

EXHIBIT 24

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ALEXANDRA STASKO

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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 DISTRICT OF SOUTH CAROLINA</p> <p>3 COLUMBIA DIVISION</p> <p>4 Jaime Susanne Misenheimer,)</p> <p>5 Plaintiff,)</p> <p>6 v.)C/A No. 3:20-cv-04487-MGL-KDW</p> <p>7 University of South Carolina)</p> <p>8 and Davis Voros,)</p> <p>9 Defendants.)</p> <p>10 Pamela Jean Bowers,)</p> <p>11 Plaintiff,)</p> <p>12 v.)C/A No. 3:20-cv-04486-MGL-KDW</p> <p>13 University of South Carolina)</p> <p>14 and Davis Voros,)</p> <p>15 Defendants.)</p> <p>16</p> <p>17 DEPOSITION OF</p> <p>18 ALEXANDRA STASKO</p> <p>19 *****</p> <p>20 Monday, May 9, 2022</p> <p>21 9:36 a.m. - 12:40 p.m.</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2 Stipulations 4</p> <p>3 Examination by Ms. Bowen 4</p> <p>4 Examination by Mr. Wlodarczyk 78</p> <p>5 Examination by Mr. Gessner 80</p> <p>6 Signature Sheet 83</p> <p>7 Certificate 84</p> <p>8</p> <p>9 EXHIBITS</p> <p>10 Plaintiff's Exhibit Number 1 46</p> <p>11 (Bowers Amended Complaint)</p> <p>12 Plaintiff's Exhibit Number 2 63</p> <p>13 (Misenheimer Amended Complaint)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 The deposition of Alexandra Stasko was taken</p> <p>2 before Kimberly C. Young, a notary public in and for the</p> <p>3 State of South Carolina, commencing on May 9, 2022, at the</p> <p>4 law offices of Cromer Babb Porter & Hicks, 1418 Laurel</p> <p>5 Street, Columbia, South Carolina, pursuant to Notice of</p> <p>6 Deposition and/or agreement of counsel.</p> <p>7 APPEARANCES</p> <p>8 Attorney for the Plaintiff:</p> <p>9 Elizabeth Bowen, Esquire</p> <p>10 Nicholas Quatraro, Law Clerk</p> <p>11 CROMER BABB PORTER & HICKS</p> <p>12 1418 Laurel Street</p> <p>13 Columbia, South Carolina 29201</p> <p>14 beth@cbphlaw.com</p> <p>15 - - - - -</p> <p>16 Attorney for the Defendant University of South Carolina:</p> <p>17 Evan M. Gessner, Esquire</p> <p>18 DAVIS FRAWLEY</p> <p>19 140 East Main Street</p> <p>20 Lexington, South Carolina 29072</p> <p>21 evan@oldcourthouse.com</p> <p>22 - - - - -</p> <p>23 Attorney for the Defendant David Voros:</p> <p>24 Damon Wlodarczyk, Esquire</p> <p>25 RILEY POPE & LANEY</p> <p>2838 Devine Street</p> <p>Columbia, South Carolina 29205</p> <p>damonw@rplfirm.com</p> <p>26 - - - - -</p> <p>27 Also Present:</p> <p>28 David Voros - via Zoom</p> <p>29 Jaime Misenheimer - via phone</p> <p>30 Pamela Bowers</p>	<p>1 STIPULATIONS</p> <p>2 It is stipulated by and between counsel</p> <p>3 for the respective parties that all objections</p> <p>4 are reserved until the time of trial, except as</p> <p>5 to the form of the questions.</p> <p>6 This deposition is being taken pursuant to</p> <p>7 the Federal Rules of Civil Procedure.</p> <p>8 - - - -</p> <p>9 The reading and signing of this deposition</p> <p>10 is reserved by the deponent and counsel for the</p> <p>11 respective parties.</p> <p>12 Whereupon,</p> <p>13 ALEXANDRA STASKO, being duly sworn and cautioned</p> <p>14 to speak the truth, the whole truth, and nothing</p> <p>15 but the truth, testified as follows:</p> <p>16 EXAMINATION</p> <p>17 BY MS. BOWEN:</p> <p>18 Q. Thank you, Ms. Stasko. I know you've probably</p> <p>19 gone through this with the court reporter but if</p> <p>20 you would please state your full name for the</p> <p>21 record.</p> <p>22 A. Alexandra Stasko.</p> <p>23 Q. Okay. And is this the first time you've given a</p> <p>24 deposition?</p> <p>25 A. Yes.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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<p style="text-align: right;">Page 69</p> <p>1 before you until this lawsuit; is that correct?</p> <p>2 A. I was aware right up at the conversation about me</p> <p>3 teaching the class. But I -- I -- I didn't know</p> <p>4 Jaime really taught the figure structure class.</p> <p>5 She doesn't -- I mean she's not -- I wouldn't say</p> <p>6 her work is necessarily all figure based. I</p> <p>7 wouldn't have assumed that she would have been</p> <p>8 teaching that class.</p> <p>9 Q. Okay. I'm just trying to understand. So when</p> <p>10 did David Voros -- when did you learn that she</p> <p>11 was teaching that class before you?</p> <p>12 A. The -- so I guess I didn't know Jaime was</p> <p>13 teaching the class really up until we had our</p> <p>14 conversation but then he said, you know, I "had</p> <p>15 Jaime -- I was maybe going to have Jaime do it</p> <p>16 but she" -- for those -- I don't remember what</p> <p>17 was said but, you know, "I'll give her a Painting</p> <p>18 210 class and I'll have you teach the figure</p> <p>19 structure class."