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December 30, 2024

**VIA ELECTRONIC FILING**

Hon. Diane Gujarati  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz, et al.*, No. 23-cr-146 (DG)

Dear Judge Gujarati:

Defendants file this letter motion seeking various forms of relief related to the government's handling of witness Ayries Blanck and its endorsement of fabricated evidence, namely Blanck's "journals" that are identified on the government's exhibit list and referenced in its Motion *In Limine*. Defendants have repeatedly asked this Court to conduct an evidentiary hearing to explore government misconduct committed by agent McGinnis. [ECF Dkt. Nos. 113 & 227] To date this Court has declined to do so. Defendants' motion filed on December 12, 2024, remains pending and Defendants respectfully request that this Court rule on that motion and the instant one. Defendants contend that after an appropriate and needed evidentiary hearing, this Court should dismiss the indictment against the Defendants pursuant to Fed. R. Crim. P. 12. This Court has the discretion to dismiss an indictment based on deliberate government misconduct that rises to the level of a due process violation. *United States v. Hogan*, 712 F. 2d 757, 761 (2d Cir. 1983). This Court also has the discretion to consider other forms of relief. But absent an evidentiary hearing, Defendants continue to be denied the opportunity to demonstrate ongoing violations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *California v. Trombetta*, 467 U.S. 479, 485 (1984) that will ultimately deny Defendants a fair trial.

As alternative relief, Defendants seek to bar the testimony of Ayries Blanck where she has fabricated evidence at the behest or knowledge of McGinnis and continues to make false statements to the government that she presumably will repeat from the witness stand – all with the endorsement of the government and in violation of Defendants' constitutional rights under *Giglio v. United States*, 405 U.S. 150 (1972) and *Napue v. Illinois*, 360 U.S. 264, 269 (1959). If this Court refuses to grant any of the relief sought by the Defendants, it must at a very minimum give the Defendants the ability to meaningfully confront the evidence against them as required by the Confrontation Clause of the Sixth Amendment. Unless the government is willing to stipulate that the



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handwritten journals were transcribed from the final edited type-written journals at some time after March 2023, Defendants renew their motion for an order to issue subpoenas under Rule 17 to obtain google history and meta data from Ayries Blanck and her sister Autymn Blanck. [ECF Dkt. No. 213 and 214] Defendants further move for an order allowing a forensic expert to examine the handwritten journal entries that Ayries alleges were written in 2015. Notably, Defendants brought a motion seeking this relief on December 2, 2024, but withdrew the motion after the government represented that the issues would be resolved after an in-person meet and confer and a field trip to FBI offices. Suffice it to say, the issues remain unresolved. The only thing of value that came from the FBI visit was the discovery of even more misconduct on the part of agent McGinnis, namely his use of his personal email account to communicate with Ayries Blanck - email communications that were not produced and are now apparently destroyed.

Defendants have been ringing this bell for long enough. The government has been provided with ample evidence showing that: (1) its lead agent engaged in serious and repeated misconduct intended to suppress exculpatory evidence; and (2) Blanck's alleged journals and testimony about the circumstances under which she wrote those journal entries are fabrications. The government knows or should know that presentation of Blanck's testimony would constitute a Due Process violation. Defendants should not have to sit idly by as the government violates their right to a fair trial. Defendants respectfully ask this Court to conduct an evidentiary hearing related to the government's misconduct in connection with Blanck, her journals, and the other matters raised in its letter motion dated December 12, 2024. [ECF Dkt. No. 227] Short of a hearing, Defendants seek appropriate discovery that has been suppressed so that they may challenge Blanck's testimony, her journals, and McGinnis's misconduct.

#### A. Pertinent History

On September 13, 2023, the government made a Rule 16 disclosure of two PDF documents with type-written narratives that were described as "Journal entries regarding experiences at OneTaste maintained by Individual #10" Individual #10 is Ayries Blanck. The first PDF purported to be a set of a journal entries commencing on the date "January 15" ("Journal Set 1") [Exhibit A – Journal Set 1 (165920-165939) *filed under Seal*]. The second PDF purported to be a set of journal entries commencing on "February 24" ("Journal Set 2") [Exhibit B – Journal Set 2 (165940-165950) *filed under seal*] (collectively referred to as "Journal Sets") The government represented to defense counsel that the journal sets were written: (1) exclusively by Ayries Blanck; and (2) authored in 2015 after she left OneTaste. The government did *not* disclose that the type-



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written journal sets were associated with any handwritten journals. By failing to produce any handwritten journals or even acknowledge their existence, the government left Defendants with the false understanding that none existed.

Thereafter, suspecting that the type-written journals were written by someone other than Ayries and prepared for the Netflix movie,<sup>1</sup> Defendants retained Dr. Robert Leonard, a forensic linguist, to determine whether the type-written journals were written exclusively by Ayries. Leonard was not provided with any handwritten journals as the government was concealing the handwritten journals from the defense.

On July 18, 2024, counsel for Ms. Cherwitz, Duncan Levin, sent the AUSAs in this case an email seeking the metadata for Journals Set 1 and 2. [Exhibit D – Email Communication from Duncan Levin to AUSAs (7/18/2024) *filed under seal*] Mr. Levin’s communication also sought, *inter alia*, “the original journals or files” associated with the PDFs, any email communications which were received in connection with the journals, and the identity of the individual who sent the journals to the government.

On July 29, 2024, Mr. Levin followed up with the government again asking for the journal metadata, pointing out that Defendants may seek to have it analyzed. [*Id.*] On July 30, 2024, the government responded by sending two email communications showing that Ayries shared a document entitled “Journal Set 1” and “Journal Set 2” with Agent McGinnis on March 9, 2023, as a google document. [Exhibit E – Google Share: Ayries Blanck to Agent McGinnis (3/9/23)] The government did *not* produce a separate email communication from Blanck to McGinnis related to the journals that was sent to McGinnis’s clandestine Gmail account at the same time she forwarded the type-written journals.

On July 30, 2024, the government produced 217 pages of documents identified as “Photocopies of physical journals provided by Individual #10 (Ayries Blanck)” (ONETASTE00256871-ONETASTE00257087) (“Handwritten Journals”) [ECF No. 111, pg. 2] The government did not reveal when or how it received the handwritten journals, nor did it explain why they were produced nearly a year after the government’s disclosure of the type-written journals. The belated disclosure was particularly troubling since the

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<sup>1</sup> As pointed out in Defendants’ letter dated December 2, 2024, Defendants were initially suspicious about the provenance of the document since a version of the type-written journals produced in the civil case reflected a heading, “Series One: Darkness” that was removed from the version provided to the Defendants by the government. Either Ayries or agent McGinnis removed the heading, but the defense has no way of knowing which one is responsible, because the government has not produced the actual document McGinnis received. [Ex. C – Type Written Journals produced in Civil Case *filed under seal*]



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vast majority of the handwritten journals (191 pages) constituted *Brady* material that contradicts Ayries' claims of coercion.

Critically, the handwritten journals were produced less than six weeks before the due date for filing Rule 16 expert disclosures. The government did not disclose that any of the journal entries (type-written and/or handwritten) were authored by numerous people long after 2015 and for a Netflix documentary.

On September 23, 2024, undersigned counsel wrote a lengthy letter to the AUSAs, concerning the authenticity of the journals. Defense counsel noted that numerous pages of the handwritten entries were virtually verbatim to the previously produced type-written version while other handwritten entries written around the same time were largely exculpatory.<sup>2</sup> Defense counsel also noted that the handwritten entries that mirrored the type-written versions appeared out of place, markedly different in style to the other entries in the journal and almost looked as if they were written by someone else. [Exhibit F - Handwritten journal entries that mirror the type-written versions; Exhibit G - Other Entries in the journal] Defense counsel reminded the government of its *Brady* obligations and urged it to show its own due diligence when examining the authenticity of these journals. After raising these concerns, defendants specifically asked that the government to produce the following:

1. Any information the government has obtained or sought to obtain regarding the authorship of the type or handwritten journals, including the participation of anyone involved in the production of the Netflix film in the creation of the Journals.
2. Any information you have developed regarding when the handwritten Journals were prepared and when the type-written excerpts were first created, and any edits made to those excerpts by whom and when.
3. All facts regarding the transmittal to the government of the type and handwritten versions of the Journals, including the source of the documents, and the dates and manner of their transmittal.
4. The government's reasons for not producing copies of the handwritten journals prior to July 30, 2024.
5. Whether the government is aware and, if so, when it became aware, that the pages bearing Bates numbers 257041 through 257066 were likely written collaboratively or by someone other than Ayries Blanck.
6. Any actions that the government has taken or intends to take in response to discovering that the pages bearing Bates numbers 257041 through 257066 were likely written collaboratively or by someone other than Ayries Blanck.
7. The government's reasons for producing the Journals under Rule 16 rather than *Brady* material.

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<sup>2</sup> Journal entries during the same time-period do not corroborate Ayries' later claims of compelled sexual acts and are not particularly critical of OneTaste or the Defendants.



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8. Whether the government is in possession of the journal material that matches the 190 pages for the time period of January to March 2015 journal, and any explanation for why it has not been produced.
9. Any information the government has regarding the Label No. 2 and the January to March 2015 journal and the journal that was produced under.
10. Whether the government is still withholding any journals, handwritten or type.
11. Whether the government used any journals from Ayries Blanck with the grand jury in order to secure the indictment. [Exhibit H – Bonjean’s 9/23/24 Letter to AUSA Re: Ayries Blanck. journals] [ECF No. 160-1]

The government responded by stating that it did not have an obligation to produce the requested material.

At no point did the government disclose that the type-written journals were written/edited by multiple people or had been highly edited before being sent to agent McGinnis on March 9, 2023. Instead, the government led the Defendants to believe that the type-written journals were simply transcribed from the handwritten journal entries which were passed off as the “original” journal entries – a complete fabrication. In its Motion *In Limine* filed on October 11, 2024, the government continued to represent that the type-written journal sets were authored in 2015, pointing out that the journals are admissible pursuant to Federal Rules of Evidence 803(1); 803(2); and 803(3) – all of which require some showing that they were written at or near the time of the occurrence described. The government even claimed that the type-written journals should be admitted under the residual hearsay exception since they had “a high degree of trustworthiness” having been written close in time to her experiences at OneTaste.

On September 26, 2024, defendants sought intervention from the court, noting that the government appeared to be avoiding their *Brady* obligations. The letter motion to the court stated the following:

The material sought is immediately discoverable under Rule 16 and *Brady*. Defendants have the right to investigate the origins of these journals, who was responsible for writing them, and when they were authored. Defendants must be provided with complete discovery to prepare for trial, for consideration by potential experts, and to determine whether the government relied on fabricated evidence to obtain an indictment in this case. Accordingly, Defendants respectfully request that this Court order the government to produce the materials identified in the attached letter. [ECF Doc. No. 160 at 7-8]



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This Court denied Defendants' letter motion on September 27, 2024.

On November 15, 2024, the government disclosed for the first time by way of an affidavit from FBI agent Daniel Schmidt (dated October 29, 2024) that it received the handwritten journals from Ayries Blanck's sister Autymn Blanck who claimed she was "storing" the handwritten journals for her sister. [ECF Doc. No. 203] The handwritten journals were sent to the government on April 15, 2024. Autymn testified under oath that agent McGinnis advised her to send him the handwritten journals to avoid producing them to OneTaste lawyers in the civil litigation.<sup>3</sup> McGinnis sought to prevent OneTaste (and Defendants) from learning about this *Brady* material much like he urged Ayries to delete her email account to prevent her communications from being produced to the defense [Exhibit I – Excerpt of Transcript from Autymn Blanck deposition]. To be clear, the government did not disclose or even acknowledge the existence of the handwritten journals until July 30, 2024, nearly a year after producing the type-written journals.

The government also concealed from the defense that it was in possession of a separate hard drive allegedly belonging to Ayries Blanck that her sister sent to agent McGinnis on April 15, 2024. Some material from that hard drive was produced to the defense on November 15, 2024, **eight months after the government received it**. The government concedes that it may contain *Brady* material. To this day, the entirety of that hard drive is still being concealed from the defense. Defense counsel has not even been afforded an opportunity to look at the original hard drive of information, claiming that it contains attorney-client privileged documents. This Court has refused to order the production of the entire hard drive contents even though there is no question that Ayries waived any attorney-client privilege she enjoyed in the materials when she gave the hard drive to her sister who then gave it to agent McGinnis. [ECF Dkt. No. 239]

Last month, undersigned counsel obtained a copy of a Declaration prepared by an expert retained by OneTaste counsel in the California civil case which showed that Defendants' concerns about the authenticity of the journals was well founded. The Declaration attached here as Exhibit J was prepared by Jason Frankovitz of Quandry Peak Research on October 11, 2024. Mr. Frankovitz was provided with access to Autymn Blanck's Google drive link that she shared with her sister Ayries for the purpose of reviewing the edit history of Ayries' type-written journals (produced as Journal Sets 1 and 2 here). He prepared two videos that reflects when and how Journal Sets 1 and 2

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<sup>3</sup> Notably, the government has not produced any 302 memorializing this conversation, or any conversation, between agent McGinnis and Autymn Blanck about the transmittal of the journals.



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began and further reflects that Autymn Blanck, Ayries Blanck and film maker Sarah Gibson had editing privileges to the document.<sup>4</sup>

Frankovitz's forensic analysis showed that the type-written Journal Set 1 was created on May 4, 2022, and began as a series of thoughts, bullet points, and ideas. [Exhibit K, pg. 1] The document had 1893 words. It did not mention OneTaste, had no dates, and the writing looked nothing like a journal entry. This document then went through significant editing by either Ayries Blanck, Autymn Blanck, and a Netflix film maker Sarah Gibson as reflected in Exhibit B to Frankovitz's declaration attached as Exhibit J. In addition to Frankovitz's Declaration, Defendants have attached a collection of major revisions that Journal Set 1 underwent, starting with the document that was created on May 4, 2022, and ending with the document that was sent to McGinnis on March 9, 2023, which had 10,037 words. [Exhibit K] The embedded video shows that the editing of the document was being done on Autymn Blanck's Google drive and the final edited version was sent to Ayries Blanck before being sent to McGinnis on March 9, 2023.<sup>5</sup> [Ex. E] Inexplicably, the *final* edited document sent to McGinnis on March 9, 2023, is virtually identical to the hand-written entries that the government claims were written in 2015.

After the last court date, undersigned counsel was permitted to view the emails sent by Ayries Blanck to agent McGinnis on March 9, 2023. Blanck shared the document via her own Google drive with Agent McGinnis and metadata showed that he modified the document (or downloaded it) on March 10, 2023. A pdf file purporting to be the type-written journals was not sent to the defense until six months later. As noted above, after Defendants specifically asked the government to produce the original document sent to McGinnis and corresponding meta-data, the government instead sent a pdf reflecting that Ayries Blanck shared the Journal Sets as Google documents to McGinnis's FBI address on March 9, 2023. [Exhibit E] However, while viewing the emails at the FBI offices, counsel noticed that Ayries had sent an email to McGinnis using a "Confidential

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<sup>4</sup> [https://drive.google.com/drive/folders/127\\_rVMTy\\_fpM9SZPE8NWmQ5AJPOopGM5](https://drive.google.com/drive/folders/127_rVMTy_fpM9SZPE8NWmQ5AJPOopGM5)

<sup>5</sup> During Ayries civil deposition in the case *OneTaste v. Ayries Blanck*, she testified that she was not aware that edits had been made to the journals and stated that she had not seen the journals for over 10 years. [Exhibit L – Excerpt from Ayries Blanck Dep. *filed under seal*] Ayries reiterated this statement to the AUSAs as recently as October 15, 2024. [Exhibit M – 302 interview with Blanck dated November 5, 2024 *filed under seal*] However, after the filing of Defendants' December 2, 2024 letter bringing these matters to the Court's attention, the government reinterviewed Ayries Blanck on December 4, 2024. During this interview, she claimed that she *did* edit the journals from her sister's Google Drive under her sister's name. [Exhibit N – 302 interview with Blanck on 12/2/2024 *filed under seal*],



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mode” (which permits the sender to have the email self-destruct after a set period of time). [Exhibit P] The government admitted in an email sent the following day that Ayries Blanck “sent links to a Gmail address for SA McGinnis.” McGinnis then forwarded the links to himself at his FBI address. [Exhibit Q – Email sent to Counsel by AUSAs] For the first time on December 11, 2024, the government produced pdfs reflecting that McGinnis received the journals at his FBI email address by forwarding them to himself. The message that was sent in Confidential Mode was not preserved or produced to the defense and is no longer accessible (contrary to FBI policy). Moreover, the defense has absolutely no idea what document was sent to McGinnis at his personal Gmail account. The government has the ability to produce the journals that McGinnis downloaded on March 10, 2024, with meta-data and *his* edit history. The government refuses to do so.

Undersigned counsels were *not* permitted to review the contents of Ayries’ hard drive even though the government represented in court that counsel would have the opportunity to review the materials. The government has refused to provide a clone of the hard drive to the defense, claiming it won’t or can’t separate out this “privileged material,” which is not privileged in any event. Furthermore, the government did not make Ayries’ handwritten journals available to undersigned counsel.

B. An Evidentiary Hearing Is Demanded.

This Court has an obligation to ensure that the government does not present fabricated evidence and perjured testimony to a jury. As the United States Supreme Court held long ago, “the deliberate deception of a court and jurors by the presentation of known false evidence is incompatible with rudimentary demands of justice.” *Mooney v. Holohan*, 294 U.S. 103, 112 (1935). *See also, Giglio*, 405 U.S. at 153; *Napue*, 350 U.S. at 269.

After repeatedly claiming that the type-written journals were prepared in 2015, the government now concedes that the type-written journals were edited by various people for a different purpose, a Netflix movie. However, the government continues to represent that Ayries’ handwritten journal entries are the “original” entries, but this claim cannot be reconciled with the fact that the type-written journal entries that the governments now concedes was written as a group project and edited numerous times before being sent to McGinnis on March 9, 2023 is virtually identical to the handwritten entries that the government maintains was written in 2015. If Ayries’ statements were true and her sister merely transcribed her journals in 2015, then the Google document





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should have *started* with a verbatim account of the handwritten entries – not *ended* with it 10 months later.

Undersigned counsel has asked the AUSAs to explain how it is that a document that was created in May 2022 and went through hundreds of edits that resulted in final version in March 2023 happens to match a handwritten entry that was allegedly authored in 2015. The government can provide no explanation and neither can Ayries Blanck. There is no explanation other than the handwritten version was written *after* the final edited version, making the claim that it was written in 2015 a patently false one.

Ayries has demonstrated that she is prepared to give false testimony on this issue. At an October 1, 2024, deposition, which the government has listed as one of its proposed exhibits, Ayries said she first learned that Autymn had transcribed the journals “when I watched the Netflix documentary.” Ayries also said “I don’t remember what was in journals that I wrote ten years ago exactly.” When asked when was the last time she looked at the journals she replied, “Probably before I gave them to my sister [in 2015]. Maybe not even then.” In a statement to the government on October 15, 2024, Ayries confirmed this, the report noting, “BLANCK has not read her journals in over 10 years.” However, after the defendants December 2, 2024, filing, the government interviewed Ayries again, her 15<sup>th</sup> of 18 interviews, on December 4, 2024, where for the first time Ayries admitted that in 2022, using her sister’s google account, she “opened the type journals, read them, and made copies and edits to the typed versions of the journal for clarity.” Blanck went on to say she did this, “to explain things in a way for people to understand.” “Those people” were the 280 million Netflix subscribers who were the intended audience of the journals. Notably, Ayries Blanck was never admonished that making false statements to a federal agent is a crime.

Defense counsels’ recent visit to FBI offices to inspect McGinnis’s alleged email communications from Ayries Blanck on March 9, 2023, revealed more misconduct. First, the government cannot produce the type-written pdfs in their native form that were sent to McGinnis. His emails show that Blanck sent him two journals sets on March 9, 2023. Blanck gave McGinnis editing privileges to the second set of journals. McGinnis allegedly downloaded the documents the following day. But the “links” for those documents are no longer available, and the government cannot show what the documents looked like when McGinnis received them. The government contends that the documents were downloaded from the links as pdfs, but it has refused to produce the pdfs as they were first downloaded on McGinnis’s computer with corresponding meta-data. If the government made such a production, defense counsel could review the journals in the form they were received and determine whether the documents were altered. Specifically,



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defense counsel could discover whether the heading “Series One: Darkness” was removed by McGinnis or whether he received it without the heading.

Additionally, undersigned counsel discovered that when Ayries sent the journals to McGinnis, she also sent him a separate communication in “Confidential Mode” to a clandestine Gmail account. That communication was labeled “journals” and related to the journals she sent. That communication was not preserved and is no longer accessible according to the government. The government never produced evidence of this communication and defense counsel discovered it for the time during her December 4, 2024, meeting at the FBI offices. That McGinnis was using a clandestine Gmail account to communicate with Blanck, and perhaps other witnesses constitutes *Brady* evidence.

