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1 as well?

2 A. I did.

3 Q. So do you remember where you went to go get
4 drinks?

5 A. Scapegoat.

6 Q. That's a bar called Scapegoat?

7 A. It is.

8 Q. Who ended up going?

9 A. Just me and Ms. Ugenti.

10 Q. Did you know that before you got there it was just
11 going to be the two of you?

12 A. I did.

13 Q. When you got there, was drinking involved? Tell
14 me what happened during that meeting.

15 A. Yes. We had about four beers at Scapegoat. And
16 by that point I knew we weren't going to be driving home, so
17 I invited [REDACTED] to come pick us up. And we went to a nearby
18 bar, Mexican restaurant, whose name is escaping me at the
19 moment.

20 Q. Did you drink more at the Mexican restaurant as
21 well?

22 A. We did.

23 Q. Do you remember what you had to drink there?

24 A. I remember having a few lemon drop shots.

25 Q. Did you become intoxicated?

1 answer any question.

2 I don't think that's the intent here. I think the
3 intent is for her to answer as much as she can without him
4 feeling it's over the top or something like that.

5 MR. SHIELDS: Sounds good.

6 Whatever you guys want to do, but for the record,
7 for the third time, I want to do everything I can do to make
8 sure [REDACTED] is not in contempt of that order because it's
9 pretty broad.

10 MR. WILENCHIK: Well, that's your definition. I
11 don't agree with that, but let's go on.

12 MR. SHIELDS: Okay.

13 MS. REBHOLZ: Okay.

14 BY MS. REBHOLZ:

15 Q. Before all of that, I was asking you what, when
16 you look back in retrospect, what was it that came to mind?

17 A. When we were still at Scapegoat, we were going
18 through her phone, and some images in lingerie accidentally
19 popped up.

20 And we also did body shots at the second bar.

21 MR. WILENCHIK: I didn't catch that, I'm sorry.

22 THE WITNESS: We also did body shots at the second
23 bar.

24 MR. WILENCHIK: Okay.

25

1 BY MS. REBHOLZ:

2 Q. And body shots off of each other?

3 A. Just off of her.

4 Q. At some point [REDACTED] came to pick you up?

5 A. He did.

6 Q. And that was from the Mexican restaurant?

7 A. It was.

8 Q. And did he also take Ms. Ugenti-Rita home?

9 A. He did.

10 Q. Do you know if he took her to her house or to
11 somebody else's house?

12 A. I don't know.

13 Q. Can you tell me about the car ride from the
14 restaurant to wherever you dropped off Ms. Ugenti-Rita, was
15 there anything about that that you look back on and seems
16 out of the ordinary?

17 A. The only thing I really remember is before
18 Ms. Ugenti got in the car, [REDACTED] looked over to me and said,
19 we're not going in that house no matter what.

20 Q. Did he ever explain to you why he said that?

21 A. I think the next day he told me he was just
22 worried about the vibe.

23 Q. You dropped Ms. Ugenti-Rita off at whatever
24 residence she told you to go to; is that fair?

25 A. Yes.

1 Q. And then from that point did you go back to your
2 house?

3 A. I did.

4 Q. You had talked earlier about inviting Brian
5 Townsend to come along with you.

6 Is it your understanding that Ms. Ugenti-Rita and
7 Brian Townsend were involved in a romantic relationship at
8 the time?

9 A. Yes.

10 Q. Do you know what their relationship was? Were
11 they dating? Were they engaged?

12 A. I think at that time they were just dating.

13 Q. To your knowledge had they been dating when you
14 were working with both of them at the Legislature?

15 A. There were rumors that I was aware of.

16 Q. So when you were working at the Legislature there
17 were rumors they were dating but nothing you knew
18 personally?

19 A. Correct.

20 Q. But by the time that you went out for your
21 birthday, they were out in the open dating; is that fair?

22 A. Yes.

23 MR. SHIELDS: It was her birthday.

24 THE WITNESS: It was Ms. Ugenti's birthday.

25

- 1 Q. Why did you suspect it was Ms. Ugenti?
- 2 A. It looked like her build.
- 3 Q. What was your reaction to receiving that text from
- 4 Mr. Townsend?
- 5 A. I was really distraught and freaked out.
- 6 Q. What, if anything, did you do at that point? Did
- 7 you write him back?
- 8 A. I woke [REDACTED] up to show him, and I didn't say
- 9 anything back to Brian.
- 10 Q. Now, is this kind of like on a Friday to Saturday?
- 11 A. I believe the happy hour was on a Tuesday, so this
- 12 would have been Wednesday morning.
- 13 Q. And you said you didn't write any response back to
- 14 Brian?
- 15 A. Correct.
- 16 Q. Did you delete the text?
- 17 A. I saved the photo but deleted the text.
- 18 Q. Was there anything in the text thread other than
- 19 the, hey, wish you were here, from the night before?
- 20 A. I deleted the texts throughout that night, so I
- 21 couldn't see our messages, because we just didn't ever text,
- 22 so I knew I wouldn't need it again.
- 23 Q. Why did you save the photo?
- 24 A. I didn't know what to do with it, but I knew that
- 25 I was freaked out and that it was wrong. And I think I

1 thought I would ask Ms. Ugenti about it one day.

2 Q. There weren't any word or suggestions that came
3 with that first text message to you?

4 A. No.

5 Q. After that Wednesday, you go back to work.

6 Do you have any interaction with Ms. Ugenti-Rita
7 or with Brian? Walk me through that.

8 A. I texted with Ms. Ugenti a little the next day.

9 MR. MASSEY: This would have been Wednesday?

10 THE WITNESS: Yeah.

11 BY MS. REBHOLZ:

12 Q. What did you text with her about?

13 A. You know, just how bad I was feeling because we
14 were drinking so much the night before. And I just wanted
15 to kind of gauge after that photograph was sent how our
16 interaction would have been.

17 Q. What was her response? How was your interaction?

18 A. It was short. I believe just a few texts back and
19 forth about how awful we both felt.

20 Q. Did you mention the photograph at all to her?

21 A. I did not.

22 Q. Why not?

23 A. I was freaked out. I didn't know what to do.

24 Q. At some point in time it's my understanding you
25 received another text message; is that correct?

1 A. That is correct.

2 Q. When was that?

3 A. I was at my cousin's wedding in Colorado, so I
4 believe it was July, a couple weeks later.

5 Q. What was that a text message of?

6 A. It was a picture of Brian going down on a woman.

7 Q. Could you tell who the woman was?

8 A. No.

9 MR. MASSEY: What was your response?

10 THE WITNESS: No.

11 BY MS. REBHOLZ:

12 Q. Was there text words that went along with that?

13 A. Yes.

14 Q. What was that?

15 A. I believe something along the lines of she wants
16 you to be with us.

17 Q. Did you know who the she was that he was referring
18 to?

19 A. I assumed Ms. Ugenti.

20 MR. SHIELDS: Are you okay?

21 THE WITNESS: Yeah.

22 MR. SHIELDS: Okay.

23 BY MS. REBHOLZ:

24 Q. Again, any time you need to take a break, let me
25 know. Okay?

1 BY MS. REBHOLZ:

2 Q. So before I went off the record, I asked you what
3 happened after you got that last text message. You were
4 with [REDACTED] at the wedding.