</p> <p>20 Q. Okay. Let's take one last break and we should be</p> <p>21 able to wrap up after that.</p> <p>22 (Off the Record from 12:10 p.m. until 12:31 p.m.)</p> <p>23 BY MS. BOWEN:</p> <p>24 Q. Ms. Stasko, did David Voros require you to send</p> <p>25 him details regarding the hours and activities</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. Do you know if David Voros recommended you to</p> <p>2 teach both of those classes?</p> <p>3 A. I don't.</p> <p>4 Q. Okay.</p> <p>5 A. I assume so but I don't know for sure.</p> <p>6 Q. Why do you assume so?</p> <p>7 A. That he recommended me for the two classes?</p> <p>8 Q. Yes.</p> <p>9 A. Because the semester went well, I had good</p> <p>10 student evaluations, I had faculty discuss my</p> <p>11 performance with me in the hall.</p> <p>12 Q. Okay. Did David Voros ever discuss the</p> <p>13 allegation from Jaime Misenheimer regarding an</p> <p>14 incident where he -- where she is trapped in a</p> <p>15 closet with him?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Tell me what David Voros told you about</p> <p>18 that occurrence.</p> <p>19 A. That he was excited to show her this device, this</p> <p>20 ocular device, and at the time she seemed</p> <p>21 excited, too. And it was a normal colleague to</p> <p>22 colleague, "Let me show you this interesting</p> <p>23 thing."</p> <p>24 Q. Okay. Did he tell you that they were in a closet</p> <p>25 when he showed her?</p>
<p style="text-align: right;">Page 70</p> <p>1 you handled as a painting lab tech?</p> <p>2 A. No.</p> <p>3 Q. Okay. Tell me about the oversight of David Voros</p> <p>4 in your position as a painting lab tech.</p> <p>5 A. I didn't work with Dave at all. I worked with</p> <p>6 Pam as a -- completely for the painting tech</p> <p>7 position.</p> <p>8 Q. Okay. And in that position, you weren't required</p> <p>9 to send details of the hours or activities you</p> <p>10 were working?</p> <p>11 A. No.</p> <p>12 Q. And am I right that in spring 2017, you were</p> <p>13 teaching Arts 232 and Arts 233?</p> <p>14 A. I don't know for sure. I started with one class</p> <p>15 and then the next semester it was two classes.</p> <p>16 So I don't know if that's accurate or not.</p> <p>17 Q. Okay. Why did your course load increase from one</p> <p>18 class to two classes?</p> <p>19 A. I believe because it was well received.</p> <p>20 Q. Okay. And who was it that was in charge of you</p> <p>21 increasing your course load?</p> <p>22 A. I worked a lot with Rebecca Boyd and I believe we</p> <p>23 just had conversations that she thought another</p> <p>24 section would fill based on the popularity of the</p> <p>25 class.</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Do you know whether he whispered in her</p> <p>3 ear during that conversation?</p> <p>4 A. Do I know?</p> <p>5 Q. Yes.</p> <p>6 A. I don't -- I wasn't there. I don't --</p> <p>7 Q. Did he tell you that he whispered in her ear?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did David Voros tell you that Jaime</p> <p>10 Misenheimer is not Native American?</p> <p>11 A. No.</p> <p>12 Q. Did he ever express to you any opinion on her</p> <p>13 ethnicity?</p> <p>14 A. Nobody doubts, neither him nor Blake nor I,</p> <p>15 nobody doubts that she's got some Native American</p> <p>16 blood in her and that was never a doubt. It just</p> <p>17 seemed that the timing of that discovery or -- or</p> <p>18 feeling like she wanted that to be part of her</p> <p>19 identity was relatively recent. I don't think he</p> <p>20 remembered anything in her studies that revolved</p> <p>21 around her Native American heritage.</p> <p>22 Q. Okay. And he told you that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Did you tell a student that Ms. Bowers was</p> <p>25 intimidating?</p>

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

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

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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	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	Should the signature of the witness not be affixed to the		
19			19	deposition, the witness shall not have availed		
20			20	himself/herself of the opportunity to sign.		
21			21	I further certify that I am neither employed by		
22			22	nor related to any of the parties in this matter nor		
23			23	their counsel; nor do I have any interest, financial or		
24			24	otherwise, in the outcome of this action.		
25			25	Witness my hand and seal this 23rd day of May,		
				2022.		
				S: /Kimberly C. Young/		
				Kimberly C. Young		
				Notary Public for South Carolina		
				My Commission Expires: 08/14/2030		