C. At the Very Least, Defendants Must Get Access to Ayries’ Edit History/Meta-Data and the Handwritten Journals So that Their Experts Can Examine Them.

As raised in Defendants’ letter motion filed on December 2, 2024, Defendants must be granted the appropriate data and access to the handwritten journals so their expert can examine it. [ECF Dkt. No. 212 and 213] Defendants have acted with due diligence but still cannot present the necessary expert testimony without access to the data and the handwritten journals. Defendants have repeatedly requested this information and material dating back to July and the government has continued to maintain that it has no obligation to produce it. The Court denied Defendants’ request for an order commanding the government to produce this *Brady* material. Once the Defendants learned through the Frankovitz report (last month) that the type-written journals were fabricated, the government conceded as much for the first time on December 4, 2024 (ECF Dkt. No 218). On the last court date, the government represented that this issue could be resolved by a simple review of McGinnis’s communications at FBI offices. That meeting resolved nothing and just provided additional evidence of McGinnis’s misconduct – which is getting national attention at this point in connection with another case.<sup>6</sup>

This motion is timely made where the government’s story about the provenance of these handwritten journals, which were not even produced until six weeks before expert disclosures were due continues to be a moving target with the narrative changing from day to day. The government’s recent in-court admission that the type-written version of the journals (which are identical to the handwritten entries) were edited by

<sup>6</sup> <https://www.newsweek.com/fbi-nxivm-crime-sex-cult-keith-raniere-2004375>



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multiple people stands in stark contrast to its representations to the defense over the past six months. Indeed, even as of the filing of their Motion *In Limine*, the government insisted that both the type written journal sets, and the handwritten journal entries were written in 2015 “close in time” to Blanck’s experiences at OneTaste. The government’s tune has now changed but it continues to take the untenable position that the handwritten versions are original without explaining why or how they could be identical to the type-written versions which *even* the government now concedes were edited and authored years later. If the government remains willfully blind to the fact that the handwritten journals were written *after* the type-written version in 2023, Defendants must be afforded the opportunity to present expert testimony to expose this truth. Defendants have retained an ink expert who can promptly conduct the necessary analysis with cooperation from the government.<sup>7</sup>

The government indicated in its Motion *In Limine* that it intends to present these journals as evidence corroborating Blanck’s in-court testimony. Defendants have a fundamental Sixth Amendment right to confront the evidence the government intends to introduce against them. This includes the right to challenge Ayries’ credibility along with her motives, bias, and interest. It certainly demands that Defendants have the tools with which to demonstrate that her “corroborating journals” are fabrications.

In addition to undermining Ayries’ credibility, such impeachment would call not question the integrity of the government’s investigation in this case. *See Kyles v. Whitley*, 514 U.S. 419, 449 n.19 (1995) (stating that various pieces of undisclosed evidence was relevant *Brady* evidence because it would have enabled the defendant to attack the “integrity” of the investigation, such as evidence undermining the “process by which the police gathered evidence and assembled the case”) *See also, Orena v. United States*, 956 F. Supp. 1071, 1100 (E.D.N.Y. 1997) (“Destroying the bona fides of the police is a tactics that has never lost its place in the criminal defense reasonable doubt armamentarium.”)

#### D. Conclusion

As detailed above, an evidentiary hearing is necessary to resolve the various issues related to the Ayries Blanck’s testimony, her journals, and the government’s role in assisting her fabrication of evidence or turning a blind eye to it. An evidentiary hearing should also cover those subject matters raised in Defendants’ motion filed on December

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<sup>7</sup> Attached as Exhibit O is a letter from a forensic expert detailing the necessary time and testing he would require to render his opinion.



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12, 2024, that remains pending before this Court. After a hearing this Court will be in a better position to decide whether dismissal is appropriate or whether Blanck's testimony should be barred. At the very least, Defendants must be afforded the right to discredit the evidence themselves through expert testimony. Defendants have been seeking this information from the government since mid-July with no cooperation. The government has been in possession of Ayries' handwritten journals and hard drive since April but did not produce the handwritten journals (which now appear on their exhibit list) until July 30, 2024, and November 15, 2024, respectively. These materials were clear *Brady* material that was specifically requested in July. The government repeatedly claims that it complied with its *Brady* obligations and had no obligation to provide anything beyond what was provided. Only *after* Defendants learned through an expert in the civil case that the type journals were created long after 2015 did the government admit as much. The government only made this concession *after* it was caught red-handed attempting to pass off fabricated evidence as authentic. Now the government has changed the issue and wants to focus only on the handwritten journal entries which mirror the type written versions and *are also fabricated*.

If the government seeks to present false evidence from Ayries Blanck to the jury and this Court declines to bar the evidence, Defendants are entitled to rebut it through expert testimony from both an ink expert and meta-data expert who can opine on the date of origin of the hand-written journal and how the original document (the type-written document) came into existence and was then transcribed on paper – not the other way around.

Respectfully Submitted,

/s/JENNIFER BONJEAN  
*One of the attorneys for Nicole Daedone*  
Bonjean Law Group, PLLC  
303 Van Brunt Street, 1st Floor  
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[Jennifer@bonjeanlaw.com](mailto:Jennifer@bonjeanlaw.com)

/s/ARTHUR AIDALA  
*One of the attorneys for Rachel Cherwitz*  
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212-486-0011

# EXHIBIT J

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

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ONETASTE INCORPORATED, a  
California corporation,  
  
Plaintiff,

vs.

AYRIES BLANCK, an individual; and  
DOES 1 through 100, inclusive,  
Defendants.

CASE NO. 22STCV33093

**REPORT OF JASON FRANKOVITZ**

**REPORT OF JASON FRANKOVITZ**

I, Jason Frankovitz, declare and state as follows:

**I. Qualifications and compensation**

1. I have been retained as an objective and neutral consultant by McPherson Law LLP to perform discovery in the above-captioned action.

2. I received a Bachelors’ degree in Telecommunications with Phi Eta Sigma honors from Indiana University in 1993. I have more than 25 years of experience working as a software developer, engineering manager, and system architect in a wide variety of industries including e-commerce, digital entertainment, mobile computing, and social media. I have also launched Internet startups using technologies like cloud-based server scaling, machine learning (artificial intelligence), and personalized ad targeting.

3. I have been a software engineer for a variety of large and small technology companies making web-based software and backend systems. I have been an instructor of technology- and Internet-related topics at San Francisco State University. For six years I was a member of the Los Angeles CTO Forum, a group of technology executives who meet to discuss computing challenges in their companies.

4. Over my many years of experience in the software and Internet industry, I have developed technical expertise in a variety of Internet and website technologies such as Transmission Control Protocol/Internet Protocol (TCP/IP), Hypertext Transfer Protocol (HTTP), the Domain Name System (DNS), Secure Sockets Layer (SSL), Common Gateway Interface (CGI), proxies,

1 client/server architectures, cloud computing, content management systems, relational databases,  
2 domain registration, and web forensics. I am also an expert in commonly used web programming  
3 languages, such as Ruby, Rails, PHP, Perl, JavaScript, Hypertext Markup Language (HTML), XML,  
4 Cascading Style Sheets (CSS), and asynchronous Javascript and XML (AJAX). I am also an expert  
5 in shell programming languages used on a wide variety of Unix operating systems and Linux  
6 distributions.

7           5. My experience with website administration, content management, and hosting dates  
8 back to the mid-1990s. I was the lead systems administrator for the first mailing list search engine on  
9 the Internet, Liszt.com (sold to Topica). In 1996 I designed and built the first bookmarking website  
10 in the world, itList.com, in 1999. During my work for the R&D group at yellowpages.com, I wrote  
11 programs that crawled the Internet to perform content analysis of webpages. I performed platform  
12 integration work for Koders.com, a source code search engine used by software engineers. As the  
13 founder and CTO of Seethroo, my online advertising company, I created a system for monitoring  
14 user-generated content on social websites to automate personalized ad targeting.

15           6. I have performed a variety of investigations and analyses for software patent  
16 infringement, software copyright, breach of contract, and software trade secret cases. Prior to working  
17 with Quandary Peak Research, I served as an intellectual property and technology advisor with  
18 TechKnow Consulting, providing a range of services in software-related matters including software  
19 patent licensing and brokerage. I also served as a software intellectual property consultant with  
20 Intellectual Ventures.

21           7. I was selected as Entrepreneur-in-Residence at Main Street Partners on the campus of  
22 the Massachusetts Institute of Technology from 1999 until 2000. I am the inventor of US Patent  
23 9,858,341 "Method And Apparatus For Remotely Monitoring A Social Website," issued January 2,  
24 2018.

25           8. I created curricula and taught courses covering programming principles, database  
26 fundamentals, Internet architecture, and computer hardware for several years at San Francisco State  
27 University, receiving the 2001 Outstanding Instructor award. I also mentored software development  
28 interns for four years from ENSEEIHT, a major engineering school in Toulouse, France.



1           9.       I have served as a consultant in software, the Internet, and website technology in over  
2 one hundred and thirty legal matters. I have given testimony in deposition or in court over twenty-  
3 five times.

4           10.       Attached hereto as Exhibit A is a true and correct copy of my curriculum vitae, which  
5 is current as of September 30, 2024 and accurately summarizes my background and expertise  
6 regarding the subject matter of this report.

7           11.       My analysis is based solely on the information made available to me at the time of this  
8 report.

9           12.       My employer, Quandary Peak Research, is being compensated for my work on this  
10 case at a base rate of \$575 per hour plus reimbursement of direct expenses. I have no personal interest  
11 in this litigation, and my personal compensation does not depend in any way on the opinions I express  
12 in this case or its outcome.

13           13.       I am not an attorney and nothing in this report should be considered an interpretation  
14 of any legal issue.

15           **II.     File “Journals”**

16           14.       The Google Doc file named “Journals” was created May 4, 2022, 9:43 AM (timezone  
17 unknown) by the Google account autymnblanck@gmail.com.

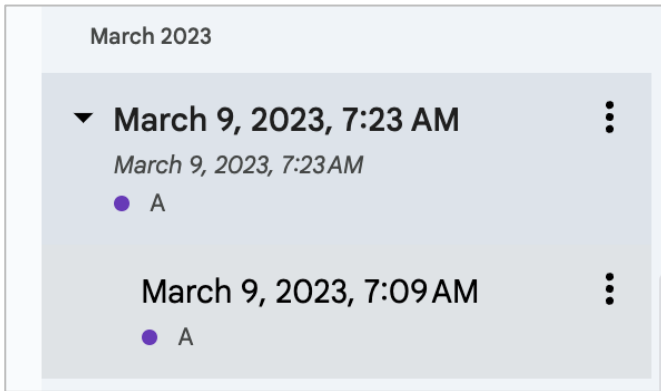
18           15.       The file appears to have 54 top-level versions, of which 33 are major versions which  
19 contain minor versions. The minor versions number in the hundreds.

20           16.       When the Journals file was originally created on May 4, 2022, 9:43 AM, it was blank,  
21 i.e. there was no content in the document. The first version that contained content was saved one  
22 minute later, on May 4, 2022, 9:44 AM. The size of this 9:44 AM version of the file, after exporting  
23 to my local computer, was 12 kilobytes, or approximately 12,000 bytes. Microsoft Word indicated  
24 the file has 1,893 words (or 9,849 characters including spaces) requiring three pages.

25           17.       The most recent version of the file was saved on March 9, 2023, 7:23 AM by a Google  
26 account identified only as “A” in the version history:

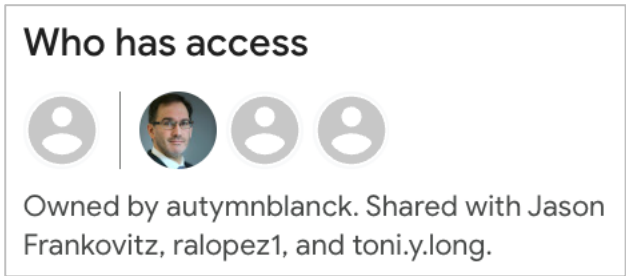
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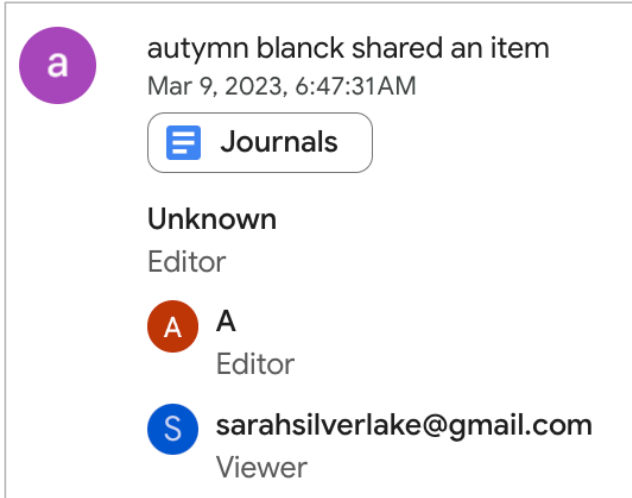


18. The size of this file, after exporting to my local computer, was 31 kilobytes, or approximately 31,000 bytes. Microsoft Word indicated the file has 10,037 words (or 52,988 characters including spaces) over twenty pages.

19. The file was shared with three other people, ralopez1, toni.y.long, and myself. All of us were given Editor access:

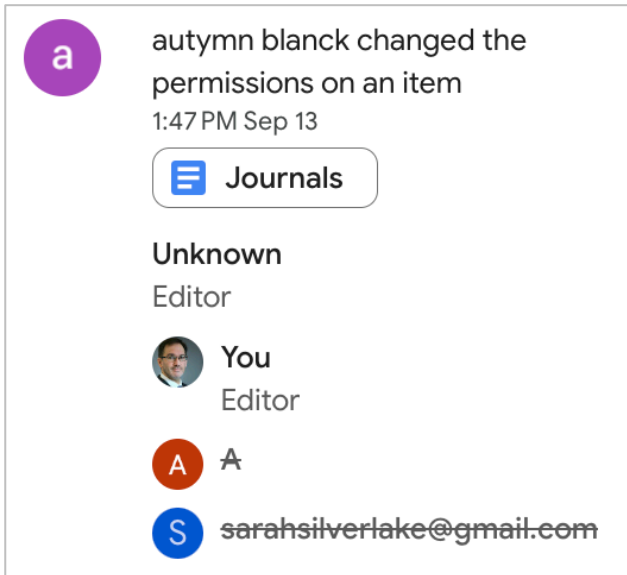


20. On March 9, 2023, the permissions for the file were changed to add "A" as an Editor and sarahsilverlake@gmail.com as a Viewer:



21. On September 13, 2024 the permissions were changed to remove "A" and

1 sarahsilverlake@gmail.com from the file, and I was added (to allow me to conduct discovery on the  
2 file and its history):



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7 **III. File “Journal 2”**

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14 22. The Google Doc file named “Journal 2” was created May 25, 2022, 10:43 AM  
15 (timezone unknown) by the Google account autymnblanck@gmail.com.

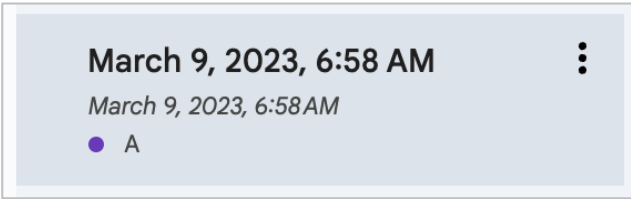
16 23. The file appears to have 4 top-level versions, of which 2 are major versions which  
17 contain minor versions. There are 18 minor versions.

18 24. When the Journal 2 file was originally created on May 25, 2022, 10:43 AM, it was  
19 blank, i.e. there was no content in the document. The first version that contained content was saved  
20 less than one minute later, on May 25, 2022, 10:43 AM. The size of this version of the file, after  
21 exporting to my local computer, was 19 kilobytes, or approximately 19,000 bytes. Microsoft Word  
22 indicated the file has 4,058 words (or 21,774 characters including spaces) requiring eleven pages.

23 25. The most recent version of the file was saved on March 9, 2023, 6:58 AM by Google  
24 account identified only as “A” in the version history:

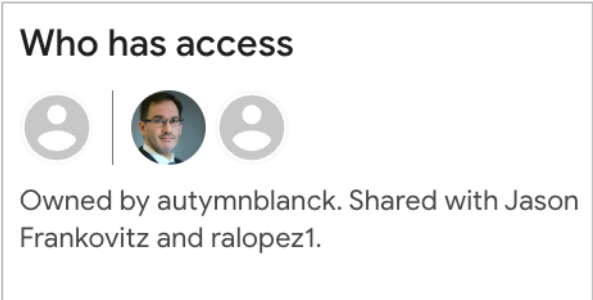
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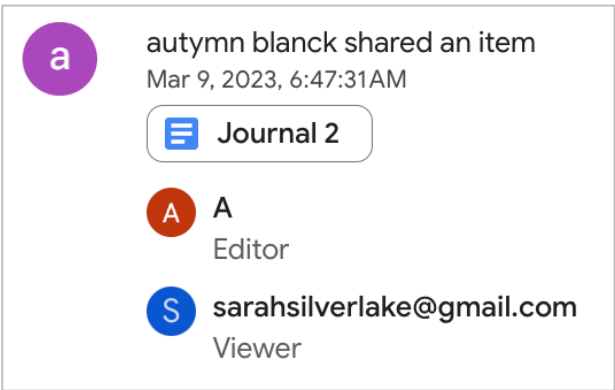


26. The size of this file, after exporting to my local computer, was 19 kilobytes, or approximately 19,000 bytes.

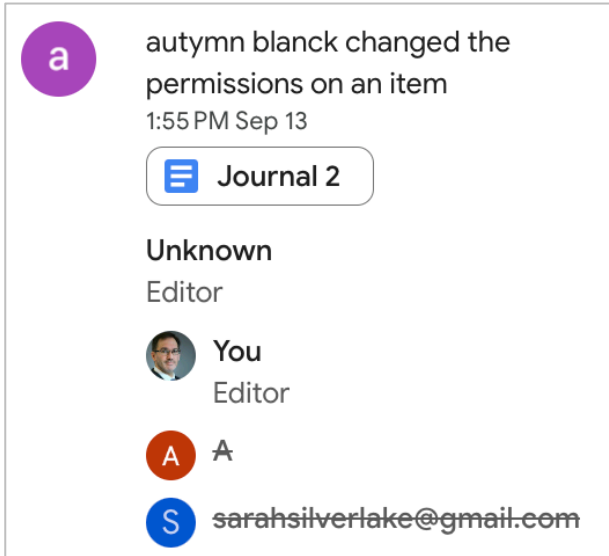
27. The file was shared with two other people, ralopez1 and myself. All of us were given Editor access:



28. On March 9, 2023 the permissions for the file were changed to add "A" as an Editor and sarahsilverlake@gmail.com as a Viewer:



29. On September 13, 2024 the permissions were changed to remove "A" and sarahsilverlake@gmail.com from the file, and I was added (to allow me to conduct discovery on the file and its history):



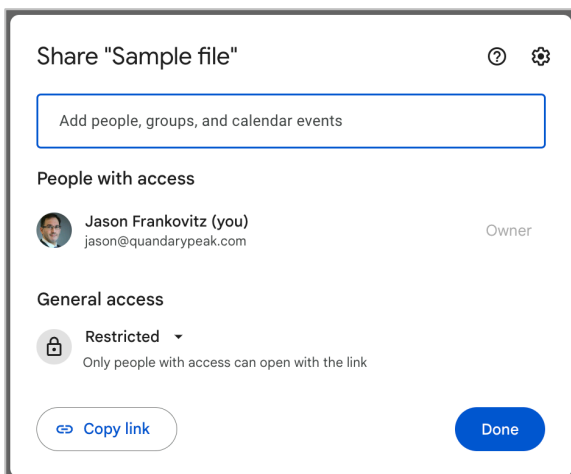
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#### IV. Google Docs access controls and roles

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30. Google Docs offers three roles for users of files: Viewer, Commenter, and Editor. Viewers and Commenters cannot see the version history of a file. Editors can see the entire history of the file after being granted the Editor role by the document’s creator (the document’s creator is granted the Editor role automatically).