5 A. Yes.

6 Q. What happened after that? Did you have any other
7 interaction with Mr. Townsend or Ms. Ugenti-Rita?

8 A. I did not.

9 I don't remember the timeline, but I received a
10 third photo. I think it was similar in nature. And he
11 said, if you're not interested, you should say so.

12 Q. When you say similar in nature, was it similar in
13 nature to the first one where it was just the naked woman or
14 was it similar in nature with the sexual act in it?

15 A. The second one.

16 Q. That's okay.

17 So, was it again depicting oral sex? Was it a
18 different kind of sexual act? Do you remember?

19 A. I believe it was the same photo, with a different
20 filter on it.

21 Q. And it said if you're not interested you should --

22 A. Say so.

23 Q. -- say so.

24 Did you respond to that?

25 A. I did.

1 Q. What did you respond?

2 A. I said something along the lines of, sorry,
3 grandma goes to bed by 10:00, love you both, but not like
4 that, hope you're having fun at NCSL.

5 Q. What is NCSL?

6 A. The National Conference of State Legislators.

7 Q. When you said love you both but not like that, who
8 are you referring to?

9 A. Brian and Ms. Ugenti.

10 Q. And was it your belief that these photographs were
11 of Brian and Ms. Ugenti?

12 A. Yes.

13 MR. MASSEY: Objection to the form. Foundation.

14 MR. SHIELDS: Again, you don't mind her going into
15 this detail?

16 MR. MASSEY: At this point I don't.

17 MR. WILENCHIK: Did she answer that?

18 MS. REBHOLZ: She said yes.

19 BY MS. REBHOLZ:

20 Q. Why did you believe it was Ms. Ugenti-Rita?

21 A. He was soliciting a threesome.

22 Q. And what made you think that he was soliciting a
23 threesome?

24 A. He kept referring to a woman and all of us being
25 together.

1 Q. And he was dating Ms. Ugenti at the time?

2 A. Yes.

3 Q. What, if anything, did he respond to your text to
4 him?

5 A. Nothing.

6 Q. Did you ever bring any of this up to Ms. Ugenti?

7 A. I did not.

8 Q. Did you ever bring any of this up to anybody other
9 than to [REDACTED]

10 A. I did.

11 Q. Who did you tell this to?

12 A. [REDACTED]

13 Q. Who is [REDACTED]

14 A. She was [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. And what did you tell [REDACTED]

18 A. That Brian had been sending me photos following
19 the happy hour with Ms. Ugenti and that I was extremely
20 uncomfortable and didn't know how to handle it.

21 Q. What did she tell you?

22 A. She told me I needed to be direct and tell Brian I
23 wasn't interested.

24 Q. Did you tell anyone else about this?

25 A. I also told my boss, [REDACTED]

1 Q. Do you remember when you told [REDACTED] about
2 the photographs and the text messages?

3 A. After the first image.

4 Q. But before the other two?

5 A. Yes.

6 Q. And her advice was to be direct and say that you
7 weren't interested?

8 A. She had said that once multiples had come.

9 Q. So you continued to talk with her about this as
10 the texts kept coming?

11 A. Yes.

12 Q. Did she ever suggest reporting this to anybody
13 else?

14 A. No.

15 Q. You said you talked to your boss [REDACTED]
16 about it; is that correct?

17 A. Yes.

18 Q. What context did you talk to him about it?

19 A. I had shown him one of the images, and I told him
20 that I don't want to meet with Brian or Ms. Ugenti on my
21 own. So he had a situational awareness at the Legislature.

22 Q. Was this interaction with [REDACTED] was that
23 following an incident at the League of Cities and Towns?

24 A. I don't remember the timing exactly.

25 Q. Did you have an interaction with Ms. Ugenti-Rita

1 at an event that you were at with [REDACTED]

2 A. Yes.

3 Q. Was that the League of Cities and Towns?

4 A. It was.

5 Q. Do you remember about when that was?

6 A. That was August of 2016. I think it's the 23rd
7 through the 26th.

8 Q. And is that part of your job that you attend that
9 conference?

10 A. It is.

11 Q. And what do you do at that conference?

12 A. [REDACTED] as well as a lot
13 of state legislators, so we are there in a [REDACTED]
14 to make sure that they get where they need to be and. . .

15 Q. Is part of your job there that lobbying role that
16 you had talked about?

17 A. It is.

18 Q. And that requires you to interact with
19 legislators; is that true?

20 A. It does.

21 Q. And including Ms. Ugenti-Rita?

22 A. Correct.

23 Q. And in your role where you were with the [REDACTED]
24 [REDACTED] was Ms. Ugenti-Rita one of the legislators you would
25 have to interact with on a fairly regular basis?

1 A. Yes.

2 Q. Why is that?

3 A. She was the -- she had her own committee at the
4 time, I think it was still elections, but, yeah, she was a
5 prominent vote for us.

6 Q. Did you see Ms. Ugenti-Rita at that event in
7 August of 2016?

8 A. I did.

9 Q. Can you tell me about your interaction with her at
10 that event?

11 A. There was a happy hour or a reception before the
12 dinner that everyone attended, and we saw each other there.

13 Q. And what happened?

14 A. We were talking. We got a glass of wine at the
15 bar.

16 At this point I wasn't sure if she knew about the
17 images from Brian, and was hoping to gauge this interaction
18 to potentially bring them up to her.

19 There were a couple things at the reception that
20 occurred that made me feel uncomfortable, so I didn't bring
21 it up.

