

EXHIBIT 24

5/9/2022

ALEXANDRA STASKO

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17	DEPOSITION OF	17
18	ALEXANDRA STASKO	18
19	*****	19
20	Monday, May 9, 2022	20
21	9:36 a.m. - 12:40 p.m.	21
22		22
23		23
24		24
25		25
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1	The deposition of Alexandra Stasko was taken	1 STIPULATIONS
2	before Kimberly C. Young, a notary public in and for the	2 It is stipulated by and between counsel
3	State of South Carolina, commencing on May 9, 2022, at the	3 for the respective parties that all objections
4	law offices of Cromer Babb Porter & Hicks, 1418 Laurel	4 are reserved until the time of trial, except as
5	Street, Columbia, South Carolina, pursuant to Notice of	5 to the form of the questions.
6	Deposition and/or agreement of counsel.	6 This deposition is being taken pursuant to
7	APPEARANCES	7 the Federal Rules of Civil Procedure.
8	Attorney for the Plaintiff:	8 - - - - -
9	Elizabeth Bowen, Esquire	9 The reading and signing of this deposition
10	Nicholas Quatraro, Law Clerk	10 is reserved by the deponent and counsel for the
11	CROMER BABB PORTER & HICKS	11 respective parties.
12	1418 Laurel Street	12 Whereupon,
13	Columbia, South Carolina 29201	13 ALEXANDRA STASKO, being duly sworn and cautioned
14	beth@cbphlaw.com	14 to speak the truth, the whole truth, and nothing
15	- - - - -	15 but the truth, testified as follows:
16	Attorney for the Defendant University of South Carolina:	16 EXAMINATION
17	Evan M. Gessner, Esquire	17 BY MS. BOWEN:
18	DAVIS FRAWLEY	18 Q. Thank you, Ms. Stasko. I know you've probably
19	140 East Main Street	19 gone through this with the court reporter but if
20	Lexington, South Carolina 29072	20 you would please state your full name for the
21	evan@oldcourthouse.com	21 record.
22	- - - - -	22 A. Alexandra Stasko.
23	Attorney for the Defendant David Voros:	23 Q. Okay. And is this the first time you've given a
24	Damon Wlodarczyk, Esquire	24 deposition?
25	RILEY POPE & LANEY	25 A. Yes.
	2838 Devine Street	
	Columbia, South Carolina 29205	
	damonw@rplfirm.com	
	- - - - -	
	Also Present:	
	David Voros - via Zoom	
	Jaime Misenheimer - via phone	
	Pamela Bowers	

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1 Q. Okay. I'll go through some certain ground rules	1 A. Evan Gessner.	
2 and then I have some recommendations I'll add.	2 Q. Okay. And what capacity did you meet with Evan	
3 First, you are required to ask me, while I am the	3 Gessner in?	
4 counsel deposing you, for clarifications,	4 A. Just -- what -- can you explain? Can you	
5 definitions or explanations of any words,	5 rephrase the question?	
6 questions or documents that are presented during	6 Q. As in, does Evan Gessner represent you?	
7 the course of the deposition. Second, the	7 A. No.	
8 attorneys may object to the form of my questions	8 Q. Okay. And what did you and Evan Gessner discuss	
9 but you'll still need to answer the question	9 during your meeting?	
10 unless you're specifically instructed not to do	10 A. How this might go.	
11 so. Third, you're not allowed to engage in	11 Q. Okay. And did he give you any instruction on how	
12 private, off-the-record conferences with your	12 to respond today -- to the answers today?	
13 counsel during depositions or during the breaks	13 A. Not besides the rules that you sort of	
14 or recesses regarding the substance of the	14 illustrated in the beginning.	
15 testimony of the deposition. And if you do have	15 Q. Okay. And did he discuss -- did he ask you any	
16 -- engage in any of those communications, I am	16 questions about the case or about the amended	
17 allowed to ask you about the substance of those	17 complaints?	
18 communications. Additionally, I'd like to point	18 A. No.	
19 out to you we have a court reporter here	19 Q. Did he ask you about what you knew about the	
20 recording everything that you and I say. With	20 amended complaints?	
21 that in mind, to keep a clear record for the	21 A. No. I asked for the amended complaint because I	
22 court reporter, try to let me finish asking the	22 knew when we were asking -- we were talking about	
23 question before you begin answering and I'll do	23 the case that things had been changed.	
24 my best to do the same. Also, we have a tendency	24 Q. Okay. And when you say when you were talking	
25 to give nonverbal responses, a shake of the head	25 about the case, what -- what were you guys	
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1 or a nod. Please try to give verbal responses	1 talking about?	
2 for the benefit of the court reporter and for the	2 A. Well, why I'm being deposed.	
3 record. This is not a marathon so if at any	3 Q. Okay. And what is your understanding of why	
4 point you need a break, let me know and we'll try	4 you're being deposed?	
5 to get to a stopping point to accommodate you.	5 A. I think it's because I'm a witness to a lot of	
6 A. Sure.	6 the events and because of online activities I've	
7 Q. You will have the option to review the transcript	7 participated in.	
8 of your deposition or you can waive that	8 Q. Okay. And what online activities are you talking	
9 decision. If you choose to review your	9 about?	
10 transcript, you're able to note transcription	10 A. Social media activities from Twitter and	
11 errors but you're not allowed to make substantive	11 Instagram.	
12 changes. Do you understand everything we've gone	12 Q. Okay. How long did you meet with Evan Gessner?	
13 through?	13 A. An hour and a half, two hours.	
14 A. Yes.	14 Q. Okay. And you, I'm assuming, you discussed what	
15 Q. Okay. Are you sober, mentally competent and able	15 was -- what you posted on social media?	
16 to truthfully answer my questions today?	16 A. Not the content but just the act of doing so.	
17 A. Yes.	17 Q. Okay. What else did you discuss with Evan	
18 Q. Do you have any issues with your recall or your	18 Gessner?	
19 memory?	19 A. We discussed Allison Dunavant's case a little bit	
20 A. No.	20 and how I believe this is all tied together.	
21 Q. Did you do anything to prepare for today's	21 MS. MISENHEIMER: I'm sorry, is it possible -- it's	
22 deposition?	22 difficult for me to hear.	
23 A. I've read the amended complaints recently.	23 MS. BOWEN: Okay. Let me see if I can put you closer.	
24 Q. Okay. Did you meet with your -- with any	24 MS. MISENHEIMER: I'm not sure. It's just a little	
25 attorneys to prepare for today's depositions?	25 quiet. I'm trying to hear. Sorry to interrupt.	

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1	MS. BOWEN: Okay. Let -- just speak up if you have	1	Q. Okay. What are your opinions that you revealed
2	any more issues. We'll move forward, just let us	2	to Evan Gessner?
3	know.	3	A. That I don't believe everything she says.
4	MS. MISENHEIMER: Okay. Thank you.	4	Q. And what are you basing that on?
5	MS. BOWEN: Okay.	5	A. Living, experience, living my life.
6	BY MS. BOWEN:	6	Q. Okay. And then did you speak specifically about
7	Q. And what is your knowledge of the Allison	7	Pam Bowers?
8	Dunavant case?	8	A. Yes. Yes.
9	A. Can you be more specific?	9	Q. And what did you say about Pam Bowers to Evan
10	Q. Yes. Well, what do you know about Allison	10	Gessner?
11	Dunavant's case?	11	A. That I also don't believe everything that she
12	A. A lot.	12	says.
13	Q. Okay. And how do you know -- how do you know	13	Q. What, specifically, don't you believe about what
14	about Allison Dunavant's case?	14	they're saying?
15	A. Because I'm an eyewitness to many of her alleged	15	A. Nearly everything.
16	events, because I've read the court evidence.	16	Q. Do you have any proof to dispute what they're
17	Q. Okay. So have you read the depositions?	17	saying?
18	A. Yes.	18	A. Some things.
19	Q. Okay. And how did you come into possession of	19	Q. Okay. What can you -- what do you have proof
20	those depositions?	20	that's untrue?
21	A. From David.	21	A. You'd have to be more specific. I -- I don't
22	Q. Okay. So David Voros provided you with those	22	know. I've been collecting a lot of evidence in
23	depositions?	23	my head and thinking about lots of the different
24	A. I wouldn't say that.	24	facets of this case. You'd have to ask me more
25	Q. Okay.	25	specifically.
Page 10		Page 12	
1	A. We --	1	Q. Okay. So sitting here right now, you can't tell
2	Q. So --	2	me specifically what you can dispute?
3	A. -- we live together so I kind of --	3	A. About Pam's case?
4	Q. Okay.	4	Q. Yes.
5	A. -- have access to his materials.	5	A. I believe that Pam is contextualizing events in a
6	Q. Okay. You currently live together?	6	way that is favorable to this lawsuit.
7	A. We maintain two houses, but we -- we go back and	7	Q. Okay. And what about Jaime?
8	forth and so we do.	8	A. Well, I don't -- seeing as how Jaime's made
9	Q. Okay. And so you reviewed the amended complaints	9	outrageously offensive allegations about me which
10	in preparation for today?	10	I know to be untrue, I don't believe much of what
11	A. Uh-huh.	11	Jaime says.
12	Q. And did you review any of the depositions?	12	Q. What allegations are you talking about?
13	A. No.	13	A. Trading sexual favors for anything.
14	Q. Okay. But you have read all of the depositions	14	Q. Okay. Have you talked to David Voros about the
15	from those cases?	15	fact that you're being deposed today?
16	A. Yes. Maybe not all of them.	16	A. Yes.
17	Q. Okay. What else can you tell me about your	17	Q. And what conversations have you had regarding
18	discussion with Evan Gessner?	18	what's going to occur today?
19	A. I can't really tell you anything else.	19	A. Nothing about what's really going to occur. I
20	Q. Okay. So you spoke about Allison Dunavant's	20	mean he's been through it, so. And I have seen
21	case. Did you speak about any of the specifics	21	him go through it so there's no mystery.
22	about Jaime Misenheimer's case?	22	Q. Okay. What's your current -- you said you
23	A. I'm sure we did. He asked me what I thought, I	23	maintain two houses. What are your current
24	think, but I couldn't be sure. I -- I revealed	24	addresses?
25	my opinions about Jaime's case.	25	A. My address is 31 Downing Street in Columbia,