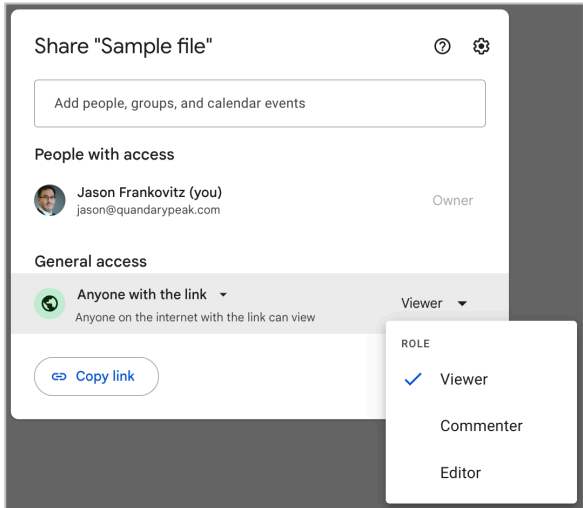
31. If the document owner shares the file, they can choose the level of access to it. The file’s default is Restricted access, which means only those users with explicit permission can access the file (and then that access is subject to the specific role or Viewer, Commenter or Editor granted to the user):



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32. If the owner of the file chooses the option “Anyone with the link”, they can also choose what the role of any user with the link will have when they visit the file:

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**V. Google logins**

33. To log in to a Google account, a person must use the email address of their Google account and the password. Typically, the person logging in to the account is the owner of the account. However, it is possible for someone other than the owner of the account to log in, provided they know the email address and the password. Once logged in, the person would essentially be impersonating the original user digitally, from Google’s point of view.

34. As of this writing, I have been granted access to five files owned by autymnblanck@gmail.com,<sup>1</sup> which were also shared with “A”, sarahsilverlake@gmail.com, ralopez1, and toni.y.long. I am unable to determine how many other files owned by autymnblanck@gmail.com were accessed by these users or possibly others.

35. If I were permitted to log in using the autymnblanck@gmail.com Google account, I would likely be able to determine if other files were shared with the abovementioned users, which additional files (beyond the five I currently can access) were shared, and if the five files shared with me were shared in the past with other users currently unknown whose access has since been revoked, and the IP numbers, locations and timestamps of the Google account login attempts.

I declare under penalty of perjury under the laws of the state of California that the foregoing

<sup>1</sup> The five files are named “Journals”, “Journal 2”, “Journals (Netflix)”, “Therapy Journal”, and “Reflections Series From Two weeks of Reconciliation [sic] work December 1-14th ish”.

1 is true and correct. Executed in Los Angeles, California on October 11, 2024.

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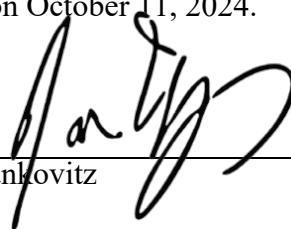
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Jason Frankovitz



Jason  
Frankovitz

Digitally signed by Jason Frankovitz  
DN: cn=Jason Frankovitz,  
o=Quandary Peak Research,  
email=jason@quandarypeak.com,  
c=US  
Date: 2024.10.11 17:39:17 -07'00'  
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**EXHIBIT A: JASON FRANKOVITZ CV**



# Jason Frankovitz

Director of Software Class Actions  
Senior Testifying Expert

323-545-3660

[jason@quandarypeak.com](mailto:jason@quandarypeak.com)

Quandary Peak Research  
205 S Broadway, Suite 300  
Los Angeles, CA 90012

[quandarypeak.com/jason](http://quandarypeak.com/jason)

## Professional Accomplishments

- Expert in software programming and Internet technologies with over **30 years of experience**
- Software inventor of **US patent 9,858,341** – "Method and apparatus for remotely monitoring a social website"
- **Testified 30+ times** as an expert in the US and Canada
- Reviewed code, authored affidavits, declarations and expert reports for **over 100 cases**
- Consulting on **multiple class actions** for social media & e-commerce technologies
- Built **the web's first social bookmarking site** in 1996, cited as prior art for multiple patent matters
- Selected as **Entrepreneur-in-Residence** at Main Street Partners on MIT campus
- Extensive **software intellectual property** experience focusing on **software patents & trade secrets, web and social media** technologies, software development **best-practices**, and digital **copyright/code theft**

## Employment

### Computer Scientist

Quandary Peak Research | Los Angeles, CA | Apr 2014–Present

- Providing software analysis, investigation and advising for software disputes.
- Performing forensic investigations of computer systems, including examination of digital data.
- Installing, configuring and using source code analysis tools for litigation support.
- Creating claim charts for patent infringement and invalidity analysis.

### Intellectual Property and Technology Advisor

TechKnow Consulting | Los Angeles, CA | June 2013–Apr 2014

- Provided consulting for a range of software-related matters including patent licensing, infringement, brokerage, and general software IP advising.
- Researched products and companies for similarities to patents being sold to maximize buyer interest.
- Interviewed inventors to help brokers understand a patent's potential sale value.

### Software IP Consultant

Intellectual Ventures | Bellevue, WA | Mar 2011–May 2013

- Provided technical analysis for patent licensing negotiations related to cloud computing, social networking, ecommerce, mobile, video games, operating systems, electronic gambling, travel, and imaging.

- Examined and investigated a variety of software technologies for potential patent infringement.
- Reverse-engineered numerous software systems to document system operations and services.
- Evaluated patent claims for likelihood of infringement and licensing potential.
- Scored patent portfolios for prioritizing licensing efforts.

## Founder & CTO

Seethroo.us | Bellevue, WA | Feb 2006–Feb 2011

- Launched online advertising and marketing startup specializing in social media.
- Created scalable cloud-based Ruby on Rails application for ad networks and publishers to manage advertising campaigns.
- Designed proprietary jQuery-based publisher integration system.
- Managed software engineering and used agile practices to drive test-driven development.
- Developed internal tool “brainiac” for creating and managing machine learning models for a natural language processing (NLP) system that analyzed user-generated content for targeted ads.

## Software Engineer

AT&T Interactive | Glendale, CA | Aug 2008–Dec 2009

- As a member of the R&D department, worked on various experimental/exploratory projects for AT&T Interactive’s Social Services team.
- Used Ruby and jQuery to co-develop an internal QA tool measuring relevancy of search results for yp.com.
- Wrote a large-scale web ad scraping system using Ruby and nokogiri (an XML parsing library).
- Contributed to the development and use of a REST-oriented framework written in Ruby.
- Wrote backend code powering an iOS/mobile application for reserving products from brick-&-mortar retailers.

Software Engineer

DialedIn.com | Los Angeles, CA | May 2007–June 2008

- Developed Ruby on Rails applications for a mobile event management product.
- Implemented group messaging features for email, Web, and SMS.
- Built multiple-stage development environment enabling uninterrupted service for end users.
- Wrote unit and functional tests and installed continuous integration services to find bugs faster.

## Segment Producer

TechTV, G4, and g-NET | San Francisco, CA and Los Angeles, CA | Apr 2002–Feb 2006

- Produced technology television segments for cable and online distribution covering consumer electronics product reviews, interviews with notable software leaders, and industry commentary and analysis.
- Pitched concepts, wrote scripts, booked talent, and shot and edited packages between 2 minutes and 9 minutes total running time.
- Coordinated with software companies to acquire demo products to meet production schedule.
- Maintained, administered, and upgraded lab hardware and content library.

## Founder & CTO

itList.com | Cambridge, MA | Apr 1996–Apr 2002

- Created the first online bookmark site in the world.

- Developed a complete suite of online tools to enable bookmark submission, sharing, storage, organization, searching, and user account management.
- Programmed a custom perl API to Mysql databases on Linux.
- Installed, configured, and customized Apache HTTPD with mod\_perl.
- Developed an infrastructure to rapidly deploy (<1 hour) partner sites for itList service.
- Handled technical support needs for 30,000 users.

## **Systems Administrator**

Liszt.com | Sebastopol, CA | Feb 1997–Apr 1999

- Provided Linux systems administration to a major online search engine.
- Debugged Apache, perl, and mod\_perl issues and monitored traffic and local CPU load.
- Implemented performance and security enhancements involving HTTPD, sendmail, POP3, telnet, SSH, and FTP.
- Performed automated backups nightly and scheduled downtimes for upgrades.

## **Certified ClearCase/Software Configuration Management Specialist**

Pencom Systems | Boston, MA | Sept 1996–Dec 1998

- Provided software configuration management (SCM) expertise in heterogeneous development environments (SunOS/Solaris, SCO, HP-UX, Windows NT.)
- Performed administration and configuration of ClearCase, CVS, RCS, and Visual SourceSafe systems.
- Gathered requirements, designed, deployed, and administered distributed development environments
- Implemented automated build systems for C, Java, and perl.
- Instituted code branching and version labeling policies.
- Audited software engineering to identify technical and procedural problems in development efforts.
- Wrote and taught ClearCase courses to development teams in the USA and United Kingdom.
- Coded programs for system monitoring and automatic backups.
- Designed and installed new server room layout, specified and purchased hardware and component storage.

## **Network Administrator**

Interart/Sunrise Publication | Bloomington, IN | May 1995–Aug 1996

- Managed Mac network for design department of the third largest greeting card company in North America.
- Implemented RevRdist file synchronization software for automatic administration of Macs.
- Programmed custom image processing system using AppleScript, Solaris and Helios Universal File Server.

## **Support Engineer**

University Computing Services | Bloomington, IN | Nov 1992–May 1995

- Provided technical support via email and telephone for students, faculty, and staff.
- Wrote technical articles for the UCS Knowledge Base – one of the first Web-based helpdesk systems.
- Performed data recoveries and backups for corrupted thesis files.
- Conducted technical training for various campus systems.
- Diagnosed, repaired and upgraded on-site hardware.

## Education

### **B.A. in Telecommunications, Minor in Biology**

Indiana University | Dec 1993

Coursework included:

- W350 Advanced Expository Writing
- X395 Minds, Brains, and Computers
- S404 Honors Semester in Telecom
- R322 Telephony History & Technology

## Tech Due Diligence Consulting

- **C3.ai** | Sept 2022–Present  
Technical analysis of machine learning system
- **Class pre-certification** | Jan–July 2021  
Technical analysis of mobile apps for video viewing information
- **Class pre-certification** | Jan–July 2021  
Technical analysis of mobile apps for incognito mode
- **Class pre-certification** | Mar 2021  
Technical analysis of mobile apps for pasteboard sharing
- **Expeditors International, Inc** | Sept–Oct 2018  
Source code review of startup for possible acquisition
- **Greenheart International** | Jan 2017–Feb 2017  
Code quality audit of outsourced software project
- **eClinicalWorks/US Department of Health & Human Services** | Nov 2016–Nov 2017  
Safety-related audit of source code for EMR system

## Class Action & Government Litigation Consulting

- **Ashley Popa v. Harriet Carter Gifts Inc et al.** | May 2023–Present  
Jurisdiction: US District Court of Western District of PA  
Case Number: 2:19-cv-00450  
Counsel: Lynch Carpenter
- **Compass Class Action** | May 2023–Present  
Jurisdiction: US District Court, Eastern Missouri  
Case Number: 4:18-cv-01962-SEP  
Counsel: Arias Sanguinetti Wang & Torrijos, LLP

- **Jazmine Harris v. Public Broadcasting Service, Jabari Seller v. Bleacher Report, Inc (Warner Media), Zachary Rohlfis v. WGNTV (Nexstar Media Inc), Jennifer Waller v. Tampa Bay Times (Times Publishing Company), Greg Roland v. The Chive (Chive Media Group, LLC), Melanie Barber v. Eisenhower Medical Center, Inc, Emma Mendoza v. Newsweek Digital, LLC, Emma Mendoza v. WP Company LLC dba The Washington Post** | Apr 2023–Present  
Jurisdictions: U.S. District of Columbia Superior Court  
Case Numbers: 1:22-cv-02456-AT , 3:2023cv00368 , 1:23-cv-01050 , 8:23-cv-00119 , 1:2023cv00337, 1:2023cv00643, 5:23-cv-00250, 2023CAB001101  
Counsel: Edelsberg Law, P.A  
Nature of Suit: Class Action
- **LifeScience Technologies, LLC v. Mercy Health et al.** | March 2023–Present  
Jurisdiction: US District Court, Eastern District of Missouri, Eastern Division  
Case Number: 4-21-cv-1279 SEP  
Counsel: Stinson LLP  
Nature of Suit: Trade Secret, Breach of Contract
- **WESCA / VonBergen v. Liberty Mutual Insurance Company** | Oct 2023–Present  
Jurisdiction: Eastern District of Pennsylvania  
Case Number: 2:22-cv-04880  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action
- **WESCA / Vonbergen v. Bloomingdales.com, LLC** | Oct 2023–Jan 2024  
Jurisdiction: Eastern District of Pennsylvania  
Case Number: 2:22-cv-04724  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action
- **WESCA / Munday v. Avis Budget Group, Inc** | Oct 2023–Jan 2024  
Jurisdiction: Eastern District of Pennsylvania  
Case Number: 2:22-cv-04807  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action
- **WESCA / Farst v. Michaels Stores, Inc** | Oct 2023–Jan 2024  
Jurisdiction: Middle District of Pennsylvania - Harrisburg  
Case Number: 1:22-cv-01433  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action
- **WESCA / Farst v. Autozone, Inc** | Oct 2023–Nov 2023  
Jurisdiction: Middle District of Pennsylvania - Harrisburg  
Case Number: 1:22-cv-01435  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action

- **WESCA / Huber v. Expedia, Inc** | Oct 2023–Present  
Jurisdiction: Eastern District of Pennsylvania  
Case Number: 2:22-cv-03570  
Counsel: Marcus & Zelman LLC  
Nature of Suit: Class Action
- **WESCA / Jamie Huber et al. v. Zillow Group, Inc** | Jan 2023–Mar 2024  
Jurisdiction: US District Court for the Western District of Washington  
Case Number: 2:2022cv01699  
Counsel: Marcus & Zelman  
Nature of Suit: Class Action Privacy
- **Donegani v. Facebook, Inc** | Dec 2022–Present  
Jurisdiction: Ontario, Canada Superior Court of Justice  
Case Number: CV-18-599580-CP  
Counsel: Koskie Minsky  
Nature of Suit: Class Action
- **Laszlo Puszta, et al. v. Apple Inc** | Nov 2022–Present  
Jurisdiction: USDC Northern California  
Case Number: 3:21-cv-7995-JD  
Counsel: Davis Wright Tremaine  
Nature of Suit: Copyright
- **RedVector.com, LLC v. Locality Media, Inc, et al.** | Oct 2022–Present  
Jurisdiction: Hillsborough County 13th Judicial Circuit Courts  
Case Number: 21-CA-001419  
Counsel: Trenam Law  
Nature of Suit: Trade Secret
- **Wissam Al Mana v. Facebook Ireland Limited, et al.** | Oct 2022–Dec 2023  
Jurisdiction: The High Court of Ireland  
Case/Record Number: 2020/1218 P  
Counsel: RDJ, LLP  
Nature of Suit: Privacy, Defamation
- **CG3 Media, LLC and Corey Griffin v. Belleau Technologies, LLC** | Sept 2022–Mar 2023  
Jurisdiction: New York Southern District Court  
Case Number: 1:21-cv-04607  
Counsel: Radulescu, LLP  
Nature of Suit: Patent
- **Stark et al. v. Patreon, Inc** | July 2022–Aug 2022  
Jurisdiction: Federal  
Counsel: Girard Sharp LLP  
Nature of Suit: Video privacy
- **Svoboda v. Amazon.com Inc** | May 2022–Present  
Jurisdiction: State  
Counsel: Keogh Law LTD  
Nature of Suit: Biometric privacy

• **The State of Texas v. Meta Platforms, Inc, F/K/A Facebook, Inc** | Mar 2022–July 2024

Jurisdiction: State of Texas  
Counsel: Keller Lenkner  
Nature of Suit: Biometric

• **Alexander, et al. v. Hall, et al.** | Feb 2022–Present

Jurisdiction: Federal  
Counsel: Oliver Law Group  
Nature of Suit: Civil rights

• **Hoffard v. Cochise County** | Feb 2022–Present

Counsel: Arizona Center for Disability Law  
Nature of Suit: Voting rights  
Jurisdiction: State of Arizona

• **Cleaver v. Cadillac Fairview Corp.** | Nov 2021–Present

Counsel: Charney Lawyers  
Nature of Suit: Biometric privacy  
Jurisdiction: Canada

• **ACCC & Anor v. Meta Inc & Anor** | Oct 2021–Nov 2022

Counsel: Johnson Winter Slattery  
Nature of Suit: Regulatory  
Jurisdiction: Australia

• **Vargas et al. v. Facebook, Inc** | Dec 2019–Present

Jurisdiction: Federal  
Counsel: Mantese Honigman, PC  
Nature of Suit: Class action

• **Olin et al. v. Facebook, Inc** | May 2019–Sept 2022

Jurisdiction: Federal  
Counsel: Bursor & Fisher PA  
Nature of Suit: Data privacy

• **O'Hara v. Facebook, Inc, Cambridge Analytica, LLC, Kogan, Bannon** | May 2018–Present

Jurisdiction: Federal  
Counsel: Coast Law Group LLP  
Nature of Suit: Data privacy

## Private Litigation Consulting (Ongoing)

• **OneTaste Inc v. Ayries Blanck** | Sept 2024–Present

Jurisdiction: Superior Court, Los Angeles County  
Case Number: 22STCV33093  
Counsel: McPherson LLP  
Nature of Suit: Breach-of-Contract

• **GG Insurance Services, Inc v. Myles Johnson, Insurance Group, LLC** | Aug 2024–Present

Jurisdiction: US District Court, District Of Arizona  
Case Number: 2:23-cv-01964  
Counsel: Koley Jesson  
Nature of Suit: Copyright, Trade Secret

- **Marcos & Jorge Luis Rodriguez v. T-Mobile USA, Inc** | June 2024–Present  
Jurisdiction: US District Court, Southern District of California  
Case Number: 3:22-cv-00581  
Counsel: Sharif Faust Lawyers, Ltd.  
Nature of Suit: Cybersecurity, Standard of Care Breach
- **UMG Recordings, Inc v. Frontier Communications Corp. Voltage Holdings, LLC v. Frontier Communications Corp.** | May 2024–Present  
Jurisdiction: US District Court, Southern District of New York  
Case Number: 1:21-cv-5253, 1:21-cv-05708, 1:21-cv-05050|20-22476  
Counsel: Day Pitney LLP  
Nature of Suit: Copyright
- **Kyle Green v. Jacques Webster, Jr. a/k/a Travis Scott** | May 2024–Present  
Jurisdiction: Supreme Court of the State of NY, County of New York  
Case Number: 159628/2017  
Counsel: McPherson LLP  
Nature of Suit: Social Media Analysis, Personal Injury
- **AlmondNet Inc v. Amazon.com Inc** | July 2023–June 2024  
Jurisdiction: Western District of Texas  
Case Number: 6:21-cv-00898-ADA  
Counsel: Russ August & Kabat  
Nature of Suit: Patent
- **Steep Axis, LLC et al v. Gangsta Breakout, LLC et al** | Sept 2022–Present  
Jurisdiction: Federal  
Counsel: Carmel Milazzo & Feil LLP  
Nature of Suit: Breach of contract
- **TCPA Litigator List v. Ringba** | Sept 2022–Present  
Jurisdiction: Federal  
Counsel: GLegal, LLC  
Nature of Suit: Intellectual Property–Trade Secret
- **McCandless Group LLC. v. Coy Collective** | Aug 2022–Present  
Jurisdiction: Federal  
Counsel: Girard Fox Law  
Nature of Suit: Intellectual Property–Trade Secret
- **Cryptocurrency Pre-Litigation Investigation** | Apr 2022–Present  
Jurisdiction: Federal  
Counsel: Todd & Weld LLP  
Nature of Suit: Cryptocurrency/Fraud
- **Frontier v. Charter** | Mar 2022–June 2022  
Jurisdiction: State  
Counsel: Mayer Brown LLP  
Nature of Suit: Pre-litigation
- **D&D Greek Restaurant, Inc v. Great Greek Franchising, LLC** | Jan 2022–Present  
Jurisdiction: Federal  
Counsel: Lewitt Hackman Shapiro Marshall Harlan  
Nature of Suit: Trademark infringement