22 Q. What happened at the reception?

23 A. When we got a glass of wine from the bar, she
24 asked to take a selfie to send it to Brian.

25 That made me uncomfortable.

1 And she had asked me if I could tell that she
2 wasn't wearing a bra.

3 Q. Did you tell her that taking the selfie and
4 sending it to Brian made you uncomfortable?

5 A. I didn't.

6 Q. What about the comment about the bra?

7 A. I did not.

8 Q. Why did the comment about the bra make you
9 uncomfortable?

10 A. Because I had received those previous images from
11 Brian.

12 Q. So you decided you didn't want to bring up the
13 photographs with her?

14 A. I assumed at that time that it was likely that she
15 knew about them.

16 Q. Why was that?

17 A. Because both of those things made me feel like she
18 was interested sexually.

19 Q. Part of her demeanor with you that evening?

20 A. Uh-hmm.

21 MR. MASSEY: Objection to form.

22 BY MS. REBHOLZ:

23 Q. Was that a yes?

24 A. Yes.

25 MR. BERNSTEIN: Read that back.

1 (Record read.)

2 BY MS. REBHOLZ:

3 Q. After your interactions with her at the happy
4 hour, what happened then? Did you just stay there in the
5 bar? Did something else happen?

6 A. She kept asking me to go back to her room.
7 And I said I had to stay there to work and be
8 available for [REDACTED]

9 Q. About what time of day was it that all of this is
10 occurring? Middle of the day? Evening?

11 A. Evening.

12 Q. And at some point did something change to cause
13 you to actually go to her room?

14 A. It did.

15 Q. Can you tell me about that? What happened?

16 A. She saw my boss [REDACTED] from across the foyer and
17 ran to him and asked if she could steal me for a second.

18 And he said yes.

19 Q. What did you do at that point?

20 A. At that point we went back to her room.

21 Q. Did you want to go back to her room with her?

22 A. I did not.

23 Q. Did you feel comfortable telling her you didn't
24 want to go to her room with her?

25 A. I did not.

1 Q. What happened at that point?

2 A. We stayed in the room for a little while, just
3 chatting. She was kind of laid out on the couch, and I was
4 in a chair in the living room area.

5 Q. Was there anything about her actions at that point
6 that made you uncomfortable?

7 A. I felt like she was lying very provocatively, and
8 she kept asking me to stay long enough so that I could say
9 hi to Brian. Because I kept trying to make excuses to
10 leave.

11 Q. When you say she was lying provocatively, what do
12 you mean by that?

13 A. I felt like she was lying with her legs spread,
14 and if I had looked she may not have been wearing underwear.

15 MR. MASSEY: I'm going to interpose a belated
16 objection. Speculative. Object to the form.

17 BY MS. REBHOLZ:

18 Q. And she had previously told you she was not
19 wearing a bra; is that correct?

20 A. Correct.

21 Q. Were you trying to avoid looking at her?

22 A. I was.

23 Q. You also said she kept indicating that Brian was
24 on his way; is that correct?

25 A. Correct.

1 Q. Were you comfortable with that situation being in
2 her room?

3 A. I was very freaked out by the potential of Brian
4 getting there while I was still there.

5 Q. Why did that freak you out?

6 A. I felt like if Brian showed up, it would have put
7 me in a potentially dangerous situation.

8 Q. Were you comfortable being in the room with just
9 Ms. Ugenti-Rita?

10 A. I was not.

11 Q. And what about being in the room with just her,
12 even without Brian, was uncomfortable for you?

13 A. At this point I had fully realized that I believe
14 that she knew about the text messages and that she was
15 involved in the threesome request.

16 Q. Were you eventually able to leave the room?

17 A. Yes.

18 Q. How did that come about?

19 A. I texted my boss and asked him to call me and say
20 that I needed to come back to the main area.

21 Q. And did he do that?

22 A. He did.

23 Q. Did you have a conversation with him once you got
24 back to the main area?

25 A. I did, but I don't remember the details of it.

1 Q. We were also able to take [REDACTED] deposition.

2 He described for us that you had a conversation
3 with him about how to avoid interacting with
4 Ms. Ugenti-Rita.

5 Do you remember that?

6 A. I don't.

7 Q. Did you at any point have a conversation with
8 [REDACTED] about how to do your job without having to
9 interact with Ms. Ugenti-Rita and Mr. Townsend?

10 A. Yes.

11 Q. Can you tell me about that conversation.

12 A. It was just that. I told him I was extremely
13 uncomfortable having to meet with them alone, and I wanted
14 him to be aware of that dynamic.

15 Q. Was he responsive to that?

16 A. He was.

17 Q. So at this point when you were working for [REDACTED]
18 [REDACTED] you were working at some level as a lobbyist
19 with Ms. Ugenti-Rita; is that true?

20 A. Correct.

21 Q. You indicated that you had left the House of
22 Representatives in [REDACTED]; is that right?

23 A. Yes.

24 Q. Why did you choose to change jobs?

25 A. [REDACTED] had come to me with this open position, and

1 I thought that it would be a good fit.

2 Q. While you were working at the House, had you ever
3 had any interactions with Ms. Ugenti-Rita that made you
4 uncomfortable, like they did once you started lobbying her?

5 A. No.

6 Q. You left your employment at the House in fairly
7 good terms with her.

8 Is that a fair statement?

9 A. Yes.

10 Q. It wasn't until you started lobbying and started
11 working with her in that capacity that things got
12 uncomfortable for you?

13 A. Correct.

14 Q. You understand that at some point Ms. Ugenti-Rita
15 posted about being sexually harassed while she was working
16 at the House; is that true?

17 A. Yes, I know that.

18 Q. Did you ever read what she had posted?

19 A. I read some of it.

20 Q. How did that make you feel reading what she
21 posted?

22 MR. MASSEY: Objection to the form.

23 MS. REBHOLZ: You can answer.

24 THE WITNESS: It made me feel like she was being a
25 hypocrite.

1 A. No.

2 Q. There was another lobbyist there with you?

3 A. Yes.

4 Q. Any other interactions with Ms. Ugenti-Rita before
5 the investigation began?

6 A. No.

7 Q. Like I said, at some point during the House
8 investigation you were contacted.

9 Who contacted you initially?

10 A. The investigator.

11 Q. When they contacted you, how did that go? What
12 was that initial contact like?

13 A. They had called my work phone. I was scared. I
14 didn't know how he had got my name. And I didn't want to
15 participate.

16 Q. Why didn't you want to participate?

17 A. I thought that I had navigated the situation well
18 enough to come out on the other side and still have
19 maintained a fine relationship with Ms. Ugenti.

20 Q. You wanted to be able to maintain a working
21 relationship with Ms. Ugenti?

22 A. I just didn't want to be seen as a target.

23 Q. What do you mean by that?

24 A. For Brian and Ms. Ugenti.

25 Q. What do you mean seen as a target?

1 A. They are both powerful people in Arizona politics,
2 and I didn't want them to affect any future career
3 opportunities or harm me in any other potential way.