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1	South Carolina 29209. And Dave's is 125 Point	1 that, he worked at the Township Auditorium.
2	South Lane in Lexington and I don't know the	2 Q. Okay. So is he in the Columbia area?
3	postal code for that.	3 A. No.
4	Q. Okay. Do y'all own any other properties?	4 Q. Where does he reside?
5	A. No.	5 A. I don't know.
6	Q. And how long have you lived at those addresses?	6 Q. Okay. Do you have any family members who are 18
7	A. I got my house in 2017 and Dave, I think, got his	7 years or older who live in South Carolina?
8	fairly shortly afterwards.	8 A. I do.
9	Q. And other than David Voros, does anyone else live	9 Q. Okay. And what are their names?
10	there with you?	10 A. Charlie Hancock, Michele Risso, Pamela Yannitello
11	A. Yes.	11 and family -- there's some Palachevskys that are
12	Q. Who lives there?	12 my family and there might be a Stasko or two
13	A. My best friend, Allie Childers. Oh, Smith now.	13 still floating around in South Carolina.
14	Alverta Smith.	14 Q. Okay. Hancocks, where do they live?
15	Q. And how long has she lived there?	15 A. Charlie, I don't know where she lives anymore.
16	A. She doesn't live there now. Do you mean how long	16 She was a USC student when all of this was
17	did she live in that house with me?	17 occurring.
18	Q. Yeah.	18 Q. Okay. What about Michele Risso?
19	A. Between a year, a year and a half. Between a	19 A. By Hilton Head but it's not exactly Hilton Head
20	year and a year and a half.	20 but by Hilton Head.
21	Q. When was that?	21 Q. Beaufort County?
22	A. When we first moved in, when I first moved in, in	22 A. Something like that.
23	2017.	23 Q. Pamela?
24	Q. But outside of you and David Voros, no one	24 A. I don't know either. They're more cousins.
25	currently lives in either of those houses?	25 Q. And Palachevskys?
Page 14		Page 16
1	A. No.	1 A. Those would be her children and I don't really
2	Q. Okay. What is your date of birth?	2 know.
3	A. September 23, 1989.	3 Q. Okay.
4	Q. Are you married?	4 A. The Rissos are also in Beaufort and the
5	A. No.	5 Lowcountry area.
6	Q. Have you ever been married?	6 Q. Okay. What social media sites do you use?
7	A. Yes.	7 A. Twitter, Facebook and Instagram.
8	Q. And who were you married to?	8 Q. And what are your user names that you use on
9	A. Todd Miller.	9 those sites?
10	Q. When were you married to him?	10 A. Well, I have many from all of these online
11	A. 2014.	11 activities over the last few months, but my main
12	Q. Is that when you -- the marriage began or was it	12 one that I have for myself is just Alexandra
13	--	13 Stasko.
14	A. Yes.	14 Q. Okay. And then what are the others that you've
15	Q. -- only in 2014?	15 mentioned?
16	A. That's when the marriage began. We --	16 A. Facts First Please. How Many of These Can I
17	Q. Okay. And when was that -- when did that end?	17 Make. I'd have to look over a list to give you
18	A. Our divorce took a long time. And I think	18 the exact names. Teal Kitty Litter. Flamingo
19	probably 2018, maybe 2017.	19 Fan. Just very random, except for the Facts
20	Q. Where did Todd Miller work? Or where does he	20 First Please which is one that I've been using
21	work? Do you know?	21 more frequently.
22	A. I don't know where he works now, no.	22 Q. Okay. And you've been posting about these cases
23	Q. Do you know where he did work?	23 on those social media sites?
24	A. He worked -- he owned a minor league baseball	24 A. Yes.
25	team called The Springfield Sliders. And before	25 Q. Where have you been getting the information that

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1	you've been posting on these websites?	1 Q. And when did you graduate from each of those?
2 A.	Myself or the court evidence that I've seen in the Dunavant case.	2 A. 2011 for undergrad and 2015 for graduate school.
4 Q.	Have you spoken to David about what you post on the social media accounts?	3 Q. Were you a student of David Voros?
6 A.	From time to time.	4 A. Yes.
7 Q.	Has he ever instructed you to post anything on there?	5 Q. What years were you his student?
9 A.	No.	6 A. All the years I was in my graduate school
10 Q.	Has he ever posted anything on one of those sites?	7 schooling.
12 A.	No.	8 Q. So that would have been 2000 --
13 Q.	Why do you -- why are you making these posts on social media?	9 A. '12 to 2015.
15 A.	I'm expressing my free speech and my opinion.	10 Q. And if you will, walk me through your career
16 Q.	Is anybody else posting with you?	11 post-college, including any positions held and
17 A.	Can you rephrase the question?	12 dates.
18 Q.	Yes. Well, are you the only operator of the accounts that you've listed?	13 A. I taught an adjunct class at USC starting in 2015
20 A.	Yes.	14 with Virginia Scotchie in the ceramics
21 Q.	Okay. Do you know of any other screen names or individuals behind screen names that are posting about these cases?	15 department. Then I was employed for a semester
24 A.	I've seen a couple other screen names in the last month or so, two months maybe, that also seem to	16 as a painting technician. Then I was in Illinois
25		17 and going through my divorce. And then I
		18 returned to Columbia, South Carolina and began
		19 teaching a figure structure class. And then the
		20 next semester I taught two classes and then from
		21 there, two classes, one class. I started
		22 becoming employed with Benedict College in 2017
		23 and I am still there. Well, not now with the
		24 summer, but.
		25 Q. Okay. And so you said you went -- were in
Page 18		Page 20
1	be not in support of what the media has presented.	1 Illinois for the divorce and then when you
3 Q.	Okay. Do you know who operates those accounts?	2 returned for the figure structure class, was that
4 A.	No.	3 with USC?
5 Q.	Do you attend a church?	4 A. Yes.
6 A.	No.	5 Q. Okay. And so those classes you were referring to
7 Q.	Are you a member of any professional organizations?	6 until your Benedict was with USC?
9 A.	No.	7 A. Yes.
10 Q.	Any social organizations?	8 Q. Okay.
11 A.	No.	9 MS. BOWERS: What are the dates on that?
12 Q.	Where did you graduate from high school?	10 MS. BOWEN: What dates -- what -- and we'll have an
13 A.	Robinson Secondary School in Virginia.	11 opportunity to speak later --
14 Q.	What is your highest level of education?	12 MS. BOWERS: Okay. Sorry.
15 A.	Master's degree.	13 MS. BOWEN: -- so don't interrupt again.
16 Q.	And where did you get your master's?	14 MS. BOWERS: I'm sorry.
17 A.	University of South Carolina.	15 BY MS. BOWEN:
18 Q.	Okay. If you will, tell me in a narrative fashion where you attended school, the degree you received and when you received it post-high school.	16 Q. But just for the purpose of the record, what
22 A.	I went to undergrad at Coastal Carolina University. I received my BA in studio arts.	17 dates did you return to and start working at USC?
23	Then I went to the University of South Carolina and received my MFA in studio arts.	18 A. I guess that would be the spring of 2017.
24		19 Q. Okay. And then how long did you work at USC?
25		20 A. Up until not this past semester but the previous semester, fall 2021.
		21 Q. Okay. And who hired you to work at USC?
		23 A. My first initial hire was Peter Chametzky.
		24 Q. Was David Voros involved in the hiring process at
		25 all?

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1 A. He recommended me for the class.		1 A. That summer. Summer 2016.
2 Q. And then was he involved in any of the -- your		2 Q. Okay. And what happened that -- that -- let me
3 later teaching assignments?		3 ask you it this way. Who was the person who took
4 A. Besides continuing to recommend me? No, that's -		4 the first -- made the first move, so to speak?
5 - that's it.		5 A. It was a pretty equal coming together.
6 Q. Okay. So he continued to recommend you each		6 Q. Okay. And you continued to work for him, work
7 year?		7 under him, after that?
8 A. Yes.		8 A. Well, I started to work under him in 2017. But
9 Q. Okay. Tell me about the conversation you had		9 from 2016 and that summer and the time beyond, I
10 with David Voros that led him to recommend you		10 wasn't working under him.
11 that first year.		11 Q. Okay. And so at the time that he recommended you
12 A. It's been a very long time, but I know that he		12 for the position, the sexual relationship between
13 respected my figure work, I knew that he wanted		13 the two of you had already begun?
14 to give me a chance to get on my feet after the		14 A. Yes.
15 divorce, and that's about all I remember.		15 Q. Okay. Have you ever been terminated from any
16 Q. Okay. Did you reach out to him for a		16 employment?
17 recommendation?		17 A. No.
18 A. No.		18 Q. Have you ever been reprimanded from any
19 Q. How did you know that he was recommending you?		19 employment?
20 A. Because he asked if I was interested so I assumed		20 A. No.
21 he would be recommending me to the chair.		21 Q. The next few questions are routine, they're not
22 Q. Okay. When did you first meet David Voros?		22 intended to embarrass you in any way, but I do
23 A. In 2012.		23 apologize if they come off as invasive. First,
24 Q. When he was your professor?		24 have you ever been arrested for a felony?
25 A. Yes.		25 A. No.
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1 Q. Okay. And then when you were employed in the		1 Q. Have you been arrested for a misdemeanor in the
2 college, what was his position in relation to		2 last ten years?
3 yours?		3 A. No.
4 A. I suppose he was like an area head and at that		4 Q. Have you ever been sued?
5 point, because Dave was the only instructor who		5 A. No.
6 was familiar with working with the figure, I		6 Q. Have you ever sued anyone?
7 believe that class sort of fell under his		7 A. Sued as in in process of suing or have sued and
8 umbrella of watch.		8 gone to court or have the case been tried? I am
9 Q. Okay. So would he have been your supervisor?		9 suing --
10 A. Yes.		10 Q. Either --
11 Q. Okay. And at what point did your relationship		11 A. -- I am suing people right now.
12 with David Voros evolve into more than a		12 Q. Okay. Who are you suing?
13 relationship between colleagues?		13 A. The State Newspaper and Lucas Daprile, Mandy
14 A. The summer of 2016.		14 Matney and FITSNews and Allison Dunavant.
15 Q. Okay. And so at that point, your relationship,		15 Q. And what are you suing those people for?
16 was it a romantic relationship?		16 A. Defamation.
17 A. From the point of 2016?		17 Q. Who represents you in those lawsuits?
18 Q. Yes.		18 A. William Padgett.
19 A. A romantic relationship? I don't think I would		19 Q. Okay. Have you ever testified under oath?
20 qualify it like that.		20 A. No.
21 Q. Okay. Well, can you describe what your		21 Q. When and how did you first meet Pam Bowers?
22 relationship was?		22 A. She was a professor at USC so I'm sure I met her
23 A. We were friends. Very close friends that liked		23 in some critique or review but our relationship
24 each other.		24 didn't really begin until the summer of 2015.
25 Q. When did the relationship turn sexual?		25 Q. Okay. What happened in the summer of 2015?