- **Sean Wilson v. PTT, LLC d/b/a High 5 Games, LLC** | Nov 2021–Present  
Jurisdiction: State  
Counsel: Holland & Hart LLP  
Nature of Suit: Gaming/geolocation
- **Wave Plastic Surgery v. Venus Plastic Surgery** | Dec 2021–Present  
Jurisdiction: State  
Counsel: Commerce Law Group  
Nature of Suit: Social media
- **Wild Bill's Franchising, LLC v. Wild Wild West Tobacco Wholesale** | Oct 2021–Present  
Jurisdiction: Federal  
Counsel: Gordon E. R. Troy, PC  
Nature of Suit: Intellectual Property - Trademark
- **Wykeya Williams, et al. v. First Student, Inc** | Sept 2021–Present  
Jurisdiction: Federal  
Counsel: Landman Corsi Ballaine & Ford P. C.  
Nature of Suit: Social media
- **Liquid Video Technologies, Inc v. Dynamic KanBan, Inc & Josette Russell** | June 2021–Present  
Jurisdiction: State  
Counsel: Cranfill Sumner LLP  
Nature of Suit: Breach-of-contract
- **ReactX LLC v. Google LLC** | Dec 2020–Present  
Jurisdiction: State  
Counsel: Cohen Milstein Sellers & Toll PLLC  
Nature of Suit: Intellectual Property–Trade secret
- **Confidential v. Confidential** | Nov 2020–Present  
Jurisdiction: Australia  
Counsel: Confidential  
Nature of Suit: Criminal Fraud
- **FinancialApps, LLC v. Envestnet, Inc and Yodlee, Inc** | Aug 2020–Present  
Jurisdiction: State  
Counsel: Kasowitz Benson Torres  
Nature of Suit: Intellectual Property–Trade secret
- **Nokia v. Motorola** | Aug 2020–Present  
Jurisdiction: Federal  
Counsel: Sheppard Mullin  
Nature of Suit: Intellectual Property–Patent
- **Los Angeles County Sheriff's Department v. Orrego** | Aug 2020–Present  
Jurisdiction: County  
Counsel: Stone Busailah, LLP  
Nature of Suit: Internal Affairs
- **Tenstreet, LLC v. Driverreach, LLC** | July 2019–Present  
Jurisdiction: Federal  
Counsel: Faegre Baker Daniels LL  
Nature of Suit: Intellectual Property–Trade Secret

- **Calendar Research LLC v. Stubhub, Inc and eBay Inc** | Jan 2019–Present  
Jurisdiction: Federal  
Counsel: Quinn Emanuel Urquhart & Sullivan LLP  
Nature of Suit: Intellectual Property–Copyright
- **Sound View Innovations, LLC v. Hulu, LLC** | Nov 2017–Present  
Jurisdiction: Federal  
Counsel: Desmarais LLP  
Nature of Suit: Intellectual Property - Patent
- **Beard v. Gerdau S.A.** | May 2017–Oct 2022  
Jurisdiction: Federal  
Counsel: Reaud Morgan and Quinn LLP  
Nature of Suit: Breach of Contract
- **Softtech USA d/b/a Gemfind v. Chasin** | Feb 2017–Present  
Jurisdiction: Federal  
Counsel: Robinson & Robinson  
Nature of Suit: Intellectual Property–Trade Secret
- **Hull et al v. Marriott International, Inc** | Mar 2015–Present  
Jurisdiction: Federal  
Counsel: Conn Maciel & Carey PLLC  
Nature of Suit: Software Accessibility/ADA
- **Copart, Inc v. Lightmaker USA, Inc** | Mar 2015–Present  
Jurisdiction: Federal  
Counsel: Porter Scott LLP  
Nature of Suit: Breach of Contract
- **Smarty Had a Party LLC v. Barrett Brothers, Inc** | Jan 2015–Present  
Jurisdiction: Federal  
Counsel: Capes, Sokol, Goodman & Sarachan, P.C.  
Nature of Suit: Trade Name Infringement
- **Hablian, et al. v. Zurich U.S., et al.** | Jan 2015–Present  
Jurisdiction: State  
Counsel: Marlin & Saltzman LLP  
Nature of Suit: Source Code Verification
- **Mass Appeal Media, Inc v. Davina Douthard, Inc** | Oct 2014–Present  
Jurisdiction: Federal  
Counsel: Krakowsky Michel  
Nature of Suit: Intellectual Property - Trademark

## Private Litigation (Concluded)

- **Illinois GIPA Class Action Pre-Litigation** | May 2023–Dec 2023  
Counsel: Custodio & Dubey LLP  
Nature of Suit: Pre-Litigation, Class Action

- **Meta Platforms, Inc v. Almondnet, Inc and Intent IQ, LLC** | Jan 2023–Jan 2024  
Jurisdiction: USPTO Patent Trial and Appeal Board  
Case Number: IPR2022-00773  
Counsel: Russ, August & Kabat  
Nature of Suit: Patent, IPR
- **Crumbi, Inc v. Dirty Dough, LLC** | Sept 2022–Dec 2023  
Jurisdiction: Federal  
Counsel: Berg Law, LLC  
Nature of Suit: Intellectual Property–Trade Secret
- **Famous Birthdays, LLC v. Socialedge, Inc** | Sept 2022–Dec 2022  
Jurisdiction: Federal  
Counsel: Wilson Elser Moskowitz Edelman & Dicker LLP  
Nature of Suit: Intellectual Property - Copyright
- **Michael & Teresa Loew v. Johnson Insurance Group & Acuity** | Sept 2022  
Jurisdiction: Federal  
Counsel: Montero Law  
Nature of Suit: Breach-of-contract
- **Dual Diagnosis Treatment Center, Inc, et al. v. Health Net, Inc, et al.** | Apr 2022–May 2022  
Jurisdiction: State  
Counsel: Kantor & Kantor LLP  
Nature of Suit: Social Media Defamation
- **Kaiser v. Gilliam** | Nov 2021–May 2022  
Jurisdiction: State  
Counsel: Arnold & Porter LLP  
Nature of Suit: Graphic design
- **Muzeit Limited v. Bytedance, Ltd.** | Aug 2021–May 2022  
Jurisdiction: Federal  
Counsel: Knobbe Martens  
Nature of Suit: Intellectual Property–Trademark
- **Los Angeles County Sheriff's Department v. Rodriguez** | June 2019–Dec 2021  
Jurisdiction: State of California  
Counsel: Stone Busailah, LLP  
Nature of Suit: Internal Affairs
- **Hertz Corporation v. Accenture LLP** | July 2019–Dec 2021  
Jurisdiction: Federal  
Counsel: Wiggin Dana LLP  
Nature of Suit: Breach of Contract
- **Kilterly v. SolutionStream, LLC** | Nov 2020–Dec 2021  
Jurisdiction: State  
Counsel: Hopkins & Huebner, PC  
Nature of Suit: Breach-of-contract
- **Kemps v. Stephenson** | Oct 2021  
Jurisdiction: State  
Counsel: The Family Law Office of Sonoma County  
Nature of Suit: Social media

- **Jesus Gonzalez and Vigen Megerdichian v. 4Over, LLC** | Aug 2021–Oct 2021  
Jurisdiction: Federal  
Counsel: Law Offices of Diane B. Sherman  
Nature of Suit: Employment law
- **AdQuadrant v. Nanigans** | May 2021–Aug 2021  
Jurisdiction: State  
Counsel: Jacobsen & McElroy PC  
Nature of Suit: Breach-of-contract
- **Porchlight LLC v. Ventive LLC** | Dec 2020–Feb 2021  
Jurisdiction: State  
Counsel: Mooney Wieland  
Nature of Suit: Breach-of-contract
- **Express Lien, Inc v. Handle, Inc** | Sept 2020–June 2021  
Jurisdiction: State  
Counsel: Bowie Jensen LLP  
Nature of Suit: Intellectual Property–Copyright
- **Oliver Bassil v. Jacques Webster** | Aug 2020–May 2021  
Jurisdiction: State  
Counsel: McPherson LLP  
Nature of Suit: Intellectual Property–Copyright
- **Social Equity Owners & Workers Association, Inc v. City of LA** | June 2020–Aug 2020  
Jurisdiction: State  
Counsel: Ivie, McNeill Wyatt Purcell & Diggs  
Nature of Suit: Regulatory failure
- **Impact Engine, Inc v. Google LLC** | Jan 2020–Aug 2020  
Jurisdiction: Federal  
Counsel: Kirkland & Ellis  
Nature of Suit: Intellectual Property–Patent
- **Robillard v. Opal Labs, Inc** | Jan 2020–Mar 2021  
Jurisdiction: Federal  
Counsel: Angeli Law Group  
Nature of Suit: Intellectual Property–Trade Secret
- **BrandRep Holdings v. Employer Advertising LLC & Business Solutions LLC** | May 2019–Apr 2020  
Jurisdiction: Federal  
Counsel: Benesch, Friedlander, Coplan & Aronoff LLP  
Nature of Suit: Intellectual Property–Trade Secret
- **Shaghal, Ltd. v. Children’s Network LLC d/b/a Sprout** | May 2019–Dec 2019  
Jurisdiction: State  
Counsel: Fox Rothschild LLP  
Nature of Suit: Breach of Contract
- **OnSors LLC v. Sabrina Schueppl dba NuMe, ABV Group, Inc** | May 2019–Sept 2019  
Jurisdiction: State  
Counsel: Ulich Balmuth Fisher LLP  
Nature of Suit: Breach of Contract

- **Coulter Ventures, LLC, d/b/a Rogue Fitness v. Titan Fitness** | Apr 2019–Feb 2020  
Jurisdiction: Federal  
Counsel: Banner & Witcoff, Ltd.  
Nature of Suit: Intellectual Property–Trademark
- **Christopher Hayden d/b/a Cgraydesign v. Eagles Nest Outfitters, Inc** | Mar 2019–Apr 2019  
Jurisdiction: Federal  
Counsel: Ward and Smith P. A.  
Nature of Suit: Intellectual Property–Trade Secret
- **M. A. Mobile Ltd. v. Indian Institute of Technology Kharagpur et al** | Feb 2019–June 2019  
Jurisdiction: Federal  
Counsel: Sanjiv N. Singh  
Nature of Suit: Intellectual Property–Trade Secret
- **Really Big Coloring Books, Inc v. Delta Dental Insurance Company** | Jan 2019–May 2019  
Jurisdiction: Federal  
Counsel: Troutman Sanders LLP  
Nature of Suit: Intellectual Property–Copyright
- **irth Solutions LLC v. Apex Data Solutions d/b/a DigTix** | Dec 2018–Jan 2019  
Jurisdiction: Federal  
Counsel: Boylan Code  
Nature of Suit: Intellectual Property–Trade Secret
- **Cohen v. Ramirez** | Dec 2018–Oct 2019  
Jurisdiction: State  
Counsel: Colman Law Group  
Nature of Suit: Personal Injury
- **Ensource Investments LLC v. Tatham et al** | Nov 2018–Feb 2020  
Jurisdiction: Federal  
Counsel: Panakos Law  
Nature of Suit: Fraud
- **Flying Nurses International LLC v. FlyingNurse.com** | Sept 2018–Dec 2018  
Jurisdiction: Federal  
Counsel: Dale Jensen, PLC  
Nature of Suit: Fraud
- **Cornerstone OnDemand, Inc v. Modular Mining Systems, Inc** | Jan 2018–Mar 2018  
Jurisdiction: Federal  
Counsel: Gordon Rees Scully Mansukhani, LLP  
Nature of Suit: Breach of Contract
- **Liberi v. Taitz** | Dec 2017–Oct 2018  
Jurisdiction: Federal  
Counsel: Schumann Rosenberg  
Nature of Suit: Fraud/Defamation/Embezzlement
- **Peri Domante v. Dish Network, L.L.C.** | Sept 2017–Nov 2017  
Jurisdiction: Federal  
Counsel: Law Office of Michael A. Ziegler, P.L.  
Nature of Suit: Breach of Contract

- **Applied Business Software Inc v. Citadel Servicing Corporation** | Sept 2017–Mar 2019  
Jurisdiction: Federal  
Counsel: Law Office of David Richman  
Nature of Suit: Intellectual Property–Copyright
- **Integrated Dynamic Solutions, Inc N. Gashtili v. VitaVet Labs, Inc** | July 2017–Oct 2017  
Jurisdiction: State  
Counsel: Westlake Legal Services  
Nature of Suit: Breach of Contract
- **Liang v. AWG Remarketing, Inc, Group 3 Auctions, LLC** | June 2017–Sept 2017  
Jurisdiction: Federal  
Counsel: WHGC, P.L.C.  
Nature of Suit: Intellectual Property–Copyright
- **Lexxiom Inc v. Converze Interactive Inc, Lido Labs Llc, et al** | May 2017–Mar 2018  
Jurisdiction: Federal  
Counsel: Foundation Law Group  
Nature of Suit: Intellectual Property–Copyright
- **Turkey v. Ali Cihan** | May 2017–Nov 2017  
Jurisdiction: Republic of Turkey  
Counsel: Akkoç Law Group  
Nature of Suit: Criminal
- **Aquilina v. Wriggelsworth et al.** | Apr 2017–Nov 2017  
Jurisdiction: Federal  
Counsel: Bostic & Associates  
Nature of Suit: Civil Rights
- **Rogue Wave Software Inc v. BTI Systems Inc & Juniper Networks Inc** | Feb 2017–Jan 2018  
Jurisdiction: Federal  
Counsel: Snell & Wilmer LLP  
Nature of Suit: Intellectual Property - Copyright
- **Grindr v. Kunlun** | Feb 2017–June 2017  
Jurisdiction: Federal  
Counsel: Hueston Hennigan LLP  
Nature of Suit: Intellectual Property - Copyright
- **Krubim 26 Intl Inc / Woofers Etc v. Golden Communications, Inc** | Jan 2017–Oct 2018  
Jurisdiction: State (ID BC555618)  
Counsel: Law Offices of P. Paul Aghaballa  
Nature of Suit: Breach of Contract
- **Patel v. Facebook, Inc (State of Illinois/biometric privacy)** | Nov 2016–Jan 2020  
Jurisdiction: State  
Counsel: Robbins Geller Rudman & Dowd, Labaton Sucharow, Edelson  
Nature of Suit: Class action
- **Fox Television Stations, Inc v. FilmOn X, LLC** | Nov 2016–Mar 2017  
Jurisdiction: Federal  
Counsel: Baker Marquart LLP  
Nature of Suit: Intellectual Property - Copyright

• **Securus Technologies, Inc v. Public Communication Services Inc** | Oct 2016–Feb 2018

Jurisdiction: Federal  
Counsel: Grubel Elrod Johansen Hail Shank  
Nature of Suit: Breach of Contract

• **Expo Ed Inc v. Anaca Technologies Ltd.** | Oct 2016–Sept 2017

Jurisdiction: Ontario Superior Court Of Justice, Canada  
Counsel: Norton Rose Fulbright Canada LLP  
Nature of Suit: Breach of Contract

• **Chrome Systems, Inc v. Autodata Solutions, Inc** | June 2016–Dec 2016

Jurisdiction: Federal  
Counsel: Wachtell, Lipton, Rosen & Katz  
Nature of Suit: Breach of Contract

• **Zaghi dba Angel Dental Care v. Salama** | May 2016–Sept 2017

Jurisdiction: State  
Counsel: Jalilvand Law APC  
Nature of Suit: Online Defamation

• **Level One Technologies, Inc v. Penske Truck Leasing Co.** | Apr 2016–Aug 2017

Jurisdiction: Federal  
Counsel: Riezman Berger, P.C.  
Nature of Suit: Intellectual Property–Trade Secrets

• **Core Wireless Licensing S.A.R.L. v. LG Electronics, Inc** | Jan 2015–Sept 2016

Jurisdiction: Federal  
Counsel: Bunsow de Mory Smith & Allison LLP  
Nature of Suit: Intellectual Property - Patent

• **Deal Segments, Inc v. Dream Warrior Group, Inc** | Jan 2016–July 2016

Jurisdiction: State  
Counsel: Law Office of Parag L. Amin  
Nature of Suit: Breach of Contract

• **Alertus Technologies, LLC v. Blake Robertson** | Jan 2016–Oct 2016

Jurisdiction: State  
Counsel: Joseph, Greenwald & Laake, P.A.  
Nature of Suit: Intellectual Property–Trade Secrets

• **Alertus Technologies, LLC v. Callinize, Inc** | Jan 2016–Oct 2016

Jurisdiction: Federal  
Counsel: Bowie & Jensen, LLC  
Nature of Suit: Intellectual Property–Trade Secrets

• **BeUbiq, Inc v. Curtis Consulting Group, Inc** | Dec 2015–May 2016

Jurisdiction: State  
Counsel: Farbstein & Blackman  
Nature of Suit: Breach of Contract

• **Vincent Wellrich v. Dream Warrior Group, Inc** | Dec 2015–Feb 2016

Jurisdiction: State  
Counsel: Wolke & Levine LLP  
Nature of Suit: Breach of Contract

- **ABS, Inc v. FCI, Inc** | Nov 2015–Feb 2016  
Jurisdiction: Federal  
Counsel: Law Office of David Richman  
Nature of Suit: Intellectual Property–Trade Secrets
- **Trichel v. Union Pacific Railroad** | Nov 2015–May 2016  
Jurisdiction: State  
Counsel: VB Attorneys  
Nature of Suit: Digital Forensic Investigation
- **Nicole, Inc v. BLK International and Sanjay Khullar** | Sept 2015–Mar 2016  
Jurisdiction: Federal  
Counsel: Greenberg & Bass LLP  
Nature of Suit: Intellectual Property–Copyright
- **Chipp’d Ltd. v. Crush & Lovely LLC** | July 2015–Sept 2015  
Jurisdiction: State  
Counsel: White and Williams LLP  
Nature of Suit: Breach of Contract
- **Johnson v. Storix, Inc** | June 2015–Jan 2016  
Jurisdiction: Federal  
Counsel: Eastman & McCartney LLP  
Nature of Suit: Intellectual Property–Copyright
- **Learning Technology Partners LLC v. University of the Incarnate Word** | Apr 2015–Mar 2016  
Jurisdiction: Federal  
Counsel: Glynn & Finley, LLP  
Nature of Suit: Breach of Contract
- **Nomadix, Inc v. Hospitality Core Services LLC** | Apr 2015–July 2015  
Jurisdiction: Federal  
Counsel: Mehrman Law Office, PC  
Nature of Suit: *Inter Partes* Review - Patent
- **Arrazate v. H&B Group, Inc, dba Nissan of Bakersfield** | Apr 2015–June 2015  
Jurisdiction: State  
Counsel: Rodriguez Law Firm  
Nature of Suit: Social Media Investigation
- **SecureAuth Corporation v. miniOrange Inc** | Mar 2015–Apr 2015  
Jurisdiction: Federal  
Counsel: Abelman, Frayne & Schwab  
Nature of Suit: Intellectual Property–Copyright
- **Jonathan Demichael v. Peak Franchising, Inc** | Mar 2015–Apr 2015  
Jurisdiction: State  
Counsel: Lee, Hong, Degerman, Kang & Waimey  
Nature of Suit: Product Liability Tort
- **Mad River Community Hospital v. CPSI, Inc** | Jan 2015–Mar 2015  
Jurisdiction: State  
Counsel: Janssen Malloy LLP  
Nature of Suit: Breach of Contract



- **RPX Corporation v. Vantage Point Technology, Inc** | Jan 2015  
Jurisdiction: Federal  
Counsel: Winston & Strawn LLP  
Nature of Suit: *Inter Partes* Review - Patent
- **Tool Circle Inc v. Nulinx International, Inc** | Dec 2014  
Jurisdiction: State  
Counsel: Humphrey + Law  
Nature of Suit: Breach of Fiduciary Duty
- **Verso Paper LLC v. Go2Paper, Inc** | Nov 2014  
Jurisdiction: State  
Counsel: Bass Berry & Sims PLC  
Nature of Suit: Intellectual Property - Patent
- **Next Gear IP LLC v. Capstone BPO and Rajesh Wadhwa** | Sept 2014–Sept 2015  
Jurisdiction: State  
Counsel: Wayne Wisong, Esq.  
Nature of Suit: Breach of Contract
- **Nutri-Vet, LLC v. Dykas Shaver & Nipper, LLP** | Aug 2014–Dec 2014  
Jurisdiction: Federal  
Counsel: Hawley Troxell Ennis & Hawley, LLP  
Nature of Suit: Malpractice
- **Breeze Ventures Management, LLC v. The Evans School, Inc** | Aug 2014–Oct 2014  
Jurisdiction: State  
Counsel: Peretz & Associates  
Nature of Suit: Breach of Contract
- **Golden Best Plumbing, Inc v. Baghdasarian** | July 2014–Sept 2014  
Jurisdiction: State  
Counsel: Dack Marasigan LLP  
Nature of Suit: Trade Name Infringement
- **Hill-Rom Company, Inc v. General Electric Company** | July 2014–Aug 2014  
Jurisdiction: Federal  
Counsel: Schiff Hardin LLP  
Nature of Suit: Intellectual Property - Patent
- **Dealercentric Solutions, Inc v. Market Scan Information Systems, Inc** | June 2014–July 2016  
Jurisdiction: State  
Counsel: Burkhalter Kessler Clement & George LLP  
Nature of Suit: Intellectual Property–Trade Secrets
- **YPP, Inc v. Supermedia LLC** | June 2014  
Jurisdiction: Federal  
Counsel: Kirkland & Ellis LLP  
Nature of Suit: Intellectual Property–Copyright
- **AgJunction LLC v. Agrian Inc, et al.** | May 2014–Feb 2015  
Jurisdiction: Federal  
Counsel: Husch Blackwell LLP  
Nature of Suit: Intellectual Property–Trade Secrets

- **Patent Infringement Action** | Mar 2005–Apr 2005  
Jurisdiction: Federal  
Counsel: Bingham McCutchen LLP  
Nature of Suit: Intellectual Property–Patent

## Patent License Consulting

- **U.S. '235 Patents** | 4 Patents | Registers
- **U.S. '345 Patent** | 1 Patent | Graphics processing and selective visual display systems
- **U.S. '370 Patents** | 4 Patents | Multiplex communications
- **U.S. '273 & '463 Patents** | 2 Patents | Technology: Amusement devices: games
- **U.S. '455 Patents** | 4 Patents | Telecommunications
- **U.S. '705 Patents** | 3 Patents | Data processing: financial, business practice, management, or cost/price determination
- **U.S. '706 Patent** | 1 Patent | Data processing: artificial intelligence
- **U.S. '707 Patents** | 12 Patents | Data processing: database and file management or data structures
- **U.S. '709 Patents** | 5 Patents | Electrical computers and digital processing systems: multicomputer data transferring

## Patent Brokerage Consulting

- **Global Intellectual Strategies** | Mar 2014  
1 Patent | Virtualized computing  
Created claim chart showing infringement by major virtualized computing platform.
- **Quinn Pacific** | Oct 2013  
13 Patents | 2D/3D image processing  
Researched portfolio and documented potential infringement by a Fortune 1000 software company.
- **Red Chalk Group** | May 2013  
85 Patents | Wireless data processing  
Evaluated patent portfolio for licensing opportunities.
- **Prodigy IP May 2013**  
8 Patents | Online video streaming  
Evaluated patent portfolio for licensing opportunities.
- **Prodigy IP Feb 2013**  
2 Patents | Digital video recording  
Prepared pre-sale research for small digital media portfolio. Conducted inventor interviews. Created materials explaining the invention and its potential value in the market.
- **Open Invention Network May 2008**  
1 Patent | Operating systems  
Researched a patent for similarity to my prior art from 1996. Advised on acquisition/licensing of patent.