4 Q. Were you afraid that that would happen if you came
5 forward?

6 A. Yes.

7 Q. Did you eventually agree to be interviewed?

8 A. I did.

9 Q. Were you interviewed by yourself or were you
10 interviewed with anybody else?

11 A. By myself.

12 Q. Can you tell me about that interview? What did
13 you talk to the investigators about?

14 MR. SHIELDS: For the record, I was present during
15 that interview.

16 MS. REBHOLZ: Okay.

17 THE WITNESS: During that interview we talked
18 about the happy hour and the night out and the text messages
19 that proceeded that happy hour. Also told the investigator
20 about the League conference and the events that I've
21 outlined today.

22 BY MS. REBHOLZ:

23 Q. Were you interviewed just once or was it multiple
24 times?

25 A. Just once.

- 1 Q. Did you provide any documents to the
2 investigators?
- 3 A. I did.
- 4 Q. What did you provide for them?
- 5 A. I provided copies of the text messages and photos.
- 6 Q. So both the words and the photos?
- 7 A. Yes.
- 8 Q. Do you know if [REDACTED] was interviewed as well?
- 9 A. He was.
- 10 Q. Did you give any other names of people for them to
11 follow up with regarding what had occurred?
- 12 A. [REDACTED]
- 13 Q. Anybody else?
- 14 A. Not that I remember.
- 15 Q. Do you know if [REDACTED] was ever contacted by
16 any investigators?
- 17 A. I don't believe he was.
- 18 Q. Did you get to see a copy of the House report
19 before it was released?
- 20 A. No.
- 21 Q. Were you made aware of the House investigator's
22 findings with regards to your allegations before the release
23 of the report?
- 24 A. Yes.
- 25 Q. How were you made aware?

1 A. He called me.

2 Q. The investigator, Mr. Morgan?

3 A. Yes.

4 Q. Can you tell me about that conversation?

5 A. He called and said that Brian was very emotional
6 and took complete blame for the photographs and the texts,
7 and he believed Brian's account.

8 He told me that Ms. Ugenti felt that I was a
9 victim in this, and that she was sorry that that had ever
10 happened to me.

11 Q. Did he allow you to provide any additional comment
12 on what your thoughts were with those responses?

13 A. He did.

14 Q. Do you remember what you told him?

15 A. I said something along the lines of that I hoped
16 she didn't know about them.

17 Q. As you sit here today, do you think she knew about
18 them?

19 MR. MASSEY: Objection to the form. Foundation.

20 MS. REBHOLZ: You can answer.

21 THE WITNESS: Yes.

22 BY MS. REBHOLZ:

23 Q. Why do you think that?

24 MR. MASSEY: Same objections.

25 MS. REBHOLZ: You can answer.

1 THE WITNESS: Obviously the texts and the photos
2 from Brian, everything that happened at the League
3 conference and her demeanor, and incidents that have
4 occurred since the release of the House report to now.

5 BY MS. REBHOLZ:

6 Q. Did you read the House report?

7 A. I did.

8 Q. In the House report Brian Townsend's response
9 indicates that the texts and photos were sent to embarrass
10 or harass Ms. Ugenti-Rita.

11 Do you remember seeing that?

12 A. I did.

13 MR. WILENCHIK: I didn't hear that. I'm sorry.

14 BY MS. REBHOLZ:

15 Q. That they were sent to embarrass or harass -- hurt
16 or humiliate Ms. Ugenti.

17 Do you remember reading that?

18 A. I do.

19 Q. Was that the feel that you got from the texts when
20 they were sent to you?

21 MR. SHIELDS: Form and foundation.

22 THE WITNESS: That was not what I thought when I
23 received the texts.

24 BY MS. REBHOLZ:

25 Q. What did you think when you received the texts?

1 A. That he was soliciting a threesome.

2 Q. In the report it also mentions the event at the
3 League of Cities and Towns in a footnote.

4 Do you remember that?

5 A. Yes.

6 Q. And it essentially said that they didn't find that
7 to be material to the investigation.

8 A. Yes.

9 Q. Is that your understanding of what they found?

10 A. Yes.

11 Q. Do you agree with that assessment?

12 A. I do not.

13 Q. Why not?

14 MR. MASSEY: Objection to the form and foundation.

15 BY MS. REBHOLZ:

16 Q. You can still answer.

17 A. I think that what happened at the League
18 conference proved to me that she aware of what was going on
19 and that it was important for the entire scope of the
20 investigation.

21 Q. Your understanding was the investigation was to
22 try to determine whether or not there was any harassment
23 occurring at the Legislature.

24 Is that a fair statement?

25 A. Yes.

1 Q. Do you feel like you were being harassed?

2 A. Yes.

3 Q. Do you feel like that was accurately depicted in
4 the final report that was produced?

5 A. I do not.

6 Q. After this report was released did you have any
7 interaction with either -- when I say after, I'm going to be
8 in a very short period of time period. On the day -- couple
9 of days following the release of this report, did you have
10 any interaction with either Ms. Ugenti-Rita or Mr. Shooter?

11 A. I did not.

12 Q. Do you understand that Mr. Shooter mentioned you
13 anonymously as a victim in a letter he read on the House
14 floor?

15 A. Yes.

16 Q. How did you become aware of that?

17 A. I got a number of phone calls the morning that
18 Mr. Shooter released that letter, and that's how I learned
19 about it.

20 Q. Who did you get phone calls from?

21 A. The first one was from my friend [REDACTED]

22 [REDACTED]

23 Q. Had you told [REDACTED] about this whole situation?

24 A. I think she was aware, just through the gossip
25 mill.

1 Q. Anybody else? Who else called you?

2 A. Amy Lynn Pearce.

3 Q. And who is Amy Lynn Pearce?

4 A. At the time she was the deputy director of House
5 policy.

6 Q. What did you speak with her about?

7 A. She asked if I had anything to do with the letter,
8 if I had asked Mr. Shooter to write it. And she said that
9 Speaker Mesnard would like to speak to me about it.

10 Q. What was your response to her?

11 A. I said I had nothing to do with the letter. I was
12 just as shocked as everybody else. And that I would speak
13 with Speaker Mesnard.

14 Q. Your conversation with Ms. Pearce, was she
15 concerned about how you were doing? Was it kind of a --
16 what was her tone in that conversation?

