as well.

Q Can you explain the circumstances -- when the statement was made by Professor Voros to you that "if you acted more like Alex you would get to go on more shopping trips" or "you would get to -- you wouldn't have to work as hard."

What was it exactly that he said? and where were you?

A I think at one point I had kind of mentioned that, you know, she didn't have to do the same amount of work. I don't remember it was specifically to her or to David. But at a certain point, he claimed that, you know, if I acted more like Alex -- or I don't know specifically what he was saying that in regards to, whether it was, you know, their type of relationship that they had. That's the only thing that I can assume -- or I don't really know -- that if I acted more like her that I'd, you know, get treated more like how she did.

And I assume that meant, you know, not having to work as work, going on the shopping trips. You know, being excused from, you know, the rest of the group.

Q Did you have any knowledge of whether or not David and Alex were in an exclusive relationship?

A During my time in Italy?

Q Yes.

A I mean, I believe that they're -- obviously based on what I, like, witnessed, I believe that there was a relationship. I guess it was not exclusive since they were both married.

Q When you started sending messages to Magdalena Grudzinski-Hall -- I think I was close there -- did she make a statement to you that you should stay in your room?
A Yes, she did. She said to stay put in my room or something to that effect.
Q And was that based on the information that you had provided her about the situation in Italy?
A I believe so. I don't know if she had any other outside reason to assume that.
Q But she told you not to leave your room?
A Yes. She said to stay put.

I think she believed that, based on the situation that I described to her, that it was not really a safe situation, and the best thing would be to stay where I was.

Q Have you been made aware of various faculty members making statements about you after your complaint about the trip to Italy?
A Yes. I saw some emails. Particularly one that's coming to mind is one from, I believe, Dr. Graciano making a statement about my behavior or, like, character or something. I don't remember specifically which email it was.
Q Was possibly calling -- saying that your persona is

two-faced and disappointingly disrespectful?
A That sounds familiar.
Q Do you recall being called a problem student after your report about the trip to Italy?
A Yes. And I was definitely treated like I was a problem student.
Q And you testified earlier, I think -- I want to make sure. Did you have any problems with faculty before your trip to Italy?
A No.
Q And you mentioned earlier that your goal was to be -- career goal was to teach in some capacity while also doing art?
A Yes.
Q What are the requirements as far as having a concentration to obtain teaching positions? Or what knowledge do you have about that?
A So typically -- and I think it's now, like, a strict requirement within the MFA program at USC you have to have the concentration to, you know, get that experience in that area that you'd be teaching.

And usually when you apply for a job, they look for those credit hours to teach in that position. So if I wanted to do painting, a lot of

the positions will post that you need this many, you know, graduate credit hours of, you know, whatever type medium you're applying to teach.

Q Do you have -- even though you don't have a concentration, do you have enough credit hours in painting to be qualified for those positions?

A No. I would have to have a university or tech college or something have me come in and teach intro classes, and then, you know, like, my work abilities or my students' work -- and then have them kind of push me forward into something like that or recommend me.

Because right now I don't have enough to teach at any higher level other than an intro foundations course.

Q Does your lack of TA'ing -- or you used another -- instructional aide experience affect your ability to get positions now?

A I believe so. Because when you submit an application, you have to show, you know, a portfolio of student work. And my portfolio of student work is severely limited and only limited to drawing courses. So all I can show is examples of drawings and not painting or other foundational classes or, you know, advanced painting of any

sort.
Q Do you know if either Cody or Antonio were under the impression that the trip was a USC trip as well?
A I believe that -- and I don't want to, you know, overspeak for them -- but I believe we all thought that it was a USC trip because of the discussion of the trip on campus during class time, you know, via USC email, and the fact that, you know, the department was also aware that we were going.
Q Do you have any knowledge about whether or not the statements that are in your EOP investigative report from Antonio, Alex, and Cody -- were they solicited by EOP or were these statements that they wrote while they were still in Italy at David's request?
A I believe that they were statements that were written at David's request and then were later recycled to be used for the EOP.
Q Do you have knowledge from any of those three -- Alex, Antonio, or Cody -- that they were interviewed by anybody at the university about your complaint?
A I do not believe that they were. Cody never mentioned that to me. He talked to me a little bit

about Italy when I came back, and he said he was not interviewed.

Q So the only information USC had from the three witnesses that were present outside of you and David is the information they sent while David was paying for their housing, meals, travel?

A Correct.

Q Did you, when you went to Italy, have any knowledge about any history of violence that David had?

A No.

Q After your incident on the side of the road on the way back from the train station in Fratta Todina, were you afraid? And you might have answered that earlier.

Did you have any fear that David might become violent?