# Non-IP Consulting

## Software Development Manager

RealTalk LA | Los Angeles, CA | Jan 2007–Apr 2007

- Launched community-news website in Debian/Ubuntu environment.
- Audited Ruby on Rails environment and performed triage on broken development components.
- Integrated Trac defect tracking software with Subversion source code control.
- Installed Capistrano for automated application deployments.
- Wrote unit, functional and integration tests, and provided group instruction for test writing.

## Software Integration Engineer

Koders.com | Santa Monica, CA | Sept 2006–Dec 2006

- Integrated Ruby on Rails web services on VMWare Linux into existing Windows/MSSQL architecture.
- Installed and customized Beast discussion forums and Radiant content-management system.
- Ran httpperf benchmarks and configured application servers using mongrel\_cluster load balancing
- Provided general Ruby on Rails expertise.

## Software Developer

YouMee.com | Los Angeles, CA | Mar 2006–Sept 2006

- Ruby on Rails programming for social chat site YouMee.com
- Developed features from specs, performed unit tests, and promoted code into main development line.
- Fixed bugs and updated bug tickets.

## Entrepreneur-in-Residence

Main Street Partners | Cambridge, MA | Aug 1999–May 2000

- Provided technology advising to investment and patent consulting firm on the MIT campus.
- Received entrepreneur pitches, developed business plans, and performed technology vetting.

## Technical Advisor

Hummer Winblad Venture Partners | San Francisco, CA | June 2001

- Provided technology advising to leading VC firm for potential investment in software testing startup.
- Delivered presentations to partners and associates.

## Build Manager

Informix | Oakland, CA | Apr 2001–May 2001

- Implemented cross-platform build automation systems for C and Java codebases on Unix, NT, and Macintosh.
- Integrated CodeWarrior (Mac) and Microsoft Visual Studio (NT) compiles into Unix make.
- Wrote integration code using Applescript, shell, and perl.
- Reduced package construction from 8-plus hours to less than 1 hour.

## Release Manager

Vodafone | Walnut Creek, CA | Jan 2001–Feb 2001

- Release manager for Vodafone Internet Platform (VIP) project, a web services portal.
- Coordinated development, outsourcers, operations, and QA to design flow of code through the release process.
- Established baselines for development efforts.

- Drove CM requirements, internal standards and conventions.
- Performed training for developers on system usage and architecture.

## **Software Configuration Manager/System Administrator**

Wind River Systems | Alameda, CA | Apr 2000–Dec 2000

- Performed infrastructure planning, purchasing recommendations, and technical support for worldwide rollout of ClearCase/Multisite to 17 international locations.
- Wrote Web-based tools in perl for monitoring sync state of network.
- Performed on-site installation and configuration.
- Conducted staff training and Q&A follow-up.

## **Build Engineer**

CMGi | Andover, MA | Sept 1999–Oct 1999

- Organized development tree using CVS for CMGI business unit.
- Provided technical assistance and mentoring about sound software configuration management practices.
- Initiated transition from legacy shell script-based build system to recursive make.
- Worked with QA to provide testable builds of daily development efforts.
- Documented new procedures for project managers.

## **Software Configuration Manager/System Administrator**

GTE Internetworking | Cambridge, MA | May 1998–Dec 1998

- Administered Unix/NT ClearCase environment for Web-based perl development project.
- Installed ClearCase clients, recommended optimal system configurations, performed client upgrades, and coordinated with lead administrators to ensure a productive environment.
- Established automated build environment and build records archive.
- Performed technical support and training for developers in use of the system.

## **Systems Administrator**

Pencom Systems | Boston, MA | Jan 1998–May 1998

- Provided Unix and Windows desktop support for technical recruitment firm.
- Diagnosed and repaired Solaris, SunOS, SCO printing/web/mail/file access problems.
- Designed and installed new server room layout, specified and purchased hardware and component storage.

## **Systems & Process Auditor**

Simon & Schuster Interactive | Boston, MA | Nov 1997–Dec 1997

- Audited software development system and identified problems in Java development efforts.
- Interviewed staff and vendor technical support, and investigated system architecture.
- Gathered technical metrics on servers, client workstations, and network performance.
- Prepared a final report detailing problems, investigative methodologies, and improvements to staff and management.

## **Software Configuration Manager/System Administrator**

Eaton Corporation | Cleveland, OH & Glasgow, United Kingdom | Aug 1997–Nov 1997

- Implemented ClearCase and Attache rollout on HP-UX for Oracle developers at an international diversified parts manufacturer.
- Studied site requirements, recommended ClearCase configuration and implementation.
- Coordinated with Unix staff to make needed changes to development, QA, and production systems.

- Designed and taught a class about the use of ClearCase and Attache for developers, and presented it in several day-long sessions in Cleveland and Glasgow.

## **Software Configuration Manager/System Administrator**

Shiva Networking | Burlington, MA | Apr 1997–Aug 1997

- Provided ClearCase and Unix support for embedded systems developers at network hardware company.
- Implemented perl scripts for system monitoring.
- Coordinated MultiSite rollout with Edinburgh, Scotland, and Cupertino, California.
- Migrated source code repositories from old hardware to new Ultra Enterprise servers.
- Provided training and mentoring for internal Shiva staff.

## **Software Configuration Manager**

Ascom-Nexion | Acton, MA | Jan 1997–Apr 1997

- Provided ClearCase and SunOS/Solaris support for large telecom hardware manufacturer.
- Wrote shell and perl scripts to monitor ClearCase and nightly backup system.
- Implemented NTP across 300 Unix nodes.
- Configured Web server logging software and analyzed traffic.
- Provided ClearCase mentoring and training for internal staff.

## **Support Engineer**

Atria Software | Lexington, MA | Sept 1996–Dec 1996

- Completed certification in ClearCase, a distributed software configuration management (SCM) and build system.
- Provided telephone and email support for ClearCase customers, often involving elaborate remote debugging.
- Participated in weekly “hot ticket” support sessions to solve difficult customer issues.

## **Network Administrator**

Security Dynamics/RSA | Bedford, MA | Aug 1996

- Co-managed heterogeneous network for a large engineering department.

# **Teaching**

### **• Programming Instructor**

Bay Area Video Coalition | San Francisco, CA | Mar 2003–Apr 2003

Designed and taught an Applescript programming course for an educational technology nonprofit.

### **• Technology Instructor in Continuing Education**

San Francisco State University | San Francisco, CA | Aug 2000–May 2003

Designed and taught technology courses for Information Technology and Multimedia Studies certificate programs:

- Principles of Programming
- Mac OS X
- Programming in AppleScript
- PC Hardware
- Internet Architecture
- Database Design
- Received “Outstanding Instructor Award” for Fall 2001

- **Technology Instructor**

Eaton Corporation | Cleveland, OH & Glasgow, United Kingdom | Aug 1997–Nov 1997

Designed and taught a class about the use of ClearCase and Attache for developers, presented in several day-long sessions.

## Patent Applications

- **Method and Apparatus for Remotely Monitoring a Social Website** | Granted Jan 2, 2018  
U.S. Patent 9,858,341 discloses a method for monitoring the creation of user-generated content on one website, and duplicating that content at a second, remote website. The duplicated content can be used for a variety of purposes such as trend analysis or individualized advertising.
- **Behaviorally-Targeted Ad Serving** | Filed Aug 3, 2006  
Provisional filing for 11/833,018.
- **Bayesian-Guided Metadata Classification** | Filed June 5, 2006  
The invention was a method for using metadata associated with curated content to classify new content. (abandoned provisional)
- **Bookmark Search Engine** | Filed Mar 10, 2000  
The invention was an apparatus and method for compiling Web bookmarks across an audience of users and providing a means to search the bookmarks and their content. (abandoned provisional)

## Professional Associations

- Forensic Expert Witness Association
- IEEE Computer Society
- Application Developers Alliance

## Press

- The Capital Forum (<https://thecapitolforum.com/>)
- Social Equity: Up in Smoke (Episode 2)
- This is LA (KCBS)
- Adult Ed with Jake and Amir
- Samsung Battery Recall (KABC)

## Honors and Awards

- **Outstanding Instructor Award**, Fall 2001  
Awarded each semester for exceptional teaching by a continuing education instructor at San Francisco State University.
- **Phi Eta Sigma National Honor Society**, Fall 1993  
National academic fraternity.

- **USC Dean's List**, Spring 1990  
Awarded for GPA of 3.8 or higher.
- **National Merit Scholarship Semifinalist**, Spring 1988  
Awarded for academic achievement to 16,000 high school students each year out of 1.5 million entrants.

## Technical Expertise

- **Web Technologies**  
HTTP, AJAX, REST, SSL (secure sockets), proxies, Amazon Web Services, cloud computing, PaaS, SaaS, web forensics, content management, client/server computing
- **Programming Languages**  
Ruby, Rails, PHP, perl, python, Java, JavaScript, HTML, XML, Shell
- **Operating Systems**  
Linux, Unix, Mac OS X, iOS, Windows, file systems
- **Databases**  
MySQL, mSQL, Sqlite, Memcached, Cassandra, MongoDB
- **Development and Version Control**  
Git, Mercurial, Github, Bitbucket, JIRA, ClearCase, Subversion, CVS, RCS, make, gmake
- **Other**  
Agile development standards and practices, academic plagiarism analysis using MOSS (Measure of Software Similarity), natural language processing (NLP), machine learning, authentication/authorization, encryption, mobile development, performance tuning, scalability, network performance

**EXHIBIT B: COMPARISON OF FILE “JOURNALS” VERSIONS MAY 4 2022 9:44 AM & MARCH 9 2023 7:23 AM**

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Journals May 4 2022 944 AM & Journals March 9 2023 723 AM Text Compare Report  
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Right file: /Users/quandary/Library/CloudStorage/GoogleDrive-jason@quandarypeak.com/Shared drives/OneTaste v Blanck/report/Journals March 9, 2023, 723 AM linebreaks.txt

<p>1 This is my pattern. As the sensation and feeling of out of control builds due to imminent transition, as the feeling of accomplishment builds with it I shut it out. I don't feel the sensations of accomplishment, that I have reached a milestone in my</p> <p>2</p> <p>3 life I have been working for. I do not allow myself to feel because if I do I could also feel the crushing defeat and I believe I do</p> <p>4 not deserve anything I work for, and I never do enough. If I feel the sensation of accomplishment it means I am nearing and end</p> <p>5 and transition is near. I am about to lose control and everything will be thrown into disequilibrium. My association is that a lack</p> <p>6 of homeostasis is dangerous and I will get hurt.</p>	<>	<p>1 Series One: Darkness</p> <p>2</p> <p>3 January 15th</p> <p>4 I officially left on January first 2015. It feels surreal and impossible that after almost three years</p> <p>5 of insanity it's now over. A gray numbness that has swallowed me. My hands still shake as I</p> <p>6 type and I am only able to eat a small amounts of soup without becoming sick. Paranoia lurks</p> <p>7 around me. Fearing at any moment somebody will pop out from behind me to drag me back.</p> <p>8 The logical part of me knows this is not possible, but if I have learned anything it's that we are</p> <p>9 not logical creatures. I do not know the extent to which they broke me but I am afraid of what I</p> <p>10 will find over the coming months.</p> <p>11</p> <p>12 I left New York. I was so scared that if anyone found out before I was on the plane they would</p> <p>13 find another way to pull me back and entrap me. I can no longer be there though, nor see my</p> <p>14 experience through the rose colored glasses. One day soon I imagine I will be able to access</p> <p>15 my rage but right now I am only numb.</p> <p>16</p> <p>17 I have returned to Washington state to my childhood home in eastern Washington with my</p> <p>18 godmother. She lives in a remote part of the state surrounded by wilderness. There is no</p> <p>19 internet connection or cell phone service. Her address is not known by anybody and the only</p> <p>20 person who I told where I was going was my sisters and father. Here, for the first time in a long</p> <p>21 time, I feel safe. Nobody can get me here. Nobody will be able to find me and trap me. He will</p>
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			22	not be able to find nor harm me. Finally, I am free.
7		=	23	
		<>	24	It is nice to just have silence. My own bed. My own shower. No more sleeping on the floor, no
			25	more intrusion or sleeping with random people. No more being touched when I do not want to
			26	be touched. I would never have guessed having my own bed would be such a luxury. A door
8	I did this when I moved from my hometown eureka to whitefish at the end of freshman year. I began working a full time job and		27	with a lock on it. Boundaries where nobody can enter if I do not want them to. I relish hearing
			28	the satisfying click and knowing that nobody can get me. I am safe.
			29	
			30	
			31	I am working to share my experience. To bring it from the darkness into the light. I carry so
			32	much shame, so much hurt. I will be sharing these journals with my sister and others in hope of
9	taking extra classes at the community college, and did homework at lunch because I "had no time". I partied and drank,		33	finding that I am able to be loved again, even for all my mistakes, but also that I might find
			34	reality again. So much happened in such a short amount of time. So much insanity that it almost
			35	feels like too much to process. Like I sit outside looking at somebody else's life. Like a movie
			36	reel the insanity plays over and over in front of my eyes in one endless loop of pain.
			37	
			38	
			39	
			40	
			41	
			42	
			43	
			44	
			45	January 16th
10	snowboarded by myself and told myself that I didn't need anybody to be happy, this was my time to grow myself. I then became		46	I sat staring out the window today. The snow falls in large soft clumps. Everything is quiet. I
			47	have not had this level of quiet for a very long time. The stillness. I still can't feel my body. I feel
			48	outside, like I am looking in. The pain is there. It is always there. The tensions in my joints, the
			49	popping of my jaw, the pain in my gut, and the pain that I cannot physically pinpoint. It
			50	permeates every aspect of me. It feels like my soul has been ripped apart. Shattered into a

11 deathly sick with mono that lasted 8 months my sophomore year of high school. I cut off my best friend of 17 years and did all

12 sorts of things to ruin our relationship.

13

14 When leaving for naropa I basically just packed all my stuff up and left. I did not tell my parents or family what college I was

51 thousand shards of glass. As I sit here I look down at the shards, scattered around my feet in a

52 dark room. Thousands and thousands of them. My reflection broke and jagged, staring back at

53 me. I know that if I ever want to be whole again I will need to pick up those pieces and put them

54 back together. It is not a single crack though, or even a few pieces. Shattered is the only way I

55 can describe it. Like my very being has broken apart and I stand here an empty shell looking

56 around wondering who am I, what am I, and what is real.

57

58 That is the part that is difficult to comprehend and I know others struggle with understanding

59 when I describe it. I feel like I have no idea what is real versus what is not. My grasp on reality

60 feels tenuous at best. I fear too that if I never figure out how to trust what is real and what is not

61 that I will forever be lost in this void of darkness and confusion.

=

<>

62

63 January 17th

64 Today I have started an exercise and eating protocol to help with the sickness. I do not know

65 what is wrong with me but I imagine it's a response to the trauma, stress, and over working. My

66 body started to shut down my last few months there. Eating anything always resulted in

67 vomiting, I was not sleeping well and I was sleeping on the floor of the apartment in the living

68 room because I was not allowed a bedroom anymore. I was extra, a cast off.

69

70

71 The night terrors had started, my hands and body shook, I was always cold and tired. So

72 unbearably tired. I started to lose the feeling in my finger tips. And I cried. I cried almost every

73 day I was in New York city. I was told I was a crazy erratic. Emotional. I realized I was being

74 subjected to intensive emotional, psychological, and physical abuse. I am not surprised I cried

75 every day and that my body began to shut down.

76

15 going to, when I was leaving, or how I was getting there. I worked 80 hour weeks the summer before I left for college. The last

16 week before we moved kyrie and I fought continually, so much we didn't have time to hang out with any of our friends or say

77 Every morning I count my ribs as I get dressed. I weigh myself religiously hoping I have gained weight. I left weighing 98lbs. As I stand in front of the full length mirror I barely recognize the

79 woman I have become. My hollowed out cheeks, deep circles under my eyes. My bony ribs stick out even when I don't lift my arms above my head. The smile that at one time reached my eyes is no longer there. The innocence and young girl filled with sparkle and magic is no longer there. Only deadness. Flat and endless. At times I feel the wasting in my body is only a reflection of the disintegration of my will to live.

84  
85  
86 January 18th  
87 My psyche is breaking. I have no other way of describing it. It comes in waves. Something triggers a memory or a moment my vision begins to swim and it feels like my mind is being pulled apart. Giant hands have grabbed each side of my mind and are tearing it in opposite directions. My vision blurs with multi colors and pain. Is this what it feels like as your mind fractures? Is this what the edge of sanity feels like? I often put my hands on each side of my head, attempting to hold my breaking mind together. But it is in vain. There is a deep fear that at any moment it will finally snap. This splitting is a constant companion. I was reading the Book Cult Recovery and this is the process of deprogramming. Programming, or brainwashing, in a cult is designed to break down the ego, the sense of individual self and identity and then rebuild it within the image and ideas that the group desires. Through fear, pain, lack of sleep, transcendental experiences, psychological torture, and most often shame they break apart your sense of reality so you can no longer trust who you are or what you feel and begin to believe what they tell you. As you deprogram your authentic self begins to resurface and it almost

17 goodbye. I did not go to any of the going away parties, I did not keep in contact with anybody. As we drove away I did not look

18 back once. My body was numb as we drove. Once I arrived at naropa I began working a 25 hour week within seven days and I

19 signed up for 18 credits and 2 different volunteer positions. I did not go back home on breaks or the summer until my last year of

100 "battles' ' with the programming creating this sense of splitting and breaking.  
101  
102 I believe this is the most terrifying thing a human can ever experience- the loss of their identity. I  
103 am falling constantly through a void. Grasping for a piece of who I am, who I should be, how I  
104 should act, what is right and true in this world and what is not. I do not believe many people  
105 experience what it means to lose your sense of identity. Or in my case to have it shattered. Our  
106 ego - identity- soul whatever you want to call it is a constant companion from the moment we  
107 are bornt. It is like breathing air. It is always there and you only notice its existence, in a very  
108 painful way, when it is ripped away from you. Without reality your ability to to tell what is real or  
109 not real, what is happening or not happening your human psyche begins to lose meaning for  
110 existing, it begins to question the purpose of staying alive. If life has no solid sustenance, if we  
111 cannot tell what is real or not real then experiences, emotions, everything becomes void of  
112 meaning and importance. You have no idea if you're actually living or not, If these things are  
113 actually happening. The only solace I find is reading the Cult Recovery book and talking to a  
114 therapist as they say is what happens as you are recovering.  
115  
116 It is a painful and disorienting process. The battling of your authentic self over the  
117 inauthentic self that was formed. The inauthentic self is held in place by a web of our own weaving  
118 directed by those higher up in the organization to keep us entrapped and ensnared. It is an invisible  
119 cage that keeps us bound.I believe psychological restraints are stronger than any physical bonds,  
120 because at least with physical bonds you continue to hold the hope of oneday escaping with

			121	psychological ones your remembrance of what it means to be free slowly slips away until you no longer realize what it was like before. The bonds become your new reality, caging you in.
			122	psychological bonds destroy hope, and hope is what we need to continue to survive.
			123	
			124	
			125	
			126	
			127	January 19th
			128	The memories are stronger now. I can't escape them during the day. I go through waves of
			129	horror, grief, rage, fear. I am slowly unpacking all the places that hurt, where I was gaslighted, and am rewriting in my mind and this journal what was actually happening.
			130	
			131	
			132	
			133	Today a particularly potent memory is the time at the house on the lower east side we were running a coaching circle. I was working back of the house helping out with the event. A community member who was known to be particularly odd and if I look back now unhinged, was there that night. The topic of the "beast" within us all had been something that was being talked about and explored recently. The beast, as Nicole calls it, is your shadow. The taboo part of you that you deny and believe is bad. She teaches that 1. The most loving part of you is your beast as it's your most primal authentic being 2. It has been caged, denied, and betrayed by you and is very angry 3. Only by letting your beast out can bringing the darkness to the light of day can it heal.
20	school.		141	
21		=	142	
22	Now I want to feel my accomplishments and feel what it feels like to let the universe take control	<>	143	This all sounds wonderful and borrows heavily from psychology and buddhism. The actuality at onetaste is that letting out of the "beast" becomes an excuse to ignore or condone violence and abuse.
			144	
			145	
23		=	146	
24	My accomplishments	<>	147	This evening this community member let his beast out, and through that process he walked over to me, being a 6 foot 200+ pound man he picked me up, my arms pinned to my sides, and
25	I moved out when I was 16 and supported myself		148	

26 I worked 1-2 jobs throughout high school 30+hours a week.

27 I placed in four different snowboard competitions first and second place

28 I dropped and skied backcountry when I was 17

29 I made varsity softball my freshman year

30 I made JV volleyball ball my freshman and sophomore year

31 I danced ballet at the head of the company when I was 16

32 I graduated with merit distinction and took 8 ap classes

149 began to shake me in front of everyone. Nobody did anything. I sat there being shook like a rag doll as he screamed at me how he would like to rape me, beat me, use me, that he knew where

150  
151 I slept and he would find me in the night. Eventually he put me down and we finished the circle.