17 A. We are friends.

18 I think she reached out primarily to set up the
19 phone call with the Speaker.

20 Q. Did you have a conversation with Speaker Mesnard?

21 A. Yes.

22 Q. Can you tell me about that conversation?

23 A. Yes.

24 I don't know who was in the room on his side of
25 things, everybody.

1 But he asked if I agreed with what the letter
2 said, if I had anything to do with it.

3 And I said I did not.

4 Q. You did not have --

5 A. Have anything to do with the letter that
6 Mr. Shooter released.

7 Q. Did you read the letter that Mr. Shooter released?

8 A. I did.

9 Q. Did you agree or disagree with the statements that
10 were in it?

11 A. I agreed with most of the statements in the
12 letter.

13 Q. Did you tell Speaker Mesnard that you agreed with
14 the statements in the letter?

15 A. I told Speaker Mesnard and the investigator that
16 once I had seen the full report I was surprised the incident
17 at the League wasn't more fully investigated, but I was more
18 upset that Mr. Shooter had released the letter and the
19 story.

20 Q. Why were you upset about the letter being
21 released?

22 A. It felt like a violation. And it was
23 embarrassing.

24 Q. Even though you agreed with the statements that
25 were in the letter?

1 A. Yes.

2 Q. Did Speaker Mesnard ask you if you agreed with the
3 statements in the letter?

4 A. I believe so.

5 Q. Do you remember what you told him?

6 A. What I just said, that -- yeah.

7 Q. That you were just upset about the letter but
8 didn't really address the statements?

9 A. That after seeing the full report I was surprised
10 that my entire story wasn't more fully investigated, so that
11 part was upsetting.

12 Q. Do you remember telling Speaker Mesnard that the
13 letter did not reflect your reaction to the report?

14 A. No.

15 Q. Did the letter that Shooter released, did it
16 reflect your reaction to the report?

17 A. Yes.

18 Q. Did you have any other interactions with
19 Speaker Mesnard or anybody else on the day of that release
20 or the day the letter came out?

21 A. Not that I remember.

22 Q. You said you aren't sure who was in the room with
23 Speaker Mesnard. Was there more than just him in the room?

24 A. Yes. I know the investigator was in the room and
25 I believe Josh Kredit, who was their counsel at the time,

1 and I think there were a few people. And Burr was on the
2 phone with me.

3 Q. Did Speaker Mesnard ever say anything about trying
4 to update the report to have a more accurate reflection of
5 what you thought had occurred?

6 A. I believe he offered.

7 I don't really remember that phone call very well.
8 It was intimidating to be on that line.

9 Q. Why was it intimidating?

10 A. Not every day the Speaker wants to talk to you.

11 And I didn't know a lot of people in the room, who
12 had previously been coworkers.

13 So it was embarrassing to be in that situation,
14 and uncomfortable.

15 Q. Were you concerned that if he continued to push
16 this are your identity would get out?

17 A. Yes.

18 Q. And that was something that you were afraid of?

19 A. Yes.

20 Q. Why was that something that you were afraid of?

21 A. I felt like if my name got out it could affect my
22 future career and my reputation.

23 Q. How did you think it could affect your reputation?

24 A. Just even being associated in all of this, and
25 having experiences that we've talked about.

1 Q. Was it difficult to come forward and tell your
2 story to the investigators?

3 A. It was.

4 Q. You were speaking a little bit earlier -- you
5 talked about some additional interactions that you've had
6 with Ms. Ugenti-Rita. Can you tell me about those?

7 A. Yeah, in December of 2018 I was at a MAG
8 conference, like a transportation summit, and I was
9 attending in my role [REDACTED] And Ms. Ugenti was present.
10 And near the end of the presentations I got up to go to the
11 bathroom. And [REDACTED] had texted me, Ms. Ugenti is headed
12 your way.

13 So I was already out of the bathroom at that time,
14 so I just looked down at my phone, and just assumed we would
15 walk right past each other, because we hadn't had any
16 interactions.

17 And she stopped me and got in my face, and said
18 everyone was going to find out what a liar I was.

19 Q. Did you have any interaction with her after that?

20 A. No.

21 Q. You just were able to walk away?

22 A. I just walked away.

23 Q. You said this was in December of 2018?

24 A. I think it was the 11th, yeah.

25 Q. Have you had any other interactions with her that

1 of this affected you?

2 A. It's been challenging.

3 Q. And I don't want to make you uncomfortable, but
4 can you tell me what about it has been challenging and how
5 that has affected you in your life?

6 A. It's caused a lot of anxiety and sleep problems.
7 And I think it's impacted my potential career growth, at
8 least in the present, as I've had to turn down job offers,
9 not knowing how all of this would play out.

10 Q. What job offers have you had to turn down?

11 A. I got a job offer with [REDACTED]

12 Q. And why did you turn that down because of this?

13 A. I didn't want to put a new potential employer at
14 any risk or risk being let go after everything came out.

15 Q. Have you had to miss time from work because of
16 this?

17 A. I've taken some sick days, yes.

18 Q. You had to hire an attorney?

19 A. Yes.

20 Q. Is that an expense that you had to pay personally?

21 A. [REDACTED] pays for Burr's services.

22 Q. Are you doing a little better now, or are you
23 still just as bad?

24 A. It's better now.

25 MS. REBHOLZ: I don't think I have any questions

1 for you, but I know some of the other attorneys will.

2 Thank you.

3 THE WITNESS: Okay. Thank you.

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

5 MS. REBHOLZ: Is that okay?

6 THE WITNESS: Yeah.

7 (Brief recess taken.)

8 BY MS. REBHOLZ:

9 Q. I know I said I was all done, but in an effort to
10 kind of move things along, I'm going to ask you a few
11 wrap-up questions and then I think we're going to pass it
12 over to Mr. Massey. Okay?

13 A. Okay.

14 Q. When we were talking earlier, you talked about the
15 House report and kind of had that footnote about
16 Ms. Ugenti-Rita and your interaction at the League of Cities
17 and Towns and that you felt that that should have been
18 included in the report.

19 Do you remember talking to me about that?

20 A. Yes.

21 Q. Did you explain to the investigators when you were
22 telling them about that incident that that incident coupled
23 with the text messages is what made you believe that
24 Ms. Ugenti-Rita knew about the text messages?

25 A. Yes.

1 A. Correct.

2 Q. Now, you indicated that you worked with
3 Ms. Ugenti-Rita mostly from [REDACTED] is that correct?

4 A. Correct.

5 Q. During that time do you remember Ms. Ugenti-Rita
6 ever mentioning to you any concerns that she had with Don
7 Shooter?

8 A. No.

9 Q. Do you remember her ever mentioning to you feeling
10 harassed in her role at the House?

11 A. No.

12 Q. I've asked you a lot of questions here today.
13 In you're thinking about this leading up to today,
14 is there anything that I haven't asked you about that you
15 think we should know about this whole situation?

16 A. The only thing I don't think I said was that
17 following the incident at the League conference I received
18 another text message from Brian with another photo and
19 message.