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1 A. I came as an assistant and assisted with the	1 has.	
2 school.	2 Q. Okay. Were you aware, prior to the complaints	
3 Q. Okay. And what about Jaime Misenheimer, when did	3 that were filed by Jaime Misenheimer and Pam	
4 you first meet her?	4 Bowers, that they had made complaints against	
5 A. I don't think I ever met her at USC. It might	5 David Voros?	
6 have been one of the parties that Pam and Dave	6 A. Yeah, I was aware.	
7 had at her house.	7 Q. How were you aware of those complaints?	
8 Q. Okay. So you didn't interact with her during	8 A. He told me. We were living together at the time,	
9 your time at USC?	9 so.	
10 A. No.	10 Q. Did he tell you those complaints were untrue?	
11 Q. Tell me about the conversations you had with	11 A. I can't recall him saying anything as concrete as	
12 David Voros regarding the allegations from Pam	12 that. Again, I think it's just pretty understood	
13 Bowers.	13 between the both of us that these are not true.	
14 A. Can you be more specific? That's very broad.	14 Q. Okay. I think now is a good time, we're going to	
15 Q. Well, I kind of want to know all of the	15 take a ten-minute break and come back on the	
16 conversations so that's why I'm being that broad.	16 record. Thank you.	
17 I mean can you tell me when he first heard about	17 (Off the Record from 10:10 a.m. until 10:35 a.m.)	
18 the allegations what your conversation was?	18 BY MS. BOWEN:	
19 A. Well, it was a few days after -- either a few	19 Q. Okay. We are back on the record. Before we took	
20 days after or before Thanksgiving and I know his	20 that break, I think you mentioned some social	
21 first thought was thinking about the kids and how	21 media accounts that you operate and I want to go	
22 this was going to disrupt their holiday.	22 through a list that I've got here to ask whether	
23 Q. Okay. So you guys talked about that. Did he	23 these are ones that are accounts that are	
24 talk about whether -- did he say that Pam Bowers	24 operated by you.	
25 was lying about what occurred?	25 A. Sure.	
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1 A. I can't remember him saying anything as concrete	1 Q. So I think you've said Facts First Please is --	
2 as that. I think it's both understood between us	2 A. Uh-huh.	
3 that all of her allegations we both don't	3 Q. -- one of your accounts.	
4 believe.	4 A. Uh-huh.	
5 Q. Okay. And then tell me about any conversations	5 Q. What about Red Truck Blue Truck?	
6 you've had about when he learned that Jaime	6 A. Yes.	
7 Misenheimer was filing a lawsuit against him.	7 Q. Okay. And then Laura Tucker?	
8 A. Similar. Similar to Pam. Being upset, not	8 A. No.	
9 believing what she says.	9 Q. Or Laura Tucker 9?	
10 Q. Has he ever made any statements to you about	10 A. That's not me.	
11 their performance of their job duties?	11 Q. No? Okay. Fire Voros USC?	
12 A. Yes. Really everything about Pam's instruction	12 A. That's not me.	
13 has only ever been glowing. As far as Jaime	13 Q. Okay. I didn't think that would have been you.	
14 goes, I know that he was disappointed in her work	14 Another is Fire Fire Fire with multiple I's.	
15 performance. I know that he's mentioned that Pam	15 A. That's me.	
16 was disappointed in her work performance before.	16 Q. That is you, okay.	
17 Q. What did he specifically say he was disappointed	17 A. Yes.	
18 about?	18 Q. And I think that the Twitter handle I've got is	
19 A. Showing up to class late is the one I remember	19 Fire Fire and then F-I-I-I-I-I-1. Does that	
20 the most.	20 sound --	
21 Q. Anything else?	21 A. That --	
22 A. Not that I can recall.	22 Q. -- like yours?	
23 Q. Do you recall him ever saying any derogatory	23 A. -- sounds --	
24 names about Jaime Misenheimer or Pam Bowers?	24 Q. Okay.	
25 A. I can't recall anything specific, but I'm sure he	25 A. -- like it is, yeah.	

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1	Q. Five Times Over is --	1 we have not gone through?
2	A. Yes.	2 A. No.
3	Q. Blue Tang Tang Tang --	3 Q. Okay. And so each of those posts that if I see a
4	A. Yes.	4 post on one of those that you've confirmed are
5	Q. -- is that you? And I think I've got two that	5 your accounts, that would be you posting on
6	come up under Facts First Please. I've got a	6 there?
7	handle that's Facts First P-L-E-A-2; is that you?	7 A. I would assume so, yes.
8	A. Yes.	8 Q. Okay. Have you had any conversations or did you
9	Q. Okay. And then I've got another one that is	9 have any conversations -- I understand that
10	Facts First P-L-E-A-1. Are both of those you?	10 you're not employed there currently but while you
11	A. No. I -- I named it the Facts First Please and	11 were employed at USC, did you have any
12	it gave me the one that's the 2, I believe, or	12 conversations with David Voros about Pam Bowers?
13	assigned that.	13 A. While I was employed at USC, have I had
14	Q. Okay.	14 conversations with Dave about Pam?
15	A. Because I think the -- the original was chosen,	15 Q. Yes.
16	taken.	16 A. Yes.
17	Q. Okay.	17 Q. Okay. What did you speak to David Voros about
18	A. I only have one Facts First Please.	18 Pam, while you were still employed there, with
19	Q. And then Kiwi Cracker?	19 him?
20	A. Yeah.	20 A. Everything.
21	Q. Kiwi.Cracker?	21 Q. Okay. And when you say everything, what -- what
22	A. Yeah. Yes. Sorry.	22 are you referring to?
23	Q. And then Twelves Oak Drive?	23 A. The Dunavant case, the new cases, the school, the
24	A. Yes.	24 children, everything.
25	Q. And I'm going -- it says How Many of These Can I	25 Q. Okay. And so those conversations would have
	Page 30	Page 32
1	Make?	1 taken place while you were at USC?
2	A. Yes.	2 A. Oh, in the physical location?
3	Q. Okay. I think you said that earlier but I didn't	3 Q. Yes.
4	understand that that was a screen name.	4 A. Oh, no, I've -- I -- I don't even know if I've
5	A. Yes.	5 spoken to Dave in the school since I was a
6	Q. Okay. And then another one that is just Facts	6 graduate student. When I had taught my class, I
7	First Please.	7 would go in and go out, I would never --
8	A. There's only one Facts First Please.	8 Q. Okay. So you --
9	Q. Okay.	9 A. Oh, no, I'm sorry. Yes, I've -- I've spoken with
10	A. And I'm pretty sure the 2 is the one that shows	10 Dave a couple times at school, but not -- not
11	up for me.	11 about the case.
12	Q. Red Boy Red Nose Moe?	12 Q. Okay.
13	A. Yes.	13 A. Maybe about the vandalism, the activism.
14	Q. Okay. Rename Strom Blocked Me?	14 Q. Okay. And when you're talking about the
15	A. Yes.	15 activism, what are you talking about?
16	Q. And yes, meaning that that is you?	16 A. Everything about it, where it is, have I spoken
17	A. Yes.	17 to Laura, who might be behind it. Everything
18	Q. Okay.	18 about it.
19	A. Uh-huh.	19 Q. Okay. And so the activism, are you talking about
20	Q. Flamingo_Fan2332?	20 the protests about Dave continuing to work at the
21	A. Yes.	21 school?
22	Q. And then B. Travis Rolle and the handle is	22 A. Yes.
23	@beyondtrolled?	23 Q. Okay. And what did he specifically say to you
24	A. No.	24 about the activism? I think that you said that
25	Q. Are there any others that you can think of that	25 he was asking you whether you had spoken to Laura