152 Afterwards many of the women in the circle who were community members expressed their fear

153 and trepidation at his display. I was reprimanded afterwards by Maya for "showing fear in the

154 face of his beast' and that a true turned on woman would have taken his beast's cry for help

155 with grace and love. That is true alchemy.

156  
157 I look back on it now and I am not surprised I was unable to sleep anymore. That I left my body

158 to survive. It is this kind of blending of a note of truth (needing to look at a shadow to help it

159 heal) with shame and abuse that creates the slippery slope that you slide down until one day

160 you wake up and you have no idea where you are or how you got there.

161  
162  
163

164 January 20th

165 I woke up today filled with rage. Rage at what Ravi did to me and how Rachel made his violence

166 my fault. How could I have stayed with him after the first time he hit me? It has taken a full

167 month for me to face these memories and I am not sure I will ever overcome the shame and

168 betrayal.

169  
170 That feeling of shame and guilt. How small I became inside. I do not remember what we fought

171 about or why he hit me but he did. He punched me in the face and split my lip and bruised my

172 eye. At first I was shocked. We had fought many times before but I had never thought he would

173 go that far. I went over to the Morellino to talk with Rachel about this, as in my experience an

174 organization that supports women would not support violence against women. I found little

33 I graduated high school with 27 college credits from the community college

34 I bought my first car at 16  
35 I completed hundreds of hours of volunteer work before I graduated high school

36 I survived emotional and physical abuse

175 sympathy. I watched Rachel in a daze through half shut eyes, my cheeks burning with shame.  
176 This, I was told, was my fault. I had forced him to do it. His "beast" was only fulfilling what my  
177 "body" had asked him to do. Since I was a survivor of childhood domestic violence this was my  
178 pattern and what my body was asking for. HE was only doing as my body asked and now I was  
179 shaming and blaming him for doing what I had asked for. I had made him do it.

180  
181 As she finished I looked around the room. All eyes were downcast. Nobody was willing to stand

182 for me. I never spoke again about the other times he hit me or drugged me around. Looking  
183 back now I can't believe I stuck through it. I so wanted to believe he would change. I was told he  
184 was part of my soul's journey, that it was my karma to be working through this stuff together.  
185 That sometimes our soulmates must do violent things to help us grow. They are our greatest  
186 teachers. It was only a way to condone violence. They did not want me to 1. Go to the  
187 authorities 2. Have Ravi leave and take his money with him.

188  
189  
190 Onetaste makes itself out to be a haven for women when it is the same oppressive and abusive  
191 environment using sex and finacial chockholds to control and use womens bodies and sexuality  
192 for personal gain. This time with a modern, young, chic exterior. Labeling itself not as  
193 prostitution, mysogony, or patraiarchy but as personal growth and healing.

194  
195 I remember rachel hemsı telling me everyone has something to offer to the orgasm (god) I had  
196 energy and my feminine (body, sex what ever you want to call it) and others had money (a form  
197 of energy). We gave our bodies and they gave their money and it was all energy to further  
198 orgasms (god's) purpose.

199



#: 4241

200 It sounds ridiculous when I look  
back on it. But we are not logical  
creatures. We love to rely on  
201 our intellect. We believe we think  
things through with impassiveness  
and intelligence when in  
202 reality our minds are soft and  
malleable. We cling to this idea  
that we have control. That people  
203 who are abused, manipulated are  
somehow dumb or lesser. That they  
should have seen it  
204 coming. What I see now is those  
people, who believe that this would  
never happen to them, are  
205 only grasping for control. Clinging  
to this idea that they would never  
allow this to happen.

206  
207 They would.

208  
209 Human persuasion, brainwashing,  
mind control, NLP, whatever you  
want to call it is a heavily  
210 studied and perfected art. It is  
easier to do it to those who suffer  
from trauma, abuse, or are very  
211 broken than those who are not but  
what I now see is that anyone, in  
the right environment with  
212 the right amount of pressure,  
shame, fear, and other tactics  
would be caught by it.

213  
214 We are afraid of how delicate and  
impressionable our psyche is and it  
is easier to blame the  
215 victim than it is to admit that we  
are afraid. It takes very little to  
take the human mind and  
216 impress upon it what is desired of  
it.

217  
218  
219 January 20th  
220 The darkness consumes me today. I  
can't say much because all I want  
to do is sleep and fall  
221 into oblivion. I do not want to go  
on sleeping pills or medication but  
I am not sure I can go on  
222 much longer.

223  
224  
225 January 21st  
226 It is 5am. Joyce has gone to bed.  
She found me in the living room  
screaming into a pillow in  
227 front of the fire. I have never  
been that far gone before. The pain  
and memories plague me  
228 every waking hour. I cannot escape  
them, the nightmares torment me in  
sleep leaving me

37 I supported my sister in finding her  
freedom

38 I was employee of the month two months in a row

229 exhausted and sleep deprived. I  
feel like I am going nowhere. That  
I will never get better. Death  
230 seems more pleasing than the  
thought of living the rest of my  
life in this suffering. What if I  
can  
231 never find my grasp on reality.  
What if I live the rest of my life  
without knowing who I am.  
232 Disconnected to my sense of self  
and my soul. What if I can never  
escape the torment of all the  
233 memories, the assault, the touches,  
the creepy leers, the feeling of  
being used and dirty. My  
234 skin crawls like it is filled with  
ants. The memories pull me under  
into places of fogged and  
235 lifeless darkness where all I know  
is pain and memories of confusion  
and hurt.  
236  
237 Is life worth living if it's only  
torment? I don't think so. I have  
never been this close to taking my  
238 own life but I am not sure I can  
take much more of this. I am in  
darkness and there is no light,  
no way out.  
239  
240  
241

242 January 22nd  
243 Today I am feeling better. My best  
friend from highschool came and  
visited and it feels so good  
244 to connect to people from before  
all the insanity. I missed her. I  
feel a little less lonely and I do  
not feel so hopeless..  
245

39 I was able to cocktail serve and work banquets at 17-18 yrs

246  
247 I landed back in my body. It was a  
crazy experience and very surreal.  
I was laying down and as  
248 I woke up it was like I was in one  
of those movies, where it is filmed  
through the eyes of the  
249 character and you see what they see  
as they look around.

250  
251 I began to push myself up from the  
bed and my body felt heavy, heavier  
than it has felt in a  
252 very long time. I thought this was  
strange. My body feels so much more  
solid. I laid back down.  
253 As I laid there I realized I had  
been dissociated from my body.  
Completely living outside of it. I  
254 know from naropa that it is a  
trauma response. As I laid there I  
began to feel the tightness of the  
255 muscles in my back, the weight in  
my fingers as they reached for  
something, my stomach felt

256 solid, and whole in my body again.

257

258 The last six months there I was  
the "deepest" within the practice  
and the community I had ever  
259 been. I had been coming 3-4 times a  
day, sometimes more and "getting  
into my body" through

260 this practice and yet I am  
dissociated, disconnected, and to  
be touched or connected to another  
terrifies me.

261

262  
263 In Cult Recovery it talks about how  
there are three things that get  
influenced by three forms of

264 human perception; Mind-Body-  
Emotions. And wherever one goes the  
other two will follow and

265 regulate the rest of the system so  
that there isn't too much of a  
psychic split for the person and

266 they can regain their grasp on  
reality. We process our reality  
through our senses and when what

267 "our senses" and what "our mind" is  
telling us do not match then  
dissonance is created. At least

268 this is how I understand it.  
269

270 While there you are living in a  
constant state of dissonance and  
division in your waking

271 experience. Your body is telling  
you it is unhappy, that it is in  
pain, that you're suffering, your

272 emotions are erratic, but your mind  
is telling you that is the way it  
is supposed to be that this is

273 correct that what your body is  
feeling and telling you is wrong.  
Your mind is parroting what the

274 staff tell you, what the teachings  
tell you. It helps to justify the  
suffering and pain. The

275 disconnection becomes so strong  
that either your psyche will break  
because it cannot reconcile

276 the difference or they will sync up  
and you create forms of denial or  
suppress feelings or

277 emotions to survive.  
278

279 It is amazing how a practice and  
community designed to "get you back  
into your body" in the

280 end only alienates you from your  
body more and uses this  
disconnection to control and

281 manipulate you.  
282

283 Eventually you leave your body.  
Because the trauma and pain is too  
great and for survival's  
284 sake you must.

		285	
		286	
		287	January 23
		288	Besides the physical pain, grief is
			my constant companion. At times I
		289	am angry with myself for
			how much I miss everyone. How much
		290	I miss being part of a community. I
			am angry that I even
		291	have grief. Part of me wants to
			stay in the rage. To live in it and
		292	let it protect me from the
			desolation below. The expansive,
		293	numbing embrace of grief. At least
		294	in rage I can feel, I can
		295	continue to fight. Within grief all
			I can do is feel and relive.
		296	
		297	It continues to snow. A white
		298	world of silence and softness. I
			spend a lot of time staring out of
		299	the window as I sit next to the
		300	fire. I swim through my grief and
			reread over and over again the
		301	poem Pain by Kahlil Gibran.
		302	
		303	Your pain is the breaking of the
			shell that encloses your
		304	understanding.
		305	
		306	Even as the stone of the fruit
			must break, that its heart may
		307	stand in the sun, so must you know
		308	pain.
		309	
		310	And could you keep your heart in
		311	wonder at the daily miracles of
		312	your life your pain would not
		313	seem less wondrous than your joy;
40	I kept the same job for four years	314	
41		315	
		316	And you would accept the seasons of
		317	your heart, even as you have always
			accepted the
		318	seasons that pass over your fields.
		319	
		320	And you would watch with serenity
		321	through the winters of your grief.
		322	
		323	I cling to these words, much of my
		324	grief feeling like a desolate field
		325	in winter. Blown over by
		326	snow, cold and unliving. I cling to
		327	hope though. If I ride it out, if I
		328	feel and process my grief, once
		329	again spring and life will come
		330	back to me.
		331	
		332	I sit here, trying to keep the
		333	horrifying memories, the trauma, at
		334	bay. The memories plague me
		335	day in and day out. I cannot be
		336	awake without reliving one of the
		337	moments of pain, suffering,
42	I graduated college in three years		
43	I graduated with two BA's		
44	● I obtained my permaculture certification		
45	● Jason, out of all the students he has taught asked me to work for him and to run the greenhouse		

46 ● I got chosen to be the student sustainability coordinator

47 ● I wrote two thesis, one sixty pages

48 ● I was able to be vulnerable enough with a man to open my sexuality and love

49 ● I completed a three semester long wilderness guide training

50 ● I took 18 credits every semester except my last I worked 20+ hours every semester except my last

51 ● I was awarded as a student leader two years in a row

52 ● I received the peace studies department scholarship

53 ● I helped usher in some of the most monumental sustainability stuff that has happened at naropa university

54 ● I paid for a 60,000 dollar education all by myself through scholarships, grants, and only borrowing 3,000 dollars from

318 and hurt from the last 3 years. I remind myself to not think but just let my body feel. To find, if not joy, solace in the fact that I can still feel. That I am here and alive and human. And if I can feel, then I can heal and maybe one day I will be able to find my way out of this darkness.

321  
322  
323 24th  
324 It is the same every night. I don't sleep anymore out of fear of being taken to that place. That  
325 horrifying nightmare where I am ripped apart and left alone. The dream is the same every time and no matter what I do it is my constant companion.

327  
328 It starts with me standing in a group with Maya, Hamza, Brooke, Rafael and Po. There is a  
329 building behind us. A large gray concrete building with a small hole in the side about 2 feet wide and 3 feet tall. Just tall enough for somebody to crawl through. They all convince me to enter the building through the hole. I look into it and see nothing. It is a black bottomless void  
332 with no light. I am afraid but they say they will come after me. They remind me we are family, we  
333 are always there for eachother. I brace myself on each side, my hands just holding me back  
334 from the all consuming darkness. I look behind me one last time and they stand in a semicircle  
335 around me. I give them a small smile and they nod their heads. As I step in I feel the first cold fingers wrap around my ankles, around my arm. I try to stop my forward motion but their fingers  
337 have begun to wrap and pull me in. Cold and sharp they begin to shred my flesh. I scream. I  
338 scream for somebody to help me. I am pulled through and fall down. I pull my body up and crawl  
339 towards the entrance where I see the light. I see Hamza and begin to scream his name,  
340 screaming and screaming for somebody to help pull me out. I reach my hand forward grasping  
341 for help. The creatures continue to tear at my flesh, consuming me. My

#: 4246

55 my parents

56 ● I omed with my partner in public after only dating him for three weeks

57 ● I dated a woman

342 friends, my family look  
at me. A blank expression on their  
faces. I continue to scream their  
names and I reach my hand  
343 for them. Nobody grabs it. They  
stand there staring at me. Their  
expressions are blank and  
344 unfeeling. Slowly they turn away  
from me. They dont leave, just turn  
around a few feet from  
345 where I am being torn apart. Their  
backs to my outstretched arm.  
346  
347 I scream his name one more time, he  
looks over his shoulder at me.  
Emotionless and void and  
348 turns around.  
349  
350 It's like I never mattered.  
351  
352 I realize I am utterly alone.  
Nobody is going to help me. The  
promises, the love, the community,  
353 the family it was all a lie. I am  
alone.  
354  
355 The writhing creatures their claws  
take hold and they pull me under  
and I wake up screaming.  
356 Joyce holds me. Rocking me. I know  
if I fall asleep I will be sucked  
back into that place.  
357  
358 This same nightmare is my constant  
companion. Over and over again I  
relive their betrayal.  
359 How they threw me under the bus  
when Ravi hit me. When I was dumped  
on the streets on  
360 New York like trash. How they  
turned their backs when it was no  
longer convenient for them to  
protect or care about.  
361  
362  
363 This is one of the most horrifying  
and traumatic things they make you  
do. Over and over again  
364 they make you abandon them for your  
own self preservation. Go against  
your sense of integrity  
365 and what is right because you are  
too afraid that the punishment will  
be turned to you so as  
366 atrocities happen you don't say  
anything. You begin to believe that  
it is for their own good. That  
367 it's a form of tough love- that  
awakening is hard and people need  
to face their demons and that  
368 only through doing these things  
that the upper staff and Rachel  
tell you to do will you help free  
369 them.  
370

58 ● I helped make a documentary that supported indigenous peoples

59 ● I omed with multiple men, some I do not know

60 ● I followed desire and attraction for another man when in my partnership

61 ● I found my physical strength and body

62 ● I created a yoga practice I do everyday

63 ● I trained my dog well

64 ● I allowed myself to love a man

65 ● I allowed a love to die

371 If you're not willing to do it you are a coward and selfish. Only caring about yourself unwilling to do the things necessary to help those you care about find freedom. It all seems so fucked up now. Looking back, the subtle levels of eastern philosophy, matrix references, and psychological manipulation slowly pulls you under where you become riddled with shame and hurt. You are constantly forced to hurt those you care about in the "name of orgasm and god".

376  
377 Rachel once said something very telling - Life is suffering (using the buddhist concept of suffering) and if you're going to suffer you might as well suffer for a purpose versus suffer for the sake of suffering. If you look at this from afar it seems to make sense. When you dig in you realize the subtlety of brainwashing. That they equate growth and transformation with suffering.  
381 I would go so far to even say they equated freedom with suffering. And the more you suffer the greater the obstacle you're overcoming to your path to freedom. In this way they condition you to accept and take the punishment because that is how it is supposed to do and the "muggles" take the easy route by never subjecting themselves to any form of pain.

385  
386  
387  
388  
389  
390 January 25th  
391 I am visiting my sister who lives a few hours away from my godmother. She has been a steadfast support for me. I am not sure I would be here if it wasn't for her. We talk everyday and she knows most everything that has happened as she was there through this entire thing with

394 me and visited new york.

395  
396 For the first time I told somebody my entire story. I realize I have kept so many things hidden all

66 ● I worked hard to stay connected in an open long distance relationship

397 these years. Trying to play down the crazy. The insanity and abuse from Ravi. We went out to eat and found a quiet spot and I started at the beginning. It is freeing to have it all out there. To

67 ● I allowed myself to receive love from a man

398  
399 have somebody else see me, in all my mistakes and brokenness and still love me. To

68 ● I was able to balance my school schedule and traveling all semester

400 understand why I did so many unkind things to her and my older sister these last few years, why I was so far gone, and how I almost died.

69 ● I have a 3.8 GPA

70 ● I found common ground with my sisters and worked to build a connected, loving relationships

71 ● I followed my desire for a woman

72 ● I got invited to players group in Tgroup

401  
402  
403  
404 I tell the story of what happened. I hear the crazy within my own words. Nothing I say makes sense within the real world. The jargon, the alternative beliefs, the questionable morals, the forceful tactics for "growth" all of it when spoken out loud sounds like lunacy. When there you are instructed to not talk to "muggles" about your experience because they will not understand and will judge you or think you are crazy. I realize now that this is because when you start talking to outside people you sound like you are crazy and what is happening to you is insane and traumatic and any normal person would call the authorities if they know what was happening.

73 ● I successfully organized 10+ large events over the last three years at naropa

74 ●  
75 ● I have accomplished a lot, I deserve to feel successful and powerful. I am successful and powerful. I have a lot to give.

411  
412  
413 It is why we keep ourselves separated from "normal" people. It is why they push you to detach from your family, live together all in one place, to disconnect from your old friends and community. It's how they isolate you and create a feedback loop because there is nobody from the outside looking in. All those with the answer on why something is happening are those with

76 The universe wants to use me, I want to be used by the universe. I am resilient and strong I can face whatever arises. I can always persevere and I know my truth. It has never lied to me, and in the darkest times it has always guided me. my

78 accomplishments show me how powerful I am. I deserve to feel my success. I graduate in a week.

417 authority, those who have been steeped in orgasm and of course they always believe the outside world is trying to get you, to pull you back into the matrix, to make you "fall asleep again.'

79 ●

419  
420



80 ● I am entering a new stage of my life. it is a HUGE transition. I am releasing control, because I actually cannot control  
81 any thing except to notice the way I react and approve of who I am. I do not have control. And that is huge and scary. I

82 could fail, I could fall. And when I have done that in the past I have picked myself back up and continued to move

83 forward. Now is no different.