A I think -- kind of restating what I said earlier, based on the explosiveness of his personality and what I consider to be, you know, an unwarranted emotional reaction -- I believe that's a very real possibility.

Q Do you know anything about David's relationship with President Pastides?

A I believe that they have some type of friendship. I know that he had an undergraduate student do some

kind of mural on the side of, like, the president's house or something like that, that he had a very like, active relationship in trying to get the president involved in the ICA and trying to, again, you know, promote that.

But I think that they were very friendly with one another. And I would say that their relationship is probably a friend type one.

Q Do you know if President Pastides actually stayed in the ICA facilities when he visited the college?

A I don't know specifically, but I would say probably not.

Q Do you know if David had upgraded him to an apartment in town so that he could stay somewhere nicer?

A I don't know.

Q You addressed a few people earlier today, but can you give me a list of who else has reached out to you to say that they also had problems specifically with David Voros?

A Pam Bowers reached out to me. Jaime Misenheimer reached out to me. Autumn Wertz reached out to me. Lauren Chapman reached out to me. I'm trying to think if there's anyone else.

Those are the ones that most come to mind.

Q You mentioned a first name Ketia earlier?
A Oh, yeah. I think her name is Ketia.
She's a local to Monte Castello, and told me that she used to work for the ICA. She messaged me on Facebook and said that she had also had issues with David and his behavior and their, you know, working relationship, and that she felt like she was bullied or something within that town or, you know, adversely affected by his behavior.
Q Was your complaint to Carl Wells -- you had -- when you started that complaint process, were there any in-person interviews that were done with you and the EOP office?
A There was after I spoke with Dale Moore who directed me to the EOP office. I met with, I believe, in early June -- met with Carl Wells. I don't know that it was necessarily a formal interview. It was kind of just me stating my, you know, concerns and what the issue was.
I also I believe spoke with Carl Wells and Kevin Sheppard a separate time. I don't remember the specific extent of that conversation, though.
Q Did Carl Wells ask you what you felt you were discriminated on the basis of during that conversation?

A I don't recall specifically that he asked me that.
Q Do you ever recall telling Carl Wells that you believed that you were discriminated against based on your gender?
A I don't know if I recall specifically saying that. I'm not entirely sure. I remember our first meeting was kind of me just going over what had happened.
Q And you said there was someone else there? Mr. Shepherd?
A Yes. Kevin Sheppard.
Q Kevin Sheppard. And do you know what his position is?
A No. I think he's -- I mean, I think Carl Wells was the director of the EOP, but I think he was some type of investigator perhaps. I'm not entirely sure.
Q Okay. Is that the only time you dealt with Kevin Sheppard?
A Yes.
Q How did you first communicate with Michelle Hardee about your experience in Italy?
A I didn't really, like, communicate with her about it until after, I guess, the lawsuit had already been published and was in the news because I -- we

had, you know, supervisor-employee type relationship where I was just, you know, going to work and doing my research or my data analysis or whatever.

And at one point over the summer -- because she kept me on working for her because she liked me and she knew that I was, you know, looking for a job. And she's, like, "Well let me, you know, keep you here while you're still in the process of moving and adjusting." Whatever. And at one point she came up to me because she saw that the lawsuit was published, and she kind of asked me about it, and I didn't, you know, get into too much detail because it's pretty much available online. And she had kind of mentioned that she had had, you know, similar issues and hearing about students -- graduate students not having avenues for their complaints or complaints being mishandled by the university.

And then she separately, I think emailed me and asked me how she would go about doing an affidavit.

Q You stated earlier that the trip to Rome was initially going to be a full group trip.

A Yeah. Initially it was supposed to be a whole

group trip, but David and, I guess, Eros decided that they had too much stuff to do and needed to, you know, go shopping or whatever. I don't know specifically what they needed to do.

Q Does David speak Italian?

A Yes.

Q And Eros -- does he speak English?

A Yes.

Q Okay. With the exception of those two, do you know how many people in Monte Castello you spoke with who were able to speak English?

A I don't know of any people that were able to speak English that I could understand. I mean, there was the guy that drove me to the airport. He could say like the word -- he asked me if I had boyfriend. And that's all he could say. Or, you know, hello or basic -- I don't know -- things like that. But there was no one that I could actually communicate with or that knew enough English to kind of communicate in a way that I could understand.

Q Do you know or have an estimation of what you took out in student loans for the purposes of getting your master's degree?

A I have 60,000 in student loans plus interest.

Q Is that all from graduate school?