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1	about it?	1 Bowers?
2	A. Uh-huh.	2 A. Yes.
3	Q. Okay.	3 Q. Okay. Tell me about those conversations.
4	A. Just if I've told Laura, called the police.	4 A. The -- most of the issues that I discussed with
5	Q. Okay. And did he ever accuse Pam Bowers of being	5 Dave have always really been centered around the
6	behind the activism?	6 children and co-parenting.
7	A. No. But he believes, as do I, that she is	7 Q. Okay. And so tell me about the conversations
8	friends with those who are behind the activism.	8 that you had.
9	Q. Okay. And he told you that?	9 A. Well, clearly we both believe what has happened
10	A. That he believes that she knows who's behind the	10 to the children as a result of all this is
11	activism or is acquainted with them? Yes.	11 terrible. We -- I believe Pam is very selfish.
12	Q. Okay. But he hasn't said that he believes that	12 I believe --
13	she is behind the activism?	13 Q. And I understand that you have your own thoughts
14	A. No.	14 about the case, but what I'm -- what I need to
15	Q. Okay. Did he ever speak to you about Jaime	15 know is what David Voros specifically told you
16	Misenheimer while -- or did you ever speak to him	16 about Pam.
17	about Jaime Misenheimer while you guys were on	17 A. That what she's doing to the children is
18	campus?	18 terrible.
19	A. Not that I can recall.	19 Q. And what is he referring to, do you know?
20	Q. How often would you have spoken to David Voros	20 A. I think trying to come between him and the
21	while you were working at USC?	21 children is what he believes -- he was attempting
22	A. It would be very rare. It would be a very rare	22 to serve Pam with a parental alienation lawsuit;
23	occasion.	23 that did not pan out unfortunately. So I think
24	Q. How often would you say?	24 there's been a lot of conversations about that.
25	A. A couple times a month maybe. And there were	25 And it's hard to remember specifics but the
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1	certain periods where there was absolutely no	1 general -- the general feeling is that the
2	communication while I was at USC. There were	2 children have suffered and he is upset about it.
3	certain periods when he was at the school more	3 Q. Okay. What has he said about the allegations
4	often after their divorce. He was certainly at	4 that she has brought against him in the lawsuit?
5	the school more often because he wasn't at the	5 A. That they're false.
6	home. But for some time now, he hasn't been at	6 Q. Okay. And anything specifically?
7	school when I've been at school.	7 A. Not that I can recall.
8	Q. Okay. Would you guys see each other in the	8 Q. Okay. Has he said anything else about Pam or
9	hallways and things like that?	9 what she's been doing?
10	A. Huh-uh. No, the only time would be when he would	10 A. Could you be more specific?
11	be in his office and I would take a break. We've	11 Q. Well, has she said -- he said anything else about
12	got a very strict break schedule in the figure	12 the lawsuit, specifically?
13	structure class. So usually on our long break in	13 A. No, not that I can recall.
14	between, if he -- if we were ever to have a	14 Q. Has he said anything about Jaime Misenheimer's
15	conversation, it would be me going there on our	15 allegations to you?
16	15-minute break and just visiting him.	16 A. That they're not true.
17	Q. Okay. And so you did that while you were	17 Q. Has he ever talked to you about whether Pam
18	employed?	18 Bowers should be teaching at USC?
19	A. Uh-huh.	19 A. No.
20	Q. Okay. But you don't recall any conversations	20 Q. Has he ever talked to you about whether he
21	about Jaime Misenheimer?	21 believed that Susan Misenheimer should be
22	A. No.	22 teaching at USC?
23	Q. Okay. And outside of conversations about	23 A. Can you rephrase the question?
24	activism, do you recall any conversations that he	24 Q. Has he -- has David Voros ever spoken to you
25	would have with you about any issues with Pam	25 about whether he believed that Misenheimer, Jaime

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1	Misenheimer, should be teaching at USC?	1	They were -- they offered to meet with me and
2	A. He never had a problem with Jaime. I know she	2	hear out my frustrations.
3	went to continue working for Dawn and there was	3	Q. Okay. And so you reached out regarding your
4	never any discussion that that was a problem or	4	frustrations regarding the activism?
5	that was upsetting in any way.	5	A. Yes.
6	Q. Did he ever tell you that he wanted Pam Bowers	6	Q. Okay. And they agreed to meet with you all as a
7	removed from the university?	7	group?
8	A. Never.	8	A. Yes.
9	Q. Did he ever tell you that he wanted Misenheimer	9	Q. Okay. And tell me about that meeting.
10	removed from the university?	10	A. I don't recall much of that meeting. I've --
11	A. Never.	11	I've tried to. But it was pretty -- there wasn't
12	Q. Have you tagged the University of South Carolina	12	any substance to the meeting. I explained my
13	or any of the departments in the University of	13	position, they tried to point me in a few
14	South Carolina in your posts, your social media	14	different directions, they toyed with the idea of
15	posts?	15	assisting me in making a statement to the press,
16	A. Yes.	16	and then nothing ever panned out from that
17	Q. Okay. And why is that?	17	meeting.
18	A. To express my opinion.	18	Q. Okay. Did they ever question you about your
19	Q. Have you had any -- or has anyone from USC ever	19	knowledge of Pam Bower's complaints?
20	interviewed you regarding the allegations against	20	A. No.
21	David Voros?	21	Q. Did they ever question you regarding your
22	A. Yes. In the Dunavant case or in these two new	22	knowledge of Jaime Misenheimer's complaints?
23	cases?	23	A. No.
24	Q. In any of the cases?	24	Q. Okay. Did anyone ever question you regarding the
25	A. In the Dunavant case, I was questioned.	25	complaints that were made against David Voros?
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1	Q. Who were you questioned by?	1	A. No.
2	A. Mr. Gessner.	2	Q. Do you know who was teaching the classes that you
3	Q. Okay. So you were questioned by the university's	3	were assigned to before you were assigned those
4	attorney in that case?	4	classes?
5	A. Uh-huh, yes.	5	A. The figure structure classes?
6	Q. Okay. Was -- do you know if that was after the	6	Q. Yes.
7	lawsuit had been filed?	7	A. I wasn't aware of the lower level figure
8	A. I believe so.	8	structure classes really. I learned Jaime was
9	Q. Okay. Have you spoken to anyone other than Mr.	9	teaching them only through this lawsuit. But I
10	Evan Gessner about the allegations against David	10	knew Brian Rego used to teach, I knew of a couple
11	Voros?	11	of the adjuncts that used to teach it. But I
12	A. Yes.	12	wasn't -- the 232 and 33 classes weren't even
13	Q. And who is that?	13	really on my radar as a graduate student. So the
14	A. My attorney, William Padgett.	14	only person I ever worked with in figure drawing
15	Q. Okay. Outside of your own attorney and the	15	was David in the upper level classes.
16	university's attorney, have you spoken to anyone	16	Q. Did David Voros ever tell you why he assigned you
17	at USC about the allegations?	17	to those classes instead of Jaime?
18	A. Yes. Terry Parm. When these new activism	18	A. There was no instead of --
19	movements were occurring, I spoke to Terry	19	MR. GESSNER: Well, object to the form. Answer as
20	Parham, I spoke to Susan Bon and I spoke to Mark	20	best you can.
21	Bieger. And I spoke to Carl Wells. I think that	21	A. -- there was no instead of Jaime. There was
22	that might be it.	22	never any conversation as in I'm taking this
23	Q. Did they interview you?	23	class from Jaime. It's -- I -- you know, "I've
24	A. No. I guess they were -- it was a meeting. I	24	worked with you for many years, I think you would
25	don't know if I would qualify it as an interview.	25	be good at this, would you like to give it a

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1	try," and I said yes.	1 with ICA?
2	Q. Do you know whether those positions were ever	2 A. Four or five times.
3	posted within the university?	3 Q. And for the record, when you're referring to ICA,
4	A. No, I don't know.	4 what are you referring to?
5	Q. Have you heard anyone say anything about Jaime	5 A. The International Center for the Arts in Monte
6	Misenheimer's ethnicity?	6 Castello.
7	A. Yes.	7 Q. Okay. And how did you become involved with the
8	Q. What have you heard?	8 ICA?
9	A. I've heard from her exhusband that this must be a	9 A. Dave invited me. At the end of my thesis show,
10	recent discovery.	10 he invited me.
11	Q. What are you talking about?	11 Q. Okay. And so when you were still a grad student?
12	A. I'm friends with her exhusband, Blake Morgan, and	12 A. The invitation probably came when I was still a
13	when all the Native American stuff came up, he	13 grad student.
14	was very surprised. He did not -- I don't think	14 Q. Okay. And so was the first summer you went was
15	anybody doubts that she's got Native American	15 the I think 2016, the summer of 2016?
16	blood, I mean she's from Oklahoma, I'm sure lots	16 A. 2015.
17	of people have a percentage of Native American	17 Q. Okay. And so you said that you may have brought
18	blood, but it wasn't something that he was aware	18 up the topic about her ethnicity being raised?
19	of that she was identifying with.	19 A. Uh-huh.
20	Q. When did you have this conversation with her	20 Q. And tell me what happened after that.
21	exhusband?	21 COURT REPORTER: Was that a yes?
22	A. I don't recall the specific summer but it was a	22 A. Yes.
23	summer in Italy.	23 COURT REPORTER: Okay. Thank you.
24	Q. And so the -- this -- explain to me how this came	24 A. Sorry.
25	about, this conversation where you and her	25 COURT REPORTER: That's okay.
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1	exhusband are in Italy.	1 A. I'm sorry, could you repeat the question?
2	A. How did the conversation come about?	2 Q. Yes. So you brought up that her ethnicity had
3	Q. Yes.	3 been raised as an allegation in her lawsuit; is
4	A. Well, we were all working there together so over	4 that what happened?
5	dinner, over wine, some social setting.	5 A. I remember bringing up how incredibly unethical
6	Q. Okay. And who brought up that she was -- had	6 her allegation against Laura Kissel and the
7	allegations surrounding her Native American	7 crystals sounded to me.
8	ethnicity?	8 Q. Okay. And how did the rest of the people respond
9	A. I might have but I don't recall who necessarily	9 who were present?
10	brought that topic up.	10 A. They also believed that it sounded false, that it
11	Q. And who all was involved in this conversation?	11 did not ring true.
12	A. I'm sure Dave and myself and probably Sierra and	12 Q. Did David Voros say that he believed it was
13	Blake.	13 false?
14	Q. Who is Sierra?	14 A. I don't recall for sure but I imagine he would
15	A. Sierra is Blake's wife.	15 have. Him and Laura aren't the greatest of
16	Q. And you don't remember what summer this was?	16 friends but I think even he would never have
17	A. No, I don't.	17 supported allegations of that nature against her.
18	Q. How many times have you been to Italy?	18 Q. Okay. Outside of the conversation that you had
19	A. Seven or eight.	19 with Jaime Misenheimer's exhusband, have you had
20	Q. Were all of those times a summer trip or were	20 any other -- or are there any other times that
21	they spread out?	21 you have heard Jaime Misenheimer's ethnicity
22	A. All of them were in the summer but not all were	22 discussed?
23	with Voros. I've been to Italy for two summers	23 A. Besides -- online, my online activities.
24	before getting involved with ICA.	24 Somebody, a former student named Evelyn Wong,
25	Q. Okay. So you -- how many times have you been	25 brought them up and debated with me pretty