84 ●

85 ● I have been playing a game of create disturbance and chaos in my relationship so I do not have to feel the intensity of

86 my success and the fear of transition. If ravi and I fight all way the up to the day he gets here then I do not have to

421 I see now how poisonous this kind of belief is for those who have grown up let down by society and authority. It is easy to believe that the world outside is wrong, that everything you were told  
422 was a lie. Especially if you have lived most of your life disappointed or abused by those in authority. Everyone I can remember came with some form of trauma or story of suffering.  
423 Childhood trauma in the form of physical violence or molestation, partner violence, substance  
424 addiction and on the edge of recovery, a parent or a child of theirs had died in a horrific or  
425 unexpected way, medical conditions that were incurable and that modern medicine said were  
426 not real. We often bonded around the fact that we were outsiders, rebels, and people the world just didn't understand. But I now see where we were more bonded by our traumas than  
427 anything.  
428 They took broken and hurting people and used our pain and vulnerability to their advantage.  
429 They used our fear to control them, our lack of familial support, our paranoia and armed  
430 themselves with it to take already vulnerable people and break them.  
431  
432 Cults prey on those who are already downtrodden using their brokenness to mold and use them  
433 for their own gain.  
434  
435  
436  
437  
438  
439  
440  
441 January 27th  
442 They played us like a chessboard. I see it now, as plain as day. The reading of text messages, made us divulge secrets and fears in the name of "vulnerability" reading of fear inventory to staff  
443 all of it was a way to gather information and play us how they wanted. All of it was a way to make them seem all knowing and that they truly got you and understood you. They took your  
444 fears, your deepest darkest shame and used them to scare you into doing what they wanted.  
445  
446

87 think about or feel my shit around transition or how successful I am. When we fight I do not have to allowing myself to

88 receive or feel his pride or joy for me, and I can again believe I am alone and he does not care about me, which feeds

89 the cycle of fighting. The things we are talking about are not immediate, the world will not end whenever we fight, the

90 tension is ok, I approve of where I am at. Ravi is proud of me and does care about me. What I am going though is huge,

91 others and ravi cannot approve of my success and joy if I do not approve of it and think I deserve it. I deserve it. This is

92 a big time for me a lot of stuff is shifting. And I have accomplished a LOT. How can I ride this wave of

93 accomplishment and joy and not use our relationship as a tool of sabotage to feed into my unworthy victim complex? I

94 do not want to use our relationship to sabotage but to grow and experience the depth of human emotions that are

447  
448  
449  
450

February 1st  
451 I am so tired of hearing it - "but you were such a smart girl how could that happen to you? How

452  
453

could you let that happen?"  
454 Abuse is a subtle thing, the human mind is far more delicate than we like to believe and we are

455  
456

far more irrational than we want to admit. I carry so much shame. My body feels dirty. Before I joined I had only ever been with two people. Looking back I realize I never wanted to sleep with anyone. All of it was forced by either fear, shame, or guilt. I ask myself often how I allowed it to

457  
458

458 happen. They start off with love - experts call it love bombing- bringin you into the fold, making

459  
460

459 you feels special and seen, cared for and valued. Then they pull it away, push you down to the very bottom, expel you from the community, take away your access to purpose and meaning,

461  
462

461 and even at times take away your connection to god. They do this over and over again. Using

462  
463

462 the fear of damnation and ostracization to keep you in. You're broke (financially) and broken

463  
464

463 spirituality. Where would you go anyway with no money and no outside support system?

464  
465

465 Looking back it's amazing how many of the tactics that religions use Nicole and Onetaste used

466  
467

466 as well. The fear of damnation or as they call it "falling off the left handed path". It is a powerful

467  
468

467 force. I was and have never been religious but the longer I was there the more onetaste and

468  
469

468 Nicole began to lean on the idea of god and faith. The thing I realize about god is you must have faith. Within the core of religion is faith and mystical thinking. You are already stretched to

469  
470

469 believe the unbelievable, so what is a little more stretching? A little more magical thinking. When

95 possible  
96 ●

97 ● How can we both recognize the intensity just got stepped up a notch and what we are both embarking on is huge, his

98 body is healing and feeling strong again. He is opening up his sex and shedding his shame. He is allowing himself to

99 love and be loved by a woman and he is wanting her to moving across the country to be with him. He is stepping into

100 his power and purpose in the world.  
101 ●

102 ● I am moving across the country, I am leaning into my resistance, I am

471 you combine this with exhaustion and lack of sleep, dissociative bodily experiences, paranoia, otherness and grandiose thinking it's an intoxicating effect.

472  
473  
474  
475 It feels wonderful to feel special, needed, and loved. To feel like you have a purpose, that god (or spirit or whatever) has a special plan for you. That everything happens for a reason. The chaos and the pain have a purpose. Not only now but everything you experienced before had

476  
477  
478 meaning too. That your life is not a waste. That you are not a waste. And yet, with all the magical thinking and faith anything is possible as reality no longer has boundaries.

479  
480  
481 I remember once being scolded for being late to an event because of traffic. I can laugh at it now to some extent. The belief was that if I was in a turned on state and in alignment with god I could will the universe to do what I wanted (at that moment I wanted it to move the cars out of the way so I was not late) If I wasn't turned on or was disconnected to god then those things would not work. That is how manifestation works, it's how desire works. The universe, i.e. god ie orgasm wants to make you happy and bring joy to your life you just have to believe in it and be open to it. Let it flow through you. And if you don't... then it's your fault and you're not turned on,  
482  
483  
484  
485  
486  
487  
488 open, surrendered, enough.

489  
490 Except it's not. It does not matter how much faith you have rush hour traffic in New York city will never move out of the way because you desire it to. Desire is a thing of privilege and those lucky enough to live in a world or society where they can pursue it.

491  
492  
493  
494 So many of these pseudo sciences and new age ideas use this form of magical thinking to abdicate responsibility. If you're unhappy, if it's not working, if

moving to a city, I am opening up my sexuality

103 and working through my shame complex. I am acknowledging I am a strong woman who has purpose in this world. I

something is wrong it's because

496 you didn't surrender enough, you're not turned on enough, you're blocked, you're not doing x,y,x properly.

497  
498  
499 It's your fault.

500  
501 If it's working they take full responsibility. It was their teachings. Their practices, their ideas.  
502 Proof that this is working.

503  
504 February 5th  
505 I had a beautiful day today. The last few days have been wonderful. Autymn and I spent time on the coast of washington. There is a calm and a wild inspiration that comes from the washington coast. With its sweeping cliffs, black beaches, and crashing waves. Its ancient forests envelope you, holding you close. Here it feels like everything will be ok.

506  
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508  
509  
510 We have talked extensively about my last three years. Slowly, but it is happening, I am reclaiming parts of myself I lost over the last three years. It feels so good to be free. To be on the road to happiness. To know that my life is my own. I am realizing I will never go back to anything like that again.

511  
512  
513  
514  
515 Survivors of abuse often find themselves in patterns of repeated abuse. Again and again. I will not let that happen. I have always been on a path of healing from our childhood. It seems I got lost for a while on the way there. I can see all the threads so clearly now that connected me from my childhood trauma to Onetaste and how they use that to their advantage. How those are the perfect levers to pull.

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521  
522 February 10th  
523 One thing that bothers me is the idea that because somebody does good it absolves them of the bad things they have done. I have had to block people on my phone and remove myself from all social media because I keep getting messages from people telling me how terrible I am, how I

104 am allowing myself to be loved, and I am loving.

105 ●

106 ● Our third is making the choice to stay together on this journey of exploration, it is choosing connection, pain, and love

107 over disconnection and numbness. We deserve this, and the tension, energy, and excitement we are feeling is awesome!

108 It means there is something there, change is happening! This transition for both of us is big and we are feeling it. We are feeling the energy and intensity of the decisions we are making.

526 am "playing victim". They are like a broken record parroting the same things over and over  
527 again, thinking if they convince me they will convince themselves it's true.

528  
529 "They got something out of it"  
530 "It did amazing things for them"  
531 You should throw the baby out with the bathwater  
532 "If it did some good then it cannot be all bad."

533  
534 That maybe.. Just maybe the ends justify the means.

535  
536 Or my favorite is that if "we" talk about all the horrible things that happened then "we", in the name of fairness and justice, should also talk about all the good things that they did too.

538  
539 It doesn't work this way.

540  
541 Doing a minor amount of good never cleanses a person or organization of the abuse and

542 suffering they have caused. You cannot make a wrong "right" by doing good, especially if they are doing them simultaneously.

543  
544  
545  
546 When a company CEO is charged with beating his wife we don't congratulate him on all the

547 great things he has done. When a large corporation like Exxon dumps millions of gallons of oil into the gulf of Mexico do you also make sure to include all the philanthropic money they have donated to other causes.

549  
550  
551 No you don't.

552  
553 As I piece through myself I realize this is the coward's path. Nobody wants to admit that the thing that brought them healing was at the expense of another. That they found joy and

554  
555 connection on the back of another's oppression and abuse. I have also seen that oftentimes

556 people are unwilling to admit they would still continue doing something that they desired even if

557 they knew it was causing harm to others.

<p>110 ●</p> <p>111 ●</p> <p>112 ●</p>			<p>558</p> <p>559 I am so tired of the excuses</p> <p>560 abusers are afforded because others</p> <p>561 are afraid. Because they</p> <p>562 would rather gain something for</p> <p>563 themselves than do what is right.</p> <p>564 There are things in this world</p> <p>565 that are NOT subjective. There are</p> <p>566 things in this world that are wrong</p> <p>567 no matter what way you</p> <p>568 look at them.</p> <p>569 Ends do not justify the means.</p> <p>570 Bad people do bad things and good</p> <p>571 people have bad things done to</p> <p>572 them. There is no grander</p> <p>573 plan, no place where you must take</p> <p>574 responsibility for the horrible</p> <p>575 things others did to you in their</p> <p>576 own cowardice, greed, and evil.</p>
<p>113</p>		<p>=</p>	<p>569</p>
<p>114</p> <p>115 It feels like betrayal to me and to our</p> <p>116 “friendship” when there are sneaky hidden</p> <p>117 intentions. If the intentions are wrapped</p> <p>118 in</p> <p>shame and hidden from site. If you are</p> <p>out and open about wanting to fuck my</p> <p>boyfriend or are saying specifically I am</p> <p>feeling</p> <p>like connecting with you for x reason I</p> <p>am cool with that, it may burn but it</p> <p>probably wont set my vigilance center</p> <p>off. When I</p> <p>can feel hidden agenda, and withholds I</p> <p>begin to question and motivev and</p>		<p>&lt;&gt;</p>	<p>570 It is a very privileged stance in</p> <p>571 life to be able to choose to</p> <p>572 believe that anything bad that</p> <p>573 happens to you is because your soul</p> <p>574 chose it to survive. It means you</p> <p>575 have not faced true pain</p> <p>576 and uncontrolled violene of war,</p> <p>577 rape, environmental destruction,</p> <p>578 death of a child and so on.</p> <p>579 Reality is not wholly subjective.</p> <p>580 As I pick up each shattered piece</p> <p>581 of myself I put them back</p> <p>582 together it becomes more obvious</p> <p>583 where my integrity lies. There must</p> <p>584 be a line in the sand that</p> <p>585 I will not cross. That there are</p> <p>586 places and laws of the known world</p> <p>that govern it. If everything</p> <p>becomes guided by subjective</p> <p>reality then morality becomes</p> <p>fluid. The ends begin to justify</p> <p>the</p> <p>means. You can make excuses for</p> <p>violence that fit your world view.</p> <p>There are many people in this world</p> <p>who will have to one day attone for</p> <p>the things they have</p> <p>done.</p> <p>There is no end that justifies the</p> <p>mean. There are some lines that are</p> <p>not crossed, no matter</p> <p>what belief or theory supports</p> <p>their actions. And no matter how</p> <p>many people you have helped,</p> <p>saved, or good deeds you have</p> <p>committed it does not wash away or</p> <p>negate the pain and abuse</p>

119	intentions. If you approve of your intentions then I can do nothing but approve or		587	you have inflicted upon another.
120 121 122		=	588 589 590	
		<>	591 592 593  594  595 596 597  598 599  600 601 602 603 604 605  606 607 608  609 610 611 612 613  614	<p>February 12</p> <p>It has been over a month and a half since I left. I have started to try and put a timeline together of everything that happened but it's difficult. It was all very intense, fast, and most of the time you're so out of it that you can't remember anything that happened a few hours earlier. They call the chaos RCR or rapidly changing reality because things change so quickly and on the fly. They labeled the disorganization the "feminine".</p> <p>I believe this is by design. Most likely unconsciously by the staff but intentional by the top level leaders. We always switch rooms, beds, sometimes cities. You have no privacy from showering, to going to the bathroom, any space can be invaded. Doors cannot be locked. Your room and bed can be commandeered at any moment for whatever purpose. Your phone is red over the shoulder, you share your fear inventory. You wake up early, work 15-18 hours, OM (and are subsequently dumped full of cortisol and serotonin) 3-4 times a day, enrouaged (and sometimes down right forced) to have sex or a "makeout" all the time. Hot yoga and other meditation based practices all while getting little to no sleep. There was never a moment I was able to take a breath. To slow down. To process feel and think. I felt like I was running at full speed and this last month I stopped abruptly and everything has caught up with me washing over me in a giant wave.</p> <p>February 13th</p> <p>Valentine's day is tomorrow. I think of Ravi often these days. This will be the first valentine's day without him. Our relationship was filled with so much pain. It hurts</p>
123	I had this really amazing epiphany yesterday. So there is this conditioned idea of either women are "sisters" and they stick			

#: 4256

615 to think of him. I thought I  
616 loved him. Maybe I did.  
617 I wonder if he ever loved me. And  
then I wonder if it even mattered  
618 if he loved me. Would it  
make a difference? Make anything  
619 that happened better or worse? What  
he did to me last  
620 month with Aubrey and NDI was one  
of the most painful moments of my  
621 life. To go to bed  
believing we were engaged and still  
622 in a relationship, to finding out  
the next day he had married  
623 another woman with all your friends  
and community with nobody telling  
624 you. I believe they  
married Ravi to Aubrey because they  
625 wanted to get rid of me. I was  
becoming a nuisance those  
626 last months I was there. Sick,  
depressed, angry, crying all the  
627 time. Unable to work. I asked  
Rachel why nobody told me. Why did  
628 nobody inform me? She told me it  
had "slipped their  
629 minds" and there "wasn't a good  
time."  
630  
631 Wasn't a good time to tell me that  
my boyfriend of 3 years, who I had  
632 thought I was engaged to,  
had met and married another woman  
633 during a 2 week immersive  
experience surrounded by my  
634 entire team, community, and  
teachers....  
635  
636 Nobody thought it relevant that I  
should know.  
637  
638 I see now it was all by design. I  
was the only team member from New  
639 York not allowed to go to  
NDI. I needed to manage the nyc  
640 community and go to Miami for the  
sister goddess conference  
641 they said. For me to find out from  
Rob who had left onetaste was... I  
don't even have the words.  
642 Horrifying, disgusting, hurtful,  
traumatizing. Take your pick.  
643  
644 And to think after years of him  
telling me he wanted to have an  
645 open relationship, to sleep with  
other women, me wanting only to be  
646 with him they - all the newly wed  
couples from NDI-  
647 become monogamous. He sat on that  
stage with her telling everyone how  
648 it's all he ever  
wanted. The betrayal.

124 together and rally against men and have  
an unbreakable loyalty towards eachother,  
or they are with there man/men and  
against



642  
643 That was the thing with our  
relationship though. It was up and  
down and all over the map. Ravi  
644 was on all accounts an abuser  
before we joined. They sanctioned  
his violence. He hit me more  
645 than once. The last time was in his  
parents penthouse in Trump Tower in  
Chicago over the  
646 holidays. He punched me in the  
face. I remember sitting there in  
that white leather chair  
647 overlooking a frozen, desolate Lake  
Michigan. The wind howling, the  
building seeming to sway.  
648 The apartment was sparse and cold.  
Massive and empty. The floor to  
ceiling windows give this  
649 feeling of being far above the  
world on another planet. Removed.  
And it didn't matter if I told  
650 anyone because they would tell me I  
had made him do it. It was my  
fault. Everything that went  
651 wrong in our relationship was  
always my fault.  
652  
653 I wasn't turned on enough, sexy  
enough, open enough, surrendered  
enough. I was scared,  
654 being guided by fear. I was closed  
and not letting "god" in. I was  
desiring to control him and  
655 keep him "small" because I was  
afraid. Was I such a selfish person  
that I would want his soul to  
656 never find transcendence?  
657  
658 I think of it now and it all seems  
laughable. And people who never  
experienced this often do  
659 laugh at how people could believe  
this stuff. Talk of souls, twin  
flames, the ability for us to have  
660 karmically chosen people to be our  
teachers but I realize that every  
romance novel, movie, and  
661 story has prepped me for this  
exact belief. We all want to  
believe we are special, that there  
is  
662 somebody out there that will love  
us for exactly who we are  
unconditionally- especially if we  
663 grow up believing we are  
unlovable. We want to believe  
there is some design to this  
madness.  
664 That life has purpose.  
665  
666 It was a fitting scene, almost  
ironic. Me sitting in a large empty  
penthouse in Trump tower as my

125 other women. We are pitted against each  
other. Catfights, cattiness, fighting,  
competition, who is prettier, funnier,  
sexier, more

667 wealthy boyfriend hits me. It plays  
out like every movie, book, and sad  
668 story. The naive young  
girl from the country is enchanted  
by the older mysterious, educated  
669 man. He whisks her away  
into a fairy tale that quickly  
becomes a nightmare. Trapped, far  
670 away from home and family. No  
money. No ability to escape. I  
often think of beauty and the  
beast. Except in the fairy tale  
671 the  
beast transforms. Her love saves  
him.

672  
673 People ask me why I stayed. Why  
didn't I leave when he first hit  
me. How had I fallen into the  
674 very senario I had promised myself  
I wouldn't. That's the thing, this  
stuff sneaks up on you. He  
675 didn't start out like that. I had  
thought he loved me. Cared for me.  
Maybe he did it in his own  
676 way. I have no idea and I'll never  
know... maybe it doesn't matter in  
the end if he did love me or  
677 not because the cruelty and the  
abuse would have happened either  
way.

678  
679 Part of me believes it's better to  
believe he was sick and hurting and  
that is why he hurt others.  
680 Sometimes I like to believe the  
same thing about Nicole. That she  
is sick and suffering and that  
681 is why she hurts others. It feels  
worse to believe people are capable  
of hurting others out of  
682 pure self indulgence and  
maliciousness, knowing exactly what  
they are doing. In the end does it  
683 make a difference why they did it?  
They still did it, it still caused  
the same pain and trauma. Still  
684 used and abused people for personal  
gain.

685  
686 The sesawing between wonderful days  
full of joy and the darkness of  
fighting, leaving me alone,  
687 kicking me out of the apartment,  
sleeping with other women, trying  
to force me to sleep with  
688 other men, telling me I am  
worthless, not good enough, stupid,  
and dumb. That I am young and  
689 naive.

690  
691 But why does any woman stay in an  
abusive relationship? Because we  
believe we are worth no

126 desired? This feeds our feelings of never being good enough, our feelings of isolation and abandonment. It disconnects us from

692 better. We believe we can help them  
693 heal. That love is the elixir that  
694 heals all wounds and if we  
695 just love them enough eventually  
696 they will love us back. That one  
697 day all the pain will be worth it  
698 if we just stick it out.

699 And as the relationship progresses  
700 through the shame, abuse, hurt,  
701 abandonment, and  
702 physical violence I forgot who I  
703 was and began to believe what he  
704 said about me. He was a  
705 masters at manipulation. When we  
706 fought I often found myself  
707 apologizing for something I had  
708 ended up making "him do". If that  
709 didn't happen I was showered with  
710 gifts and expensive trips.

711 And they always had a reason why I  
712 should stay - Rachel, Rob, Rachel  
713 Hemsli, and all the upper  
714 staff. Everytime I tried to leave  
715 or got the courage to stand up  
716 there was a reason I had to stay.

717 February 20th

718 The dream still haunts me. Every  
719 night it's the same dream on loop.  
720 I believe this is my most  
721 prominent feeling and betrayal from  
722 my time there. The feeling of being  
723 abandoned, of everyone

724 who you thought cared about you  
725 turning their back as you were torn  
726 apart too afraid to speak  
727 up.

728 This is how they isolate you over  
729 and over again. Eroding trust and  
730 feeding paranoia.

731 A moment I replay in my mind over  
732 and over again because it perfectly  
733 signifies the betrayal for  
734 me and how it becomes ok. Everyone  
735 knew I didn't want to sleep with  
736 others, they knew that  
737 Ravi sleeping with other women hurt  
738 me and I never liked it. I was  
739 never able to be ok with it. I  
740 let it happen because what else was  
741 I supposed to do?