20 Q. What was included in that?

21 A. It was a picture of him having sex with a woman
22 from behind.

23 Q. What was the message attached to that?

24 A. Something along the lines of we heard you were
25 having fun with [REDACTED], presumably at the intergov party.

1 If you want to just be with her I can watch.

2 Q. Who was [REDACTED]?

3 A. [REDACTED] was a policy adviser at the time.

4 That part of the text message always confused me.

5 Q. And this was after you already had sent him the
6 text message saying I'm not interested?

7 A. The first message that I sent was along the lines
8 of love you both but not like that.

9 Following that text, I said, Brian, I'm not
10 interested, please stop messaging me.

11 Q. In the photograph he sent you following the League
12 of Cities and Towns incident, could you tell who the woman
13 was in the photograph?

14 MR. MASSEY: Objection; form and foundation.

15 THE WITNESS: No.

16 BY MS. REBHOLZ:

17 Q. Did you have a belief as to who you thought it
18 was?

19 MR. MASSEY: Objection; form and foundation.

20 THE WITNESS: I believe it was Ms. Ugenti.

21 BY MS. REBHOLZ:

22 Q. And why was that?

23 A. Because I had just had that interaction with her
24 in her room at the League conference, and Brian was not
25 there, and I had not messaged or talked to him at all.

1 But he was the one that sent the photograph of
2 them further soliciting a threesome.

3 Q. Just so I get a little bit of a timeline of events
4 here, the first photograph was June 21st, 22nd?

5 A. Yes.

6 Q. The other one was early July time frame?

7 A. Yeah.

8 Q. And then you think that same photograph may have
9 been sent to you a second time with a different filter?

10 A. Yeah. It's been a while since I've looked at
11 them, so I'm a little fuzzy on the timeline of when they
12 were sent, but between June 22nd and after the League
13 conference.

14 Q. And then the last one with him having sex with a
15 woman, that was after the League conference?

16 A. Yes.

17 Q. And about what time frame is that? Are we talking
18 late 2016?

19 A. The end of August, 2016.

20 Q. Anything else that we haven't talked about that
21 you think we should know about today?

22 A. At the time of the League conference I had been
23 weighing a job opportunity in the Governor's Office and
24 Brian would have been my supervisor in that role.

25 Q. Did the interactions with Ms. Ugenti-Rita at the

1 League of Cities and Towns affect your decision with regard
2 to that job?

3 A. Yes. I decided not to go for it.

4 Q. Anything else you think that we should know about.

5 A. No.

6 MS. REBHOLZ: Thank you again so much for being
7 here today.

8 MR. MASSEY: Anyone else have questions?

9 MR. WILENCHIK: No.

10

11 E X A M I N A T I O N

12 BY MR. MASSEY:

13 Q. I have a few.

14 If I understand your testimony correctly,

15 Ms. Ugenti never propositioned you for a threesome.

16 MR. WILENCHIK: Objection; form.

17 BY MR. MASSEY:

18 Q. Is that correct?

19 A. I believe that the interaction in the hotel room
20 was her attempt to lure me into a threesome.

21 Q. Did Ms. Ugenti-Rita ever say to you, I want to
22 have a threesome?

23 A. No.

24 Q. Did Ms. Ugenti-Rita ever send you a photograph?

25 A. No.

1 Q. Was Ms. Ugenti-Rita's face obvious to you or
2 apparent to you in any of the photographs that you did
3 receive?

4 A. No.

5 Q. All of the photographs you received were from
6 Brian Townsend; correct?

7 A. That's correct.

8 MR. BERNSTEIN: Objection.

9 BY MR. MASSEY:

10 Q. And you never brought these photographs up to
11 Ms. Ugenti and discussed it with her; correct?

12 A. That's correct.

13 Q. And if I understand you correctly, you were no
14 longer at the Legislature when the photographs with all
15 these instances or these events occurred; correct?

16 A. That's correct.

17 Q. You left the Legislature in 2015?

18 A. That's correct.

19 Q. Do you still have these photographs?

20 A. I do.

21 Q. Why do you still have them?

22 A. I want to protect myself.

23 Q. Okay.

24 Has anyone, to your knowledge, accused you of any
25 wrongdoing?

1 A. Not that I know of.

2 Q. If I understood your testimony earlier, when you
3 got the first text message from Brian you deleted the text
4 but kept the photograph; is that correct?

5 A. That's correct.

6 Q. And the photograph was embedded with the text
7 material as well?

8 A. I don't understand the question.

9 Q. Well, the photograph came with the text?

10 A. That's correct.

11 Q. So you had to separately save the photograph to
12 your photos and then delete the text; is that accurate?

13 A. I e-mailed the photo to myself and hid it in a
14 folder and deleted the text.

15 Q. Do you keep a diary?

16 A. Yes.

17 Q. And are all of these events discussed in your
18 diary?

19 A. I began keeping a journal at the time of the
20 investigation.

21 Q. So that would have been after Ms. Ugenti had her
22 press conference and talked about Mr. Shooter; correct?

23 A. Yes.

24 Q. What was your reason for starting a journal after
25 that date?

1 A. I started to see a therapist, and it helped to get
2 some of my anxiety with this experience onto paper.

3 Q. Were you having anxieties over issues unrelated to
4 this, these particular events as well?

5 A. No, primarily just this experience.

6 Q. Is this experience -- is it your testimony that
7 this experience is what led you to see a therapist?

8 MR. WILENCHIK: Objection; form.

9 Go ahead.

10 THE WITNESS: I believe -- yeah, primarily I
11 wanted a confidential space to be able to discuss what was
12 happening.

13 BY MR. MASSEY:

14 Q. About these events?

15 A. Yes.

16 MR. WILENCHIK: Objection; form.

17 BY MR. MASSEY:

18 Q. Did you have any other traumas in your life around
19 the time that you started this journal?

20 A. Not that I can recall.

21 Q. How about splitting up with your boyfriend? Was
22 that difficult for you?

23 A. Yes.

24 Q. Was that some of the things you would discuss with
25 the therapist as well?

1 I'm afraid of potential retribution of what she
2 may say about me to others.

3 And she's always had a reputation of seeking
4 retribution and being difficult to work with and. . .

5 BY MR. WILENCHIK:

6 Q. Is that also based on the commentary, as I
7 understand it, that you testified to, when you were leaving
8 the bathroom and she was heading that way, her comments to
9 you that you testified about?

10 A. Yes.

11 Q. Did you think those were appropriate?

12 A. No. I was very distraught. I had to take the
13 rest of the day off of work.

14 Q. Why did that concern you, same reasons?

15 A. Yes.

16 Q. Do you know how she knew at that point anything
17 about what you had told the investigators about?

18 A. Well, so that was a full year after the report's
19 release, so I knew that she already knew my involvement and
20 everything that had already transpired.