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1	extensively about them.	1 A. Yes.
2	Q. Saying that it was true?	2 Q. -- deposition? I'd like you to take a minute to
3	A. She didn't believe that Laura Kissel was being	3 go through here and let me know, and you can take
4	racist, she believed that she was offering help	4 your time, but let me know if reading through
5	in all sincerity, you know, as do I, but that --	5 these allegations, if that jogs your memory of
6	I don't -- that it -- I suppose Evelyn's argument	6 anything that David Voros has said regarding
7	is that it's not up to Laura to know whether or	7 these specific allegations.
8	not she's being racist. I -- I don't know.	8 A. (Witness reviews document). Point 12, is that
9	You'll have to review the messages. But I think	9 what I say? Point 12 or line 12?
10	we both came to the agreement that it wasn't	10 Q. Yeah, or paragraph 12, that's fine.
11	offered maybe negatively but Evelyn's position	11 A. Paragraph 12. Clearly, he says there's no more
12	was that Jaime had every right to perceive it	12 than one, there's never been an improper sexual
13	negatively.	13 relationship with anyone other than myself.
14	Q. Okay. So you're not disputing that the comments	14 Q. Okay.
15	about her ethnicity or about crystals were made?	15 A. I think he is disturbed and amused by Pam
16	A. No.	16 contextualizing their interactions as unwelcome
17	MR. GESSNER: Object to the form.	17 sexual advances.
18	Q. Okay. You were just disputing whether -- whether	18 Q. So he says that they are not unwelcome sexual
19	Laura Kissel was -- meant it in a racial way; is	19 advances?
20	that --	20 A. No. Yeah, the sexual advances thing I've already
21	A. Yes.	21 said, but I think he's pretty steadfast in that
22	Q. Okay. Outside of that Misenheimer and Bowers'	22 that is very much untrue. I know there's been --
23	allegations are false, can you tell me anything	23 there's some mentions of entering the classrooms
24	else specifically that David Voros has said about	24 and I know Dave would say that the classroom, the
25	Jaime Misenheimer or Pam Bowers' work	25 painting classroom that most of the painting
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1	performance?	1 classes are taught in, are also the supply
2	A. No.	2 storage, all of the supplies are stored in that
3	Q. Can you tell me anything else that he has said	3 room.
4	about the allegations in the complaints?	4 Q. Uh-huh.
5	A. Well, he's said many things but it's pretty much	5 A. And I would say trips to the classroom were often
6	as I've told you, that they are false and he	6 made in supply-related activities. That's very
7	thinks it's wrong that this has all happened.	7 much how it is in ceramics. Virginia is moving
8	Q. When you say he's said many things, let's start	8 through that classroom all the time so I know
9	with Pam Bowers. What -- what are the many	9 he's made comparisons in that regard.
10	things that he has said about Pam Bowers and her	10 Q. Okay. And so he's told you that he was going
11	lawsuit?	11 into the classroom to fetch supplies?
12	A. That they're false. I don't know what else I can	12 A. Fetch supplies or any other department-related
13	really say. That every specific thing is false,	13 thing.
14	but you would have to go over the specific points	14 Q. Okay.
15	in her allegations with me.	15 A. Uh-huh. "No classes to teach or any other
16	Q. Okay. I'm going to hand you what we are going to	16 legitimate reason to be on campus." I know Dave
17	mark as Exhibit 1 and this is Pam Bowers'	17 was spending a lot of time on campus post-divorce
18	complaint.	18 because of not being at the home. So I
19	(Plaintiff's Exhibit Number 1 was marked for	19 understand that it certainly appeared that Dave
20	identification purposes.)	20 was at school more often; that would be true, I
21	Q. Do you recognize the document that I've just	21 would say. David moved into my house with my
22	handed you?	22 friend that I was renting for a little while but
23	A. I do.	23 he was not comfortable being at the house for
24	Q. Okay. And you said that you have reviewed the	24 long periods of time. It was a very small house
25	amended complaint prior to today's --	25 and we're two grown women.

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1	Q. Did David Voros ever speak to you about what is	1 something about the kids came up, Pam would get
2	written in paragraph 18?	2 upset, Dave would try to cajole her, she'd want
3	A. I can't recall the specific moment but I know he	3 to leave and she would leave.
4	and Pam had conversations about supplies that	4 Q. Okay.
5	probably veered into personal conversations and I	5 A. I think a lot of these moments of tension are all
6	don't -- it wouldn't surprise me that Ms. Bowers	6 co-parenting issues. A lot of them come from co-
7	wouldn't be comfortable with that. But I don't -	7 parenting issues when they were going through
8	- he would never not allow her to leave, I would	8 their divorce.
9	not believe that.	9 Q. These conversations that were occurring in the
10	Q. But you weren't a witness to --	10 workplace?
11	A. No.	11 A. Uh-huh. If things ever veered off of work-
12	Q. -- that particular incident?	12 related things, it would be about family-related
13	A. I mean he obviously said that's not true, he	13 things.
14	never halted her ability to leave.	14 Q. Okay. Did you hear about them having issues over
15	Q. And going through these, if you'll just let me	15 supplies?
16	know if there's any other points that you spoke	16 A. No, I don't recall anything about that. What are
17	to David Voros specifically about.	17 you -- is there a point you're referring to?
18	A. Sure, of course. I remember speaking about bits	18 Q. I -- I'm sure it's in here but I just didn't know
19	and pieces of these things but the only point I	19 whether he had ever shared with you that they had
20	can offer really is that he would say it's not	20 issues over supplies.
21	true.	21 A. Not that I recall.
22	Q. Did you ever hear David Voros refer to Pam Bowers	22 Q. Or did you ever hear that Ms. Bowers was
23	as a whore or any other type of derogatory name	23 requesting supplies that she was not receiving?
24	like that?	24 A. Not that I recall.
25	A. No. I know he's sent some emails that were not	25 Q. Okay.
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1	friendly. I know they could have hostile -- I	1 A. And then, of course, point or paragraph 84.
2	know Dave could have some hostile conversations	2 We've discussed here today that David did not
3	with her from time to time.	3 have anything to do with online activities, so.
4	Q. Did you see the emails that he sent to Pam	4 That's pretty much all I can remember. It's been
5	Bowers?	5 quite a long time.
6	A. Some. Some. You know, I -- I'm a woman and I'm	6 Q. Did David Voros ever tell you -- talk to you
7	curious and I would go on his computer from time	7 about the faculty's reactions to Ms. Bowers'
8	to time.	8 complaints?
9	Q. Okay. Did he ever share the emails with you?	9 A. Only that he was hurt and it might not have been
10	A. No.	10 in regard to Bowers' complaints, possibly in
11	Q. Okay.	11 regards to Dunavant's complaint. But I know he
12	A. I -- I don't think I could really tell you much	12 was hurt that he's been on the faculty for
13	more, other than these things aren't true. I	13 however, 20-plus years, and that he was hurt that
14	mean I've heard -- I have heard the story from	14 nobody reached out.
15	his perspective, so. The main point he would	15 Q. Okay. Did he -- you ever hear him speaking about
16	make when we were discussing these sorts of	16 being glad that he had certain faculty members'
17	issues is that they're presented in a false	17 complaint -- I mean support?
18	light.	18 A. No.
19	Q. What is the story from his perspective?	19 Q. Okay. Let's take another break. Hopefully, we
20	A. Well, about what instance?	20 should be getting close to a wrapping up point.
21	Q. Well, you -- you say you've heard the story from	21 Thank you.
22	his perspective, so I mean what -- if he responds	22 (Off the Record from 11:15 a.m. until 11:40 a.m.)
23	or have you --	23 BY MS. BOWEN:
24	A. Well, okay, the -- the office thing. I believe	24 Q. All right, Ms. Stasko. I think that you've
25	they were supposed to talk about supplies,	25 mentioned some trips earlier. Have you ever been