A Yeah. I didn't have any loans for undergrad. My undergrad experience was -- I got scholarships to completely cover it.
Q Do you think that your thesis committee had any preconceived opinions about you after your trip to Italy?
A Yes.
Q Did you work with your thesis committee at all prior to your trip to Italy?
A I had taken classes from some of the professors that were on my committee, but never, you know, had a direct, like, mentor relationship with them.
Q With the exception of the phone calls you made while you were stuck in Terni, did you make any other phone calls that weren't through Facebook?
A I made the phone calls to -- I believe I, you know, called David on -- with my actual, like, phone. I know Cody tried to. I called my mom with my actual, like, phone number, not through Facebook Messenger a few times.
Q Okay. Just while you were on the side of the road or were there other times you called your mom?
A I called her when I was, like no longer on the side of the road and I was back up in Monte Castello. We spoke on the phone too.

Q And then who did you speak with from USC? Was that only Dr. Miller that you spoke to on the phone?
A I believe I only spoke with Dr. Miller on the phone.
Q Okay. And that was through a normal phone call? Not a Facebook --
A Yes. Normal phone call. They had a couple of issues kind of contacting me and getting the service to go through.
Q With the exception of Alex, had you spoken to anybody else who had been to the ICA prior to your trip?
A No.
Q Well, I guess David and Alex. You spoke to both of them?
A Yes.
Q But any students who had gone?
A No, no students.

MS. ALBRECHT: I don't have any other questions. They may have, you know, one to clarify something for you, but I'm done.

MS. MOOSE: I'll go. I have a quick one.

REEXAMINATION

BY MS. MOOSE:
Q Tell me about the positions that you have applied

for that you were not able to get because of your degree.

A Yeah. So I've applied for so many positions. So this is probably no going to be an exhaustive list.

I applied at UNC Asheville. I applied at USC Beaufort for teaching positions. Trident Tech, which I was offered one class there, but it was art history because I have a graduate concentration in that. They didn't give me any studio courses.

I applied to various high schools to teach because I have my alternate certification through PACE. I applied at some museums. I applied I believe at UNC Wilmington.

I kind of applied various different places within South Carolina and North Carolina, you know, places that I could move with, you know, smaller financial cost because I can't really just hop across the country.

Q And in response to any of those applications, were you told you didn't get the position because you didn't have enough hours in painting?

A I was told for the UNC Asheville position, which was a painting position, that I didn't meet the requirement in their qualifications within my education.

Q What specifically did you need?
A Painting.
Q How many hours?
A I believe at least 30.
Q Would you get 30 hours of painting with a grad degree?
A No. Would I get that? Or did I get that is what you're asking?
Q I'm saying could you get 30 hours of painting?
A I believe so. I believe that's -- I mean, I possibly have the amount off. But whatever the requirement is, I was not able to do that.
Q Okay. Any other positions that you were not able to get because you didn't have the hours in painting you needed?
A I can't specifically think of all the jobs that I've applied to right now.
Q Okay. One more question. These communications you had with the lady who used to work at ICA --
A Ketia.
Q Ketia. How did you have those communications?
A She messaged me over Facebook?
Q Have those been produced?
A I don't believe so because they were fairly recent.
Q When was that?

A I'm not sure the specific date.
Q How did she know to reach out to you?
A I'm not certain.
Q Had you spoken with her before?
A No.
Q What exactly did she say?
A I -- like I said to Samantha -- it's kind of a summation -- she said that she had been affected by David as well and that they had some kind of -- you know, she was kind of bullied or treated poorly by him.

I know she used to have some type of working relationship with the ICA or some kind of relationship.

Q What kind of relationship?
A I'm not entirely sure. I didn't think to ask her what her relationship was.
Q When was that?
A When was what?
Q The working relationship with the ICA that she had.
A I guess sometime before David became the sole owner.
Q Anything else you can tell me about her complaints about ICA?
A No. I'd have to review the messages.

Q Okay. Can you make those available to your lawyer so I can get those?
A Absolutely.
MS. ALBRECHT: I thought when she had pulled the, you know, massive Facebook file that they're in there. But if it's not based on dates, I'll just --
MR. GESSNER: I'm going to look when I get back to my office because there's a lot of them --
MS. ALBRECHT: I know.
MR. GESSNER: -- and I don't want to go through every single one of your Facebook messages.
MS. ALBRECHT: But if it's not, we'll repull it.
MS. MOOSE: Okay.
Q (MS. MOOSE) Any other communications with anyone associated with ICA other than what we've covered today?
A I don't know anyone else associated with the ICA besides David.
MS. MOOSE: Okay. I don't have any more questions.
MS. ALBRECHT: Any more? Anybody else?
MR. GESSNER: No.
MS. ALBRECHT: All right.

FURTHER DEPONENT SAITH NOT.

(Whereupon, there being no further questions, the deposition was concluded at 8:15 p.m.)

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