21 But I was surprised by her interaction with me
22 based on what I was led to believe were her feelings towards
23 the images in the text.

24 Q. Meaning what?

25 A. Meaning I was told that she felt very sorry for me

1 and she felt that I was a victim of Brian. And if he had
2 acted alone, it was surprising to me to have her be so
3 hostile and to say that everyone was going to find out I was
4 a liar.

5 Q. Did you know at that point in time when that
6 incident occurred outside the bathroom whether she was still
7 with Brian or not?

8 A. I had heard that they were traveling together in
9 March of that year. They were seen at the airport with all
10 of her kids.

11 Q. I think you were asked this, but I want to delve a
12 little bit deeper for my benefit.

13 You were asked about Brian at some point
14 indicating that he did this or he sent these -- you had
15 heard that he said he had sent these as some kind of, I
16 don't know, retribution against her or something to that
17 effect. Is that what your understanding was?

18 A. Yes, based on the report.

19 Q. I take it you don't buy that; right?

20 MR. MASSEY: Objection to the form.

21 THE WITNESS: I do not believe that.

22 MR. MASSEY: Foundation.

23 BY MR. WILENCHIK:

24 Q. Tell us why you don't believe that.

25 MR. MASSEY: Form and foundation.

1 THE WITNESS: Because they continued to have a
2 relationship, and I have heard that they are now married, so
3 it would be hard for me to imagine that if that were the
4 case that she would continue that relationship with him.

5 BY MR. WILENCHIK:

6 Q. And I want to follow up on a statement you made in
7 my questioning about, and I don't remember your exact words,
8 but something to the effect of when you saw the Shooter
9 letter or heard the Shooter letter that upset you.

10 Is that generally accurate?

11 A. Correct.

12 Q. What exactly about that letter, as you recall it
13 today, upset you?

14 Because part of that letter, as I've read it, is
15 Mr. Shooter extolling your virtues in coming forward and the
16 fact that what you said was not properly investigated and
17 calling upon people to investigate it.

18 Did that part upset you?

19 A. I was upset by that letter because I had never
20 spoken to Mr. Shooter or given him my permission to publish
21 my story, and I felt violated and like I was being used as a
22 pawn.

23 Q. Okay.

24 Other than that, was there anything about what he
25 was saying that you felt was factually inaccurate other than

1 Did I get some of that right?

2 A. It said something along the lines of, if you want
3 to just be with her, I can watch.

4 Q. Okay.

5 Be in the context of what you've been discussing
6 with us today, you felt clear in your mind that the her was
7 his girlfriend, Ms. Ugenti?

8 MR. MASSEY: Object to the form.

9 THE WITNESS: Correct.

10 BY MR. WILENCHIK:

11 Q. Was there anyone else that crossed your mind at
12 that point that he could be referring to?

13 A. No.

14 Q. I just want to repeat the exact words. If you
15 want to be with her -- is that what started out?

16 A. Something along those lines. Yes.

17 Q. That he could just watch?

18 A. Yes.

19 Q. At that point had you made it clear in your mind
20 that you didn't want to be with her?

21 A. Yes.

22 Q. And he's talking about her being his girlfriend;
23 right?

24 MR. MASSEY: Objection to form.

25 THE WITNESS: I believe so.

1 BY MR. WILENCHIK:

2 Q. Did you think that was pretty weird?

3 A. Yes. I was extremely uncomfortable.

4 Q. And if I got it right, you didn't respond to that
5 one; right?

6 A. That one I said, Brian, please stop messaging me,
7 I'm not interested.

8 Q. Okay. Got it.

9 And if I also understood you correctly, one of the
10 reasons why you felt convinced that Ugenti-Rita was clearly
11 involved in this with Townsend was the incident in the room
12 at the hotel; correct?

13 MR. MASSEY: Objection; form and foundation.

14 THE WITNESS: That is correct.

15 BY MR. WILENCHIK:

16 Q. I apologize, what was the hotel? What was the
17 name of it?

18 A. It was at the Scottsdale Princess.

19 Q. And you had said that she asked you to stay the
20 night; right?

21 A. Correct.

22 Q. And what was she wearing when she was on the
23 couch, to your best recollection?

24 A. She had the short sleeved purple turtle neck with
25 I believe a long black skirt.

1 Q. A long skirt?

2 A. Yes.

3 Q. Can you describe for us on the record, as best you
4 can recall it, how she was sitting on the couch and give me
5 more detail on it?

6 A. I was sitting on a chair catty-corner to the
7 couch. Her feet were closest to me, and her legs were kind
8 of spread.

9 Q. Like spread eagle?

10 A. Not exactly spread eagle, but to the point where I
11 feared if I had looked in that direction, I may see
12 something I didn't want to.

13 Q. Let me be clear on that one.

14 So I just want to flesh that out a little bit.

15 Did she hike her skirt up to sit in that position?

16 A. I didn't really look. I was trying to maintain
17 eye contact. But the way that she was sitting and how her
18 skirt was and her legs were, I felt like it was not
19 impossible for something to be showing.

20 Q. You felt that was inappropriate at the time, I
21 take it, how she was sitting?

22 A. Yes, I was uncomfortable about the entire
23 situation.

24 Q. Not having been there, of course, none of us here
25 can appreciate like you can, so I'm just trying to

1 Q. And the manner and the way she was talking to you,
2 did you feel it was obviously suggestive to put you at ease?

3 MR. MASSEY: Form and foundation.

4 THE WITNESS: For most of the conversation I tried
5 to keep the topic focused on work and work things.

6 I was weighing the potential job at the Governor's
7 Office. I remember soliciting her input there, since Brian
8 would have been my boss.

9 BY MR. WILENCHIK:

10 Q. You were trying, you said, to keep the
11 conversation on that level. Is that when you make that
12 point because you felt the conversation was trying to go off
13 that level on her end?

14 A. Yes. Because she had already invited me to stay
15 the night, and kept on insisting I stick around until Brian
16 get there. So I was trying to ensure the conversation
17 stayed professional.

18 Q. And you felt it was important enough given that
19 unease to contact your boss to have him give you an excuse
20 to get the heck out of there; right?

21 A. Yes.

22 Q. And would that be consistent with [REDACTED] if
23 I understand you earlier, if I heard you correctly
24 testifying to counsel, he said, no way are we going to spend
25 the night in that house?