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1	on any USC-funded trips with David Voros?	1 mentioned earlier.
2	A. No.	2 Q. Okay. Outside of the conversation that you've
3	Q. Okay. Did you go to Taiwan with David Voros?	3 referred to regarding the activism earlier, are
4	A. Yes.	4 there other conversations you've had with Laura
5	Q. And that was not a USC-funded trip?	5 or Carl Wells regarding Jaime Misenheimer or Pam
6	A. No.	6 Bowers?
7	Q. Okay. What was that, the trip to Taiwan, for?	7 A. Yes.
8	A. I know he -- he was doing something with USC but	8 Q. Okay. Tell me about those conversations.
9	I went -- I went for entertainment or for	9 A. It was in regards to Pam Bowers making an online
10	pleasure, I would say. I had nothing to do with	10 post which I found intimidating and harassing.
11	his official business.	11 Q. Okay. When was that?
12	Q. Okay. So USC funded his portion of the trip to	12 A. When was the post made or when was the
13	go?	13 conversation?
14	A. Yes.	14 Q. Both.
15	Q. Okay. And so I'm assuming did they fund his	15 A. The post was made maybe 2019 and the conversation
16	flight?	16 I had with Laura was recent.
17	A. I assume so.	17 Q. Okay. How recent?
18	Q. Okay. And did --	18 A. Within a year when all of this kind of -- well,
19	A. I'm not sure.	19 maybe a year and a half now. Time has been so
20	Q. -- did they fund his hotel room?	20 strange in these last six years.
21	A. I assume so. I'm -- I'm not sure.	21 Q. Okay. So you said -- what was the post?
22	Q. Did you stay in his hotel room?	22 A. Well, I had posted something after the Dunavant
23	A. Yes.	23 case had wrapped up. I had made a sculpture, it
24	Q. Okay. Who paid for your flight there?	24 was about how I was feeling at the time, and I
25	A. Myself.	25 had wrote "I see you, too," as my Instagram post
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1	Q. Okay. And then did you go to Chicago with David	1 and hashtags typical art hashtags and then at
2	Voros?	2 the end, I hashtagged "with prejudice." You
3	A. Yes.	3 know, in the end, I like to have a few more
4	Q. And did David Voros go to Chicago for university	4 personal hashtags so it was "with prejudice,"
5	business?	5 snake, green eyes. And then Pam, a few days or
6	A. I don't recall. We met -- he met some family but	6 however longer later, made a post which says, "I
7	I don't recall if there was any official	7 see you, too," with a tree frog, black eyes,
8	university business in Chicago.	8 "with predators" -- she's hashtagging, excuse me,
9	Q. When was the Taiwan trip?	9 black eyes, "with predators," green eyes. Her
10	A. I have no idea honestly. No clue.	10 friend, Lauren Chapman, then made a post about
11	Q. And when was the trip to Chicago?	11 Pam Bowers being in the library with a
12	A. Winter, I remember. It was cold.	12 candlestick, referencing the game Clue --
13	Q. Do you remember what year?	13 Q. Okay.
14	A. I don't.	14 A. -- which I found threatening.
15	Q. Okay. Have you had any conversations with other	15 Q. Okay. And so you told Laura Kissel about this
16	employees from the university regarding Ms.	16 when?
17	Bowers' allegations?	17 A. A year, year and a half ago, something, somewhere
18	A. No.	18 in all this. After the lawsuits were reported.
19	Q. And same question; have you had any conversations	19 Q. Did you tell Laura Kissel about the identity of
20	with University of South Carolina employees	20 your -- that you were running the Facts First
21	regarding Ms. Jaime Misenheimer's complaints?	21 account?
22	A. I'm sorry, yes. Yes to the first question about	22 A. No. And the post I had made was from my art --
23	Ms. Bowers. And yes, I mean I've discussed with	23 my post, my Alexandra Stasko.
24	Laura and Carl Wells. I was thinking faculty	24 Q. Okay.
25	members. But Laura and higher admins that I	25 A. And I forgot to mention there was other people

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1 involved in that conversation. Grayson Smith, 2 previous business manager, was in attendance. 3 And then when I had gone to talk to Laura about 4 Pam's harassment, online harassment, she wanted 5 to meet with someone from HR who joined us from 6 Zoom. 7 Q. What came of that? 8 A. Nothing. 9 Q. Do you know if they ever spoke with Pam about it? 10 A. I don't. 11 Q. Outside of that conversation, have you had any 12 other conversations with anyone from the 13 university regarding Pam Bowers or Jaime 14 Misenheimer? 15 A. Not that I can recall. 16 Q. Have you spoken to anyone about the truthfulness 17 of their allegations? 18 A. Anyone in general? Like any person not related 19 to the university? 20 Q. Well, sure, let's start there. Have you spoken 21 to anyone about the truthfulness of their 22 complaints? 23 A. Yes. 24 Q. And to whom? 25 A. My friends and family.	1 Q. You've never shown him a post before you post? 2 A. No. I've shown him what I've posted and what 3 other people have posted. 4 Q. Outside of the people who you've mentioned that 5 you're bringing a defamation lawsuit against, 6 have you threatened to sue anyone else regarding 7 the allegations brought in this case? Or these 8 cases? I'm sorry. 9 A. I have. 10 Q. Who have you threatened to sue? 11 A. Cody Unkart. 12 Q. And why did you threaten to sue Cody Unkart? 13 A. Because of the allegations that have been thrown 14 around that I do drugs and am a drug addict. 15 Q. And those allegations were started by Cody 16 Unkart, you said? 17 A. That is what I believe. 18 Q. Do you know why those rumors or why those 19 allegations were started? 20 A. Because he's the only person who would have any 21 knowledge of something like that. 22 Q. And what are you referring to when you say he has 23 any knowledge of something like that? 24 A. Because of our activities over the summer. We 25 were at a party, there was an instance of some
Page 58	Page 60
1 Q. Okay. And what have you told your friends and 2 family? 3 A. That it's untrue. 4 Q. That the allegations in their complaints are 5 untrue? 6 A. Yes. 7 Q. But you have not spoken to anyone else at the 8 university about your opinion that they are 9 untrue? 10 A. Not besides the people that I've mentioned. 11 Q. Okay. Does anyone from the university know that 12 you run Facts First Please and these other 13 accounts that are not listed under your personal 14 name? 15 A. I am sure people assume but I don't think anybody 16 knows for sure. 17 Q. Have you told anybody else outside of David 18 Voros? 19 A. No. 20 Q. And David Voros is aware that you run these 21 accounts? 22 A. Yes. 23 Q. Does David Voros see any of the posts before you 24 post? 25 A. No.	1 experimenting, it was one evening, and that's the 2 only person who has any knowledge or insight into 3 any sort of activities that I do in that regard. 4 Q. Okay. What kind of drugs were used this evening? 5 A. That I mentioned? 6 Q. Yep. 7 A. Marijuana and cocaine. 8 Q. Okay. Have you made any other threats to sue 9 anybody else? 10 A. Not that I can recall. 11 Q. Do you recall ever making any threats to sue 12 Jaime Misenheimer? 13 A. Not that I recall. 14 Q. Are you related to Harris Pastides? 15 A. No. 16 Q. Are you Harris Pastides' stepdaughter? 17 A. No. 18 Q. Okay. Have you ever heard David Voros refer to 19 Pam Bowers or Jaime Misenheimer as a lesbian or a 20 bitch? 21 A. Not a lesbian but certainly a bitch. 22 Q. Okay. And which one of them or has he referred 23 to both of them as bitches? 24 A. At some point over these last six years, yes. 25 Q. Okay. And have you heard him refer to Pam Bowers

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1	as a damaged woman?	1 A. Yes.
2	A. No. I know what he -- I mean I've heard the stories. I know -- I know where they are getting that, I suppose.	2 Q. And did he tell you that he was upset that she -- that she declined the offer?
3		3
4		4 A. No.
5	Q. Okay. But you haven't heard him specifically use the term damaged women --	5 Q. Okay. Other than that, can you tell me anything else about paragraph 32? Did he speak to you
6		6 about anything else that occurred?
7	A. Never.	7 A. He told me about this incident and I can't recall
8	Q. -- damaged woman?	8 when. Probably when it happened. But yeah, he
9	A. Never.	9 said that he could see down her blouse and that -
10	Q. Okay. Have you heard him say that Ms. Bowers is lying about his -- the complaints about him?	10
11		11 -
12	A. Lying is a strong word and I don't know if I've heard him use that word specifically.	12 Q. Okay.
13		13 A. -- it seemed to be making students uncomfortable.
14	Q. Okay. Has he told you that Ms. Bowers is conspiring with other individuals or working with other individuals to bring him down?	14 Q. Okay. And did he tell you that she -- he told
15		15 her this at this point?
16	A. Has he -- can you say the beginning one more time? Has he told me?	16 A. In front of students? I believe -- I believe he
17		17 talked to her about it in the office. I don't
18		18 see Dave saying something in front of a group of
19	Q. Yes. Has he ever or have you heard him say or has he specifically told you that Ms. Bowers was conspiring with others?	19 students about her blouse.
20		20 Q. Okay. Okay. Next, I'm going to hand you what
21		21 we're marking as Exhibit 2.
22	A. I would say any conversations along those lines have been directed by me. I wouldn't say that he's offered that himself.	22 (Plaintiff's Exhibit Number 2 was marked for
23		23 identification purposes.)
24	Q. Have you ever heard him say that Ms. Bowers has	24 Q. Do you recognize this document?
25		25 A. Yes.
	Page 62	Page 64
1	other motives for her complaints against him?	1 Q. Okay. And do you recognize this as Ms.
2	A. Yes.	2 Misenheimer's amended complaint?
3	Q. When did he say that?	3 A. Yes.
4	A. I don't recall.	4 Q. Okay. And I want you, in the same sense that you
5	Q. And do you know who was present when he said that?	5 did for Ms. Bowers' complaint, to go through this
6		6 and let me know if you had any conversations with
7	A. Just us, me and him.	7 David Voros about any of these allegations in
8	Q. Okay. Has he ever told you that Ms. Bowers influenced others to make complaints against him?	8 this complaint.
9		9 A. (Witness reviews document). You want me to just
10	A. That he believes that she has, I would say.	10 like, for instance in paragraph eight, "Plaintiff
11	Q. Okay. If you will, turn to page six of Exhibit 1 and look at number 32.	11 met Defendant Voros after moving from Oklahoma to
12		12 South Carolina in 2004," we talked about how
13	A. Okay.	13 Jaime came with her ex-spouse, Blake Morgan. We
14	Q. Did he ever speak to you about offering a trip to Norway to Ms. Bowers?	14 talked about how she was an English major before
15		15 she came. We talked about how she took a very
16	A. Yes.	16 long time in undergrad. We've talked about --
17	Q. Okay. And can you confirm that he did offer Ms. Bowers a trip to Norway?	17 Virginia Scotchie also has come up to me in the
18		18 hallway and commented to me about Jaime's
19	A. Yes.	19 performance. She's told me to speak to Dave,
20	Q. Okay. Did he tell you about this exchange that occurred at paragraph 32?	20 because Dave and I were very close, about his
21		21 instructors and that students were waiting
22	A. The blouse?	22 outside the classroom for long periods of time
23	Q. Well, the -- this -- that Ms. -- well, first, did he tell you that Ms. Bowers declined his offer to	23 before Jaime would let them in. So you might
24	go to Norway?	24 want to ask Virginia about that.
25		25 Q. Okay. Did you speak to David Voros about that?