1 MR. MASSEY: Objection to form.

2 THE WITNESS: That was after the happy hour, no
3 way are we going inside.

4 BY MR. WILENCHIK:

5 Q. Now you were inside her room and it was
6 uncomfortable; right?

7 A. It was.

8 Q. So what he was telling you now made sense?

9 MR. MASSEY: Objection; form and foundation.

10 THE WITNESS: It did.

11 BY MR. WILENCHIK:

12 Q. Ms. Ugenti-Rita said, wait until everyone finds
13 out what a liar you are.

14 If she's denied these incidents as you described,
15 she would be the liar, wouldn't she?

16 A. That's correct.

17 Q. And you believe 100 percent in your heart that you
18 are telling the truth; right?

19 A. Yes.

20 Q. And that she's the one lying?

21 A. Yes.

22 MR. SHIELDS: Objection; form and foundation.

23 BY MR. WILENCHIK:

24 Q. Did Mr. Shooter ever lie to you about anything
25 that you know of?

1 A. Uh-hmm. Yes.

2 Q. But on the other hand, you had personal knowledge
3 that Ugenti-Rita had sexually harassed you; correct?

4 MR. MASSEY: Form and foundation.

5 THE WITNESS: Yes.

6 BY MR. WILENCHIK:

7 Q. And that you felt was grounds to say that she
8 should be expelled?

9 A. Yes.

10 Q. And she never was, was she?

11 A. No.

12 Q. And no further investigation was ever done of her;
13 correct?

14 A. Correct.

15 Q. Do you find that odd having worked in the
16 Legislature?

17 A. I was upset by it.

18 Q. Did Ugenti-Rita ever contact you, other than the
19 one time you told us, did she ever contact you to simply
20 apologize for what happened or any perception that you had
21 of what happened to her?

22 A. No.

23 Q. Instead she just called you a liar; correct?

24 A. Correct.

25 Q. Did Ugenti-Rita ever explain to you what

1 inappropriate; isn't that true?

2 MR. MASSEY: Form and foundation.

3 THE WITNESS: I believe so.

4 BY MR. WILENCHIK:

5 Q. And because of that, you specifically tried to
6 avoid looking at her because it might have caused you to
7 look at something inappropriate further; correct?

8 A. Correct.

9 Q. And you said that if you looked she might not have
10 been wearing underwear.

11 Is that because of the statement she made about
12 her bra that you felt was also inappropriate?

13 MR. MASSEY: Objection; form and foundation.

14 THE WITNESS: That was part of it.

15 And I think because of the photographs that I had
16 witnessed leading up to that night.

17 BY MR. WILENCHIK:

18 Q. The nude photographs?

19 A. Yes.

20 Q. Did she say why she wanted you to wait to see
21 Brian?

22 A. She had said to say hi, to make sure I get an
23 opportunity to say hi to him.

24 Q. And any reason you in particular understood at the
25 time that you needed to say hi to Brian?

1 A. No. That's when I wanted to leave.

2 Q. That's what made you concerned?

3 A. Yes.

4 Q. You had no reason to be seeing Brian about
5 anything or saying hi; correct?

6 A. Correct.

7 Q. And you could have bumped into him somewhere
8 during this conference, but you certainly weren't going to
9 be seeing him in any room; right?

10 A. Correct.

11 Q. Particularly given what you had just told us about
12 the photos; right?

13 A. Yes.

14 Q. I may be old and don't understand these things,
15 but you said something about when you were at the bar that
16 you had some beers with her, she also drank?

17 A. Yes.

18 Q. You said four beers. Did that mean apiece or two
19 apiece or what?

20 A. We each had four beers.

21 Q. And you said something about body shots. I
22 apologize, because I'm not of this modern technology here,
23 so forgive me, is that a technological term or do you mean
24 you took photos of your bodies?

25 A. At the second establishment, the Mexican

1 restaurant, a body shot is Ms. Ugenti laid out on the bar,
2 and you put the alcohol in her belly button and lick the
3 salt from her stomach and take the lime out of her mouth.

4 Q. And you did that?

5 A. Yes.

6 Q. Did she do that with you?

7 A. No.

8 Q. Just you doing that with her?

9 A. Yes. And another woman at the bar.

10 Q. And did she ask you to do that, or how did that
11 come about?

12 A. I don't remember who initiated it.

13 Q. And let me ask you this. Based on what you drank
14 there, do you have a very clear recollection of what
15 happened in the -- was it an Uber that you took?

16 A. [REDACTED] had came to --

17 Q. I'm sorry, I apologize, [REDACTED] came to pick you up?

18 A. Yes.

19 Q. [REDACTED] hadn't been at the bar drinking; right?

20 A. I think maybe he had one beer with us.

21 Q. You felt you were obviously more intoxicated than
22 he was, so you relied on him to drive; right?

23 A. Absolutely.

24 Q. And do you think your recollection of the specific
25 events in that car might be a little affected by the fact

1 Q. You were pretty adamant that she was involved?

2 MR. MASSEY: Object to the form.

3 THE WITNESS: Yes.

4 MR. WILENCHIK: That's all I have. Thanks.

5

6 FURTHER EXAMINATION

7 BY MS. REBHOLZ:

8 Q. You are almost done.

9 A. Okay.

10 Q. Are you okay? Do you need to take a break?

11 A. No, that's okay.

12 Q. All right.

13 I just have a few follow-up questions for you.

14 All right?

15 A. Okay.

16 Q. You talked earlier, and I don't remember with who,
17 about the fact that you believe Ms. Ugenti-Rita had a
18 reputation of seeking retribution.

19 What did you mean by that?

20 A. As a staffer she had a very -- she had a
21 reputation of being very difficult to work with.

22 And part of that, when I say that, I mean as it
23 relates to bills or if she didn't get a bill across, she
24 would kind of, politics at play, I guess, be upset with
25 different lobbyists or different staffers or other members.

1 Q. And if she got upset with a lobbyist or staffer,
2 would that affect how she would work with them in the
3 future?

4 A. Yes.

5 Q. How would that affect it?

6 A. She would either potentially not meet with them,
7 or -- I'm trying to think of any specific examples.

8 I just remember feeling like once she felt like
9 someone had done her wrong or kind of -- the dynamic
10 changed, the relationship changed that she might have with
11 them.

12 Q. And it would be difficult for you to lobby
13 whatever your position would be?

14 A. Yes.

15 Q. Now, you talked a little bit about that when you
16 saw a counselor you also talked about splitting up with your
17 boyfriend.

18 Would that have been [REDACTED]

19 A. Yes.

20 Q. When did you guys break up?

21 A. [REDACTED]

22 Q. Had you already been going and seeing a counselor
23 for a pretty significant amount of time up to that point?

24 A. A couple months, yes.

25 Q. So the purpose of going to a counselor didn't have