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1	A. At the time? No.	1 A. Yes. (Witness reviews document.) I mean I think
2	Q. Have you since?	2 it goes without saying that I -- I feel like I'm
3	A. Yes.	3 qualified to teach that class.
4	Q. And what did he say about it?	4 Q. With respect to which class?
5	A. It doesn't surprise him. That he's come to class	5 A. The figure structure class.
6	and had to let students in who'd been waiting in	6 Q. Okay. And what are your qualifications that lead
7	the hallway for 30 minutes sometimes.	7 you to say that?
8	Q. Let me see if can speed this up and ask you	8 A. I have an MFA and I have been studying the figure
9	specifically. I do have some.	9 for my whole life.
10	A. Okay.	10 Q. What was your experience prior to teaching that
11	Q. Has Dave ever -- David Voros ever told you that	11 class?
12	Jaime Misenheimer was slacking on her work?	12 A. In regards to teaching that class?
13	A. Slacking on her work? Could you be more	13 Q. Yes, in regards to teaching.
14	specific?	14 A. I was a TA in undergrad and then I was an
15	Q. Well, has he ever made any comments that --	15 instructor of record for a few classes, an
16	A. He's said that she's turned in hours but things	16 instructor of record for ceramics. Specifically
17	have not been completed. I recall him saying	17 nobody, as far as I know -- if you're asking
18	that.	18 about teaching any -- any teaching of the figure
19	Q. Do you know when he said that?	19 structure class or if I have any experience
20	A. I don't recall when that was. Would you like me	20 teaching that, there's nobody who really TA's for
21	to keep reading or?	21 that class as far as I know. But in terms of
22	Q. If you -- I mean if while going through the	22 studying the way the class runs, I mean I was in
23	complaint you see anything that you have spoken	23 figure drawing class for all three years of my
24	to Dave specifically about.	24 graduate degree. I was pretty familiar with how
25	A. Well I've, of course, talked to Dave extensively	25 working with models operates and just how that --
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1	about how upsetting and damaging Jaime's	1 that course is run.
2	allegations against me have been, how it feels to	2 Q. Are you aware of why Jaime Misenheimer was not
3	be a woman and being alleged to trade sexual	3 selected for that position?
4	favors. I don't think you could come up with	4 A. Am I aware -- I think Dave was a little
5	more offensive things to say. Frankly, I don't	5 disappointed with her performance in the class.
6	know how your law firm can put that in a lawsuit	6 I think -- he did tell me before that she wasn't
7	really. Where was it that I read earlier that	7 sticking to the SLOs, student learning outcomes,
8	"Based on her personal observations of our	8 or the typical class material that's supposed to
9	interactions," I don't really know what that	9 be covered. We follow this -- this book, "The
10	means, how somebody can personally observe and	10 Natural Way to Draw," and he was complaining that
11	make assumptions or allegations of that nature.	11 she was skipping over the fundamental gestures
12	So I've spent a lot of time discussing with Dave	12 and the fundamental exercises. And also that her
13	what a horrible, terrible person I think Jaime is	13 -- her tardiness was an issue and noted by
14	in that regard; how she could make allegations of	14 others. And as I said, I think he was also
15	that nature.	15 hoping to just give me an opportunity.
16	Q. And how did David Voros respond?	16 Q. When did he tell you all that?
17	A. He's upset, sympathetic. I don't think he quite	17 A. I don't recall when.
18	understands the gravity of the situation not	18 Q. Would it have been before this lawsuit?
19	being a woman. But I'm sure a man would feel	19 A. I don't think it was. It might have been but I
20	terrible if he was accused of prostitution	20 don't recall. I don't recall when that
21	basically, so. But as a woman, it's -- it's very	21 conversation happened. But I do remember the --
22	difficult to deal with.	22 her not going through the fundamentals of the
23	Q. Did your sexual relationship continue with David	23 class; at some point, we discussed that.
24	Voros throughout the time that you were employed	24 Q. But earlier I think you said that you weren't
25	at the university?	25 aware that she was the one teaching the class

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1 before you until this lawsuit; is that correct?		1 Q. Do you know if David Voros recommended you to
2 A. I was aware right up at the conversation about me		2 teach both of those classes?
3 teaching the class. But I -- I -- I didn't know		3 A. I don't.
4 Jaime really taught the figure structure class.		4 Q. Okay.
5 She doesn't -- I mean she's not -- I wouldn't say		5 A. I assume so but I don't know for sure.
6 her work is necessarily all figure based. I		6 Q. Why do you assume so?
7 wouldn't have assumed that she would have been		7 A. That he recommended me for the two classes?
8 teaching that class.		8 Q. Yes.
9 Q. Okay. I'm just trying to understand. So when		9 A. Because the semester went well, I had good
10 did David Voros -- when did you learn that she		10 student evaluations, I had faculty discuss my
11 was teaching that class before you?		11 performance with me in the hall.
12 A. The -- so I guess I didn't know Jaime was		12 Q. Okay. Did David Voros ever discuss the
13 teaching the class really up until we had our		13 allegation from Jaime Misenheimer regarding an
14 conversation but then he said, you know, I "had		14 incident where he -- where she is trapped in a
15 Jaime -- I was maybe going to have Jaime do it		15 closet with him?
16 but she" -- for those -- I don't remember what		16 A. Yes.
17 was said but, you know, "I'll give her a Painting		17 Q. Okay. Tell me what David Voros told you about
18 210 class and I'll have you teach the figure		18 that occurrence.
19 structure class."		19 A. That he was excited to show her this device, this
20 Q. Okay. Let's take one last break and we should be		20 ocular device, and at the time she seemed
21 able to wrap up after that.		21 excited, too. And it was a normal colleague to
22 (Off the Record from 12:10 p.m. until 12:31 p.m.)		22 colleague, "Let me show you this interesting
23 BY MS. BOWEN:		23 thing."
24 Q. Ms. Stasko, did David Voros require you to send		24 Q. Okay. Did he tell you that they were in a closet
25 him details regarding the hours and activities		25 when he showed her?
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1 you handled as a painting lab tech?		1 A. Yes.
2 A. No.		2 Q. Okay. Do you know whether he whispered in her
3 Q. Okay. Tell me about the oversight of David Voros		3 ear during that conversation?
4 in your position as a painting lab tech.		4 A. Do I know?
5 A. I didn't work with Dave at all. I worked with		5 Q. Yes.
6 Pam as a -- completely for the painting tech		6 A. I don't -- I wasn't there. I don't --
7 position.		7 Q. Did he tell you that he whispered in her ear?
8 Q. Okay. And in that position, you weren't required		8 A. No.
9 to send details of the hours or activities you		9 Q. Okay. Did David Voros tell you that Jaime
10 were working?		10 Misenheimer is not Native American?
11 A. No.		11 A. No.
12 Q. And am I right that in spring 2017, you were		12 Q. Did he ever express to you any opinion on her
13 teaching Arts 232 and Arts 233?		13 ethnicity?
14 A. I don't know for sure. I started with one class		14 A. Nobody doubts, neither him nor Blake nor I,
15 and then the next semester it was two classes.		15 nobody doubts that she's got some Native American
16 So I don't know if that's accurate or not.		16 blood in her and that was never a doubt. It just
17 Q. Okay. Why did your course load increase from one		17 seemed that the timing of that discovery or -- or
18 class to two classes?		18 feeling like she wanted that to be part of her
19 A. I believe because it was well received.		19 identity was relatively recent. I don't think he
20 Q. Okay. And who was it that was in charge of you		20 remembered anything in her studies that revolved
21 increasing your course load?		21 around her Native American heritage.
22 A. I worked a lot with Rebecca Boyd and I believe we		22 Q. Okay. And he told you that?
23 just had conversations that she thought another		23 A. Yes.
24 section would fill based on the popularity of the		24 Q. Okay. Did you tell a student that Ms. Bowers was
25 class.		25 intimidating?

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1 A. Did I tell a student -- no -- where? In person?	1 A. I would say primarily they're focused on David	
2 Q. Well, in any form?	2 Voros and a few other senior faculty but there's	
3 A. I don't recall, but I wouldn't -- I wouldn't put	3 certainly been boycotts regarding me. I mean	
4 it past myself to say that.	4 there were flyers that mentioned my name, there	
5 Q. What would have made you say that Ms. Bowers is	5 were balloons that said "Boycott 232." Lauren	
6 intimidating?	6 Chapman gave a lovely talk to the Carolina News &	
7 A. Her personality.	7 Reporter and repeated some false allegations.	
8 Q. Do you recall making any other comments to USC	8 Why everybody keeps repeating the false fact that	
9 students, faculty or staff about Ms. Bowers?	9 I was a student in 2016 is -- I don't know who's	
10 A. No.	10 dropping the ball on that regard but that	
11 Q. Do you recall making any comments about Jaime	11 patently false fact has been spread profusely in	
12 Misenheimer as a teacher to any students or	12 this events -- these events.	
13 faculty or staff?	13 Q. Okay. And before, you mentioned that they	
14 A. No.	14 weren't offering figure structure so that was a	
15 Q. Why did you leave the university?	15 portion of your decision to leave?	
16 A. Of South Carolina?	16 A. Yes.	
17 Q. Yes.	17 Q. Okay. When you originally set out to work at the	
18 A. Well, they're not renewing the figure structure	18 university, did you make it known to David Voros	
19 class or they're not hosting it. And I'm --	19 that you wanted to work the figure structure	
20 they're not hosting that class that I was	20 class?	
21 interested in teaching.	21 A. Can you repeat the question?	
22 Q. Okay. So immediately before you left, what	22 Q. Yes. Before you began working for the university	
23 classes were you teaching?	23 or at the time you began working for the	
24 A. It was very strange with COVID but it was a	24 university, did you tell David Voros that you	
25 combined section of 232, 233 and then an advanced	25 specifically wanted to work the figure structure	
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1 life drawing class.	1 class?	
2 Q. What are 232 and 233?	2 A. No.	
3 A. The Figure Structure I and Figure Structure II	3 Q. How did that come about that he chose you for the	
4 classes.	4 figure structure class?	
5 Q. And so they weren't offering figure structure	5 A. He -- I had moved back to Columbia, was getting	
6 after that?	6 settled in, picking up odd jobs, working here and	
7 A. They didn't offer it this past semester, no.	7 there, and he asked if I wanted the opportunity	
8 Q. And did you not want to work there if they didn't	8 to teach the class.	
9 offer figure structure?	9 Q. Okay. Was there any other conversation about	
10 A. I don't want to work there anymore. I -- I don't	10 teaching any other classes?	
11 -- that's a tough question to answer. I miss	11 A. No.	
12 teaching and I did love teaching that class but	12 Q. Did he know you had some kind of interest or	
13 everything that's happened, all of -- all of the	13 background in the figure structure?	
14 treatment that has occurred at the school, has	14 A. Well, I've, as I said, I've been studying the	
15 made me not so interested in working there.	15 figure my whole life. I studied -- I was in	
16 Q. Treatment towards you?	16 figure drawing classes all throughout undergrad,	
17 A. Yes.	17 I was awarded scholarships to Brookgreen Gardens	
18 Q. And what kind of treatment towards you are you	18 to study figure sculpture. I studied with Dave	
19 describing?	19 all three years, every Friday, in figure	
20 A. The student activists placing these flyers,	20 structure classes. I've made probably 19 life-	
21 making their online petitions and all of these	21 size ceramic figure sculptures. I stand behind	
22 things which all contain false allegations, in my	22 my work, I think my work shows my qualifications.	
23 mind, explicitly defamatory allegations about me.	23 And I'm very familiar with anatomy. I think the	
24 Q. Are the -- is the student activism focused on	24 -- the primary function of that class is to	
25 David Voros or you?	25 inform students of the structure of the figure	

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1 and its anatomy and I am very proficient in human	1 Q. Are you aware if he asked any other faculty	
2 anatomy.	2 members to go to Norway for that project?	
3 Q. Okay. Did David ever tell you that employees	3 A. Yeah. Sara Schneckloth, Mary Robinson, I know	
4 were complaining about your relationship?	4 those -- they both went. I'm sure he asked	
5 A. No.	5 others whose work could have been applied to that	
6 Q. When was it that you first learned about Jaime --	6 project but I -- those are the only three I know	
7 that Jaime Misenheimer was complaining about	7 for sure.	
8 potential inappropriate relations between you	8 Q. Okay. So other faculty members from USC did, in	
9 two?	9 fact, go to that -- Norway for that project?	
10 A. I don't really recall when I found out. I don't	10 A. Yes.	
11 -- I couldn't tell you.	11 Q. All right.	
12 Q. Do you recall telling Carrie Laird that Ms.	12 A. He wanted his children to come along, as well,	
13 Bowers were intimidating?	13 which was a big -- I think he wanted to try and	
14 A. I don't even recognize that name.	14 get Eli to come with him.	
15 Q. Okay. That's a -- you don't recall her being a	15 Q. Okay. In terms of encouraging people's artistic	
16 student for you?	16 development, if Jaime Misenheimer, if it was	
17 A. No.	17 known that she had an American Indian, Native	
18 Q. Okay.	18 American background, do you think that's	
19 A. Who? Carrie Laird?	19 something that David would have encouraged her to	
20 Q. That's what I have but it's very possible even my	20 investigate or develop as part of her artwork or	
21 own notes could be wrong.	21 projects?	
22 A. No.	22 MS. BOWEN: Object to the form.	
23 Q. Okay. Those are all the questions I have for	23 A. I don't know. Maybe. Dave always tries to	
24 you. Your attorneys may have some others.	24 encourage people to make work about themselves	
25 A. Sure.	25 and issues that are sincerely affecting them so	
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1 EXAMINATION	1 if that was something that her mind was on, I'm	
2 BY MR. WLODARCZYK:	2 sure he would encourage her to make work about	
3 Q. I do. Ms. Stasko, I'm Damon Wlodarczyk, I	3 that.	
4 represent David Voros. I'm sure you're aware of	4 Q. Okay. Aside from recency, are you aware of any	
5 that. Just a few follow-up questions. Going	5 projects that Jaime Misenheimer did that focused	
6 back to that Taiwan trip that you accompanied Mr.	6 on her or any Native American themes?	
7 Voros on, do you recall if that also involved	7 A. No.	
8 work related to his ownership of ICA?	8 Q. Okay. All right. That's all the questions I	
9 A. I would assume, yeah.	9 have. Thank you.	
10 Q. Okay. Do you have any personal information	10 EXAMINATION	
11 regarding what, if any, portions were paid by the	11 BY MR. GESSNER:	
12 university or ICA or him personally during that	12 Q. I've got one or two questions real quick. Did	
13 Taiwan trip?	13 you need to take a break?	
14 A. I have no idea what was funded by who.	14 A. No, I'm okay.	
15 Q. Okay. What's your recollection of what the	15 Q. All right. I should be quick. Earlier you spoke	
16 Norway trip was that was referenced before?	16 with Ms. Bowen about some of your activities on	
17 A. Dave was getting involved in this seed project.	17 social media; do you recall that?	
18 You know, he had mentioned Pam's family's history	18 A. Yes.	
19 with farming which is why he wanted to get her	19 Q. Okay. Any of those accounts you discussed or	
20 involved but that it was an art event about the	20 those posts that you discussed, were they -- were	
21 Seed Vault.	21 they a part of your job duties at the university?	
22 Q. Okay. And I believe you acknowledged that David	22 A. No.	
23 asked Ms. Bowers to go to the Norway -- or go to	23 Q. Before you posted anything on any of those	
24 Norway as part of that project?	24 accounts, did you run any of the content by	
25 A. Uh-huh.	25 anyone at the university?	

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1	A. No.	1	SIGNATURE
2	Q. That's something you did in your personal life,	2	I have read the foregoing deposition, and confirm
3	correct?	3	that it is a true and accurate transcript of my
4	A. Correct.	4	testimony. Any errors I may have noticed have been
5	Q. Okay. And you spoke with Ms. Bowen about some	5	listed below and returned to the court reporter.
6	comments you or Mr. Voros may have made about Pam	6	_____
7	Bowers or Jaime Misenheimer; do you recall that?	7	Alexandra Stasko
8	A. Yes.	8	Date: _____
9	Q. Can you recall if any of those comments were made	9	
10	while you were working at USC, and I mean	10	Page Line Correction Reason for Change
11	specifically during work hours while y'all were	11	
12	at the university?	12	
13	A. About their teaching or?	13	
14	Q. Yes.	14	
15	A. No.	15	
16	Q. Okay. Of course you and Mr. Voros are in a	16	
17	romantic relationship, correct?	17	
18	A. Yes.	18	
19	Q. Okay. So I assume y'all would have had some	19	
20	conversations at home, outside of work --	20	
21	A. Yeah.	21	
22	Q. -- in that environment?	22	
23	A. Yes.	23	
24	Q. Okay. Nothing connected with work though?	24	
25	A. No.	25	RE: Misenheimer/Bowers v USC/Voros
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1	Q. Okay. That's all the questions I have. Thank	1	CERTIFICATE
2	you.	2	Be it known that I, Kimberly C. Young, do hereby
3	A. Okay.	3	certify that ALEXANDRA STASKO appeared before me and I
4	MS. BOWEN: I have nothing further.	4	took the foregoing deposition at the time and place
5	(There being no further questions, the deposition	5	aforesaid by means of stenomask with backup; that I was
6	concluded at 12:40 p.m.)	6	then and there a notary public in and for the State of
7		7	South Carolina and that by virtue thereof, I was duly
8		8	authorized to administer an oath; and that the witness
9		9	was by me first duly sworn to testify to the truth, the
10		10	whole truth, and nothing but the truth.
11		11	I further certify that the foregoing transcript
12		12	represents a true, accurate, and complete transcript of
13		13	said deposition. This transcript may contain quoted
14		14	material; said material is transcribed as read or quoted
15		15	9 by the speaker.
16		16	I further certify that pursuant to Federal Rule
17		17	30(f)(1), a review of this deposition was requested.
18		18	18 Should the signature of the witness not be affixed to the
19		19	19 deposition, the witness shall not have availed
20		20	20 himself/herself of the opportunity to sign.
21		21	I further certify that I am neither employed by
22		22	22 nor related to any of the parties in this matter nor
23		23	23 their counsel; nor do I have any interest, financial or
24		24	24 otherwise, in the outcome of this action.
25		25	Witness my hand and seal this 23rd day of May,

S: /Kimberly C. Young/
 Kimberly C. Young
 Notary Public for South Carolina
 My Commission Expires: 08/14/2030