742 Brooke and I were close. Sisters  
743 almost. That's how we referred to  
744 each other. Of all the people  
745 her and hamza I trusted. Believed  
746 they would always stand up for me.  
747 Care for me and never

127 each other and from ourselves. We can be each others greatest teachers and allies due to the mere fact that we are women and we

721 force me to do something or do something themselves that would cause me pain.  
722  
723 It happens often at onetaste. Women would come up to me to "ask" if they could sleep with  
724 Ravi. They were going to do it anyway because they "had to follow their desire" and if they didn't  
725 follow their desire because I didn't want them to, or because it hurt me, then I was forcing them  
726 to play small. It would be "my fault", as always.  
727  
728 That's what they do. They tell you you should always follow desire. Always "speak the truth".  
729 What it becomes is adults acting like self centered petulant teenagers pretending the thing they  
730 are doing is hurting nobody and that their "desires" are of the utmost importance indifferent of  
731 who it hurts or the trust it breaks. That the ends justify the means.  
732  
733 I had thought Brooke would never sleep with Ravi. I had thought she knew how much he meant  
734 to me. How much pain I was in because of it. I remember the moment like it was yesterday. It  
735 was an event, I don't remember which. Brooke comes up to me. Her eyes wild. And tells me she  
736 has to sleep with more men to increase her "power". I don't remember why she needed to.  
737 There wasn't time for her to find them on tinder or within the community. It had to be now. I knew what she was asking.  
738  
739  
740 I had thought she would never ask. That should have cared enough about me that this boundary  
741 would never be crossed. But it doesn't matter about care. Because I imagine she does care  
742 about me. But the repercussions, the shame, the fear is greater than my feelings or our  
743 friendship... Sisterhood.  
744  
745 I agreed of course. What else could I do?  
746  
747 Fight it? Be the reason she wasn't turned on. Deny her growth. I knew also the punishment and

748 ostracization I would receive if I  
 749 said no. As I said yes a small part  
 of me died. If a soul could  
 750 bleed, it felt like I had  
 eviscerated myself and my life  
 blood was pooling at my feet.  
 Brooke was  
 751 the last one. A safe place. They  
 always find a way to break the  
 bonds you build with others so  
 752 the only thing that binds you is  
 your mutual trauma and fear.  
 753 They say you have a NO. That they  
 teach women how to say no. To  
 empower women in their  
 754 sexuality and desire. But they  
 don't. They only teach you to say  
 yes. To fall deeper into that  
 755 childhood conditioning of pleasing  
 others to avoid pain. Keep silent  
 quietly crying until it's over  
 756 and you can curl into a ball and  
 sob alone hiding your shame but  
 knowing survival depends on  
 757 you staying silent. Because by this  
 time you're so entrapped you feel  
 like you have no way out.  
 758  
 759 No money, no family, no friends  
 outside the organization. Nowhere  
 to go.  
 760  
 761 It's easier to say yes. To grin and  
 bear it. To do what women have done  
 for a millennium, fake it  
 762 with a coy smile. With a breezy  
 laugh. To be lighthearted and  
 filled with joy while you die  
 inside.  
 763 Take the thing you want and shove  
 it deep down inside you because  
 everybody is more  
 764 important than you are, the cause  
 is more important than you are.  
 765  
 766  
 767 It is very clever to hide the  
 misogyny and oppression under a  
 veil of empowerment. Under third  
 768 wave feminism and watered down  
 easter philosophy. To tell them  
 you're helping set them free  
 769 as you build tighter and tighter  
 cages around them. I remember  
 reading the handmaid's tale. It's  
 770 not the powerful men who uphold the  
 oppression, the abuse. But the  
 women, the aunties, and  
 771 those who gain something from the  
 subjugation. It is those who are  
 complacent.  
 772  
 773 This is something I come back to  
 again and again. Either out of fear

128 understand on a physical, emotional,  
spiritual level what it means to be a  
woman, in a womans, body in our society.  
we are

774 or out of self indulgence,  
complacency is what allows  
atrocities to happen. People are  
afraid so they turn a blind eye.

775  
776 Or they are getting something they  
don't want to do without.

777  
778 Power, privlidge, sex, freedom,  
growth. Whatever it is they are  
getting something and they  
779 would rather turn a blind eye or  
create elaborate stories of denial  
why it is ok as long as they are  
780 getting something good from it. It  
can't be all that bad if their  
experience is positive. You can  
781 downplay the bad if there is "some  
good"

782  
783  
784 February 22nd  
785 I feel better today. I am learning  
compassion for myself. I have been  
taking walks with Noka  
786 every day.I missed her so much  
while I was in New York. I am not  
sure I could have gotten  
787 through this without her. The  
unconditional love of a dog is  
really the sweetest remedy. The  
788 long silent walks through the  
forest remind me there is something  
bigger than myself. That I am  
789 one small part of a much bigger  
world. That onetaste and New york  
and everything that  
790 happened was one small corner of  
the world and if I get through this  
I will be able to rebuild my  
791 life. My sister and I talk almost  
every day. My grief and numbness  
melted into rage. I know I do  
792 not want to stay in rage. To  
become it. But it feels good to be  
angry. To let myself feel. The  
793 body really does freeze under  
stress. Become solid and  
impenetrable and it feels like  
finally 2  
794 months later I am thawing.

795  
796 I was reading the book Post  
Traumatic Growth Guide and I used  
to believe I was a survivor,  
797 that I was stronger, more  
resilient, a better person because  
of the things I went through. That  
it  
798 was those things, those outside  
forces that defined me and made me  
who I was.

799

129 different yet, intrinsically the same. If we can have intimate partnerships by design then we can have relationships by design as

130 well. Who says that if you're my "girlfriend" and we share everything that you also don't want to fuck my boyfriend. Or that

131 because we are "best friends" it means we share everything and anything and at all times. Maybe we all we do is makeout,

132 connect, and drink coffee together and that's all the relationship desires... Can we move beyond the constructed conditioned ways

133 of friendship, and interacting with women to a place or organic creation that approves of everywoman exactly where she is and

800 Now I know it is not because of them but in spite of them. I used to use it as a reason to define why I was strong. WHY I mattered.

801  
802  
803 Who we are, deep in our core is always there. Bad things happen to good people. I am no better off because of what I have suffered.

804  
805  
806 I think about this often. It is far simpler to believe in the idea that growth and positivity can come from terrible things. It lets us believe that the pain and suffering was not in vain. Where would I

807  
808 be in life or who I would be if I had never experienced any of this?

809  
810 Even without these experiences I would still be me. I would be on a slightly different path but still me. I think we often believe we need pain or suffering to grow. That hardship is how we become deeper wiser versions of ourselves. That to know compassion, empathy and humility we need to experience the other side.

811  
812  
813  
814  
815 Onetaste used this to their advantage. The more pain I was in the more "growth" I was going to experience.

816  
817  
818 I often find it is easier to take the simpler path. To tell myself stories about what happened to make it more palatable. All those years, all that pain and wasted time goes down easier if I can believe that I got something out of it. It makes Onetaste the catalyst for my growth. It makes the rapist, abusive parents, and broken social system the catalyst for me to be a better version of

819  
820  
821 myself. That I need pain and trauma to grow.

822  
823  
824 I survived, healed, and became better not because of them but in spite of them. It was my hard work, my integrity, my compassion that has made me who I am. That helped me survive.

825  
826  
827 We become transfixed on creating meaning and reason for the terrible things that happen

134	honors what she can offer us in every capacity.		828 829 830 831 832 833 834 835	because it is harder, and much more terrifying to admit that bad things happen to good people and that they didn't need to. If we claim "my soul chose this" or that its karmic and in some way part of a larger grand plan  1. We then regain control because at some point we "chose it"  2. Pain, suffering, wasted time have meaning then and that desolate feeling that we wasted moments of this fleeting life or that others can invariably
135		=	836	
		--+	837 838 839 840 841 842 843 844 845 846 847 848	



**EXHIBIT C: COMPARISON OF FILE “JOURNAL 2” VERSIONS MAY 27 2022 7:05 AM & MARCH 9 2023 6:58 AM**

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Journal 2 May 27 2022 705 AM & Journal 2 March 9 2023 658 AM Text Compare Report  
Produced: 10/11/24 17:25:08

Mode: All

Left file: /Users/quandary/Library/CloudStorage/GoogleDrive-jason@quandarypeak.com/Shared drives/One Taste v Blanck/report/Journal 2 May 27, 2022, 705 AM linebreaks.txt

Right file: /Users/quandary/Library/CloudStorage/GoogleDrive-jason@quandarypeak.com/Shared drives/One Taste v Blanck/report/Journal 2 March 9, 2023, 658 AM linebreaks.txt

1	February 24th	=	1	February 24th
2	Today was difficult. I didn't sleep last night. I realize all the things I once found calming and healing have been		2	Today was difficult. I didn't sleep last night. I realize all the things I once found calming and healing have been
3	bastardized. I attempted to do yoga and meditate but it's laced with acid and pain. All those moments of		3	bastardized. I attempted to do yoga and meditate but it's laced with acid and pain. All those moments of
4	"meditation" attending hot yoga.		4	"meditation" attending hot yoga.
5			5	
6	The practices I once found solace in now hold pain.		6	The practices I once found solace in now hold pain.
7			7	
8	It is hard to escape the memories and the involuntary reactions of my body. It is outside of my control. They stole		8	It is hard to escape the memories and the involuntary reactions of my body. It is outside of my control. They stole
9	everything from me. My sense of dignity, my femininity, my relationship to practice and meditation, my 12 step		9	everything from me. My sense of dignity, my femininity, my relationship to practice and meditation, my 12 step
10	practice. That one hurts deeply. I have been attending Alanon since I was 16. They bastardized 12 step. Weaponized		10	practice. That one hurts deeply. I have been attending Alanon since I was 16. They bastardized 12 step. Weaponized
11	and used as a tool of manipulation and control. I cannot attend a meeting without breaking down. My hands start to		11	and used as a tool of manipulation and control. I cannot attend a meeting without breaking down. My hands start to
12	shake, my vision goes blurry. I have tried a few times but the memories are too strong.		12	shake, my vision goes blurry. I have tried a few times but the memories are too strong.
13			13	
14	On some deeper level they took my relationship to myself and spirit. I used to believe the world was imbued with		14	On some deeper level they took my relationship to myself and spirit. I used to believe the world was imbued with
15	magic. Not fairy magic but the world had a sparkle to it. A sense of something deeper working under the surface. I		15	magic. Not fairy magic but the world had a sparkle to it. A sense of something deeper working under the surface. I
16	was never religious nor do I believe in god, at least in the christian sense of the word. But I always believed there		16	was never religious nor do I believe in god, at least in the christian sense of the word. But I always believed there
17	was something more to the world than just a combination of organic matter. Where spirit used to sit within me is		17	was something more to the world than just a combination of organic matter. Where spirit used to sit within me is
18	now a gaping hole. The world's magic, its spontaneity and beauty now hold pain and suspicion.		18	now a gaping hole. The world's magic, its spontaneity and beauty now hold pain and suspicion.
19			19	
20	Is it actually magic or paranoia?		20	Is it actually magic or paranoia?
21			21	
22	Was it brought on by something truly beautiful and unseen or the splitting		22	Was it brought on by something truly beautiful and unseen or the splitting

and dissolution of my mind?  
 23  
 24 I can't tell.  
 25  
 26 I fear I'll never be able to rebuild  
 my relationship to spirit-god-universe  
 whatever you want to call it. I  
 imagine this  
 27 must be how those escaping the mormon  
 church and other radical religious  
 sects must feel. Life after you leave  
 must  
 28 become flat, because if it doesn't,  
 the uncertainty and paranoia consumes  
 you. It is hard to believe in magic  
 or  
 29 something greater than myself when:  
 30  
 31 1. That belief feels like the catalyst  
 and the doorway for what allowed  
 onetaste to worm their way into my  
 mind  
 32  
 33 2. I have such a delicate grasp on  
 reality that anything slightly magical  
 feels like it will send me into a  
 spiral I won't  
 34 be able to climb out of.  
 35  
 36 I see myself craving the physical.  
 Things I can touch, feel, experience.  
 Ideas that have solidity behind them  
 and are  
 37 concrete. The metaphysical or  
 spiritual sends me into a spiral.  
 38  
 39 February 26th  
 40 Today feels particularly melancholy.  
 The grief is still here. A constant  
 numbing force. A guest in my house as  
 Rumi  
 41 would say.  
 42  
 43 I am still tired. I am still thin. Not  
 as thin as before but not healthy. I  
 still struggle to eat much of  
 anything. Not much  
 44 brings me joy anymore. All I want to  
 do is sleep, except when I sleep, if I  
 don't take sleeping pills, my mind is  
 45 consumed with night terrors and dreams  
 of Nicole finding me.  
 46  
 47 I try to find gratitude in the small  
 things. To find grace and  
 understanding in how and why I feel  
 the way I do. To  
 48 wake up everyday and put one foot in  
 front of another. This is something I  
 have kept from 12 steps. One day at a  
 49 time. I do not know what I will do in  
 the next 6 months or the next year. I  
 cannot even imagine where I will be in  
 a

and dissolution of my mind?  
 23  
 24 I can't tell.  
 25  
 26 I fear I'll never be able to rebuild  
 my relationship to spirit-god-universe  
 whatever you want to call it. I  
 imagine this  
 27 must be how those escaping the mormon  
 church and other radical religious  
 sects must feel. Life after you leave  
 must  
 28 become flat, because if it doesn't,  
 the uncertainty and paranoia consumes  
 you. It is hard to believe in magic  
 or  
 29 something greater than myself when:  
 30  
 31 1. That belief feels like the catalyst  
 and the doorway for what allowed  
 onetaste to worm their way into my  
 mind  
 32  
 33 2. I have such a delicate grasp on  
 reality that anything slightly magical  
 feels like it will send me into a  
 spiral I won't  
 34 be able to climb out of.  
 35  
 36 I see myself craving the physical.  
 Things I can touch, feel, experience.  
 Ideas that have solidity behind them  
 and are  
 37 concrete. The metaphysical or  
 spiritual sends me into a spiral.  
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 49 time. I do not know what I will do in  
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 cannot even imagine where I will be in  
 a

<p>50 month. For now its one day at a time. Each hour, each day slowly chipping away. Thawing and letting go until</p>		<p>50 month. For now its one day at a time. Each hour, each day slowly chipping away. Thawing and letting go until</p>
<p>51 eventually I hope that enough pain as been released that joy and dreams of the future will replace it. That one day</p>	<>	<p>51 eventually I hope that enough pain has been released that joy and dreams of the future will replace it. That one day</p>
<p>52 I'll be filled with delight and joy again.</p>	=	<p>52 I'll be filled with delight and joy again.</p>
<p>53 54 February 28th</p>		<p>53 54 February 28th</p>
<p>55 I have a massage scheduled. It is my first one in a very long time. It is actually the first human touch my body will 56 experience since I left. My god-mother and sister have hugged me at times. But anything more intimate my body 57 recoils from. For so long I had no boundaries. I could not say no to touch, to sexual advances, to caress, or to 58 physical violence. They take away your boundaries. You're NO until it is a distant memory and you live in a haze.</p>		<p>55 I have a massage scheduled. It is my first one in a very long time. It is actually the first human touch my body will 56 experience since I left. My god-mother and sister have hugged me at times. But anything more intimate my body 57 recoils from. For so long I had no boundaries. I could not say no to touch, to sexual advances, to caress, or to 58 physical violence. They take away your boundaries. You're NO until it is a distant memory and you live in a haze.</p>
<p>59 Your body numb to the assault of sexual advances, Oming. Deadened to its screams of protest.</p>		<p>59 Your body numb to the assault of sexual advances, Oming. Deadened to its screams of protest.</p>
<p>60 61 Ugh the thought of being touched by any of them.</p>		<p>60 61 Ugh the thought of being touched by any of them.</p>
<p>62 63 The cold clinicalness of OM. Letting strangers stroke you. As much as they wanted to divorce it from sexuality, from intimacy you can't.</p>		<p>62 63 The cold clinicalness of OM. Letting strangers stroke you. As much as they wanted to divorce it from sexuality, from intimacy you can't.</p>
<p>64 65 66 Its impossible.</p>		<p>64 65 66 Its impossible.</p>
<p>67 68 Maybe this is where Nicole went wrong. She tried to take something inherently based in the body. Based in 69 connection to another human being. Something deeply intimate no matter how you frame it or structure it and 70 divorce it from that to commoditize it. Sex, intimacy, physical touch will never be like yoga, like getting a latte. And 71 it shouldn't be.</p>		<p>67 68 Maybe this is where Nicole went wrong. She tried to take something inherently based in the body. Based in 69 connection to another human being. Something deeply intimate no matter how you frame it or structure it and 70 divorce it from that to commoditize it. Sex, intimacy, physical touch will never be like yoga, like getting a latte. And 71 it shouldn't be.</p>
<p>72 73 No matter how emotionless you want it to be, it will always be an intimate connection between people. I think this is 74 what caused so much confusion and pain for myself and others. Sleeping with random people, having our partners 75 betray our trust and sleep with others. To share intimate parts of ourselves with practical strangers and then tell 76 ourselves it was like "getting a latte" caused extreme levels of</p>		<p>72 73 No matter how emotionless you want it to be, it will always be an intimate connection between people. I think this is 74 what caused so much confusion and pain for myself and others. Sleeping with random people, having our partners 75 betray our trust and sleep with others. To share intimate parts of ourselves with practical strangers and then tell 76 ourselves it was like "getting a latte" caused extreme levels of</p>

77 dissonance. Sharing yourself sexual, physically even  
78 through OM is not a small matter. The hormone, psychology, and biology that  
79 combine to make bonding and  
80 intimacy happen is not like ordering your double shot cappuccino from a  
81 barista at Starbucks.

82 It is stretched even further when these practical strangers are said to  
83 be your family, that you can trust them when in  
84 reality none of the evolutionary and biological bonds of family and tribe  
85 building happen. It's like being a teenager  
86 and having sex for the first time. Flooded with attachment hormones.  
87 Confusion at what it all means. An intoxicating cocktail of love, joy,  
88 fear, shame. Imagine now divorcing that from all reality and attachment.  
89 All the  
90 strictures of safety, consistency, and love. As your body dumps you full of  
91 serotonin and endorphins having to convince yourself its just "energy"  
92 its actually "god" moving through you. Not a very real, very strong  
93 biological  
94 response and evolutionary mechanism.  
95 Ugh.

96 What a horrifying world to live in where touch and intimacy between two  
97 people is no more than an exchange to be  
98 examined for personal gain. Your body is quite literally screaming at you  
99 that this means more than just a clinical  
100 experiment. More than removed, disconnected meditation but you're  
told over and over again to shut that part out to  
not think... essentially not not feeling.

101 The practice designed to get you back into your body, to build connection  
102 was the tool wielded by onetaste to violate your boundaries, to dehumanize  
103 you and remove you from connection to yourself.

104 March 1st  
105 I am getting towards the end of The Cult Recovery book. A couple things  
106 really stand out to me. One is the description of "love bombing". It  
107 makes sense why they pray for people

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107 makes sense why they pray for people

101 who are lonely, broken, or hurting. People  
 102 with strained connections to family or  
 103 without a close community. Love  
 104 bombing is essential where you shower  
 105 and  
 106 individual in love, attention, care,  
 107 and connection. Usually for 3-6  
 108 months. For individuals who are lonely  
 109 or have  
 110 struggled to make friends. For people  
 111 who have recently experienced intense  
 112 grief or abandonment through divorce  
 113 or death. Or for those who believe  
 114 they are unlovable. They bombard you  
 115 with attention. Seeming to care about  
 116 who  
 117 you are, your struggles. They see you  
 118 as special and valuable. It fills a  
 119 hole inside of you left by trauma,  
 120 grief, or  
 loneliness.

108 Then after an individual has been  
 109 thoroughly brought into the community.  
 110 Bombarded with love they withdraw it.  
 111 This is done in a way where it is  
 112 usually "your fault" YOU did something  
 113 to fall from grace. Something that  
 114 puts  
 115 you at odds with your new community,  
 116 your new family and YOU need to do  
 117 something to fix it. When I look back  
 118 on my time there this is exactly how  
 119 it played out. I was love bombed.  
 120 Attention and delicate care showered  
 on me  
 until I was thoroughly entrapped and  
 could not leave. Then the rug was  
 pulled out.

114 It is very important. According to the  
 115 cult Recovery book for this to happen.  
 116 It creates a power imbalance and then  
 117 you must work to make it right. You  
 118 must bow down to them. It is the first  
 119 initiation, even if you're not aware  
 120 of it.

116 If after the first time they pull the  
 117 love and community away and you leave,  
 118 you would never have been a good  
 119 candidate for the long term. But if  
 120 you stay. If you "work" and submit and  
 get back in their good graces the  
 terror of  
 being ostracized again is a strong  
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121  
122 Ravi did this to me often. As did  
onetaste. After the first six months  
were up, they kept me on the roller  
coaster. One  
123 moment it's magical, the next, for  
whatever reason, you're at the bottom  
again. The first time Rachel did this  
to me  
124 was when Ravi hit me. Blaming me and  
making it my fault. After that it was  
when I refused to OM with anybody  
125 else besides Ravi and was being  
"difficult". Then when I wouldn't have  
sex with another person that wasn't  
Ravi.  
126 When I wanted to get a job. Over and  
over again until I was unsure if I  
could make it out if I ever did leave.

127  
128  
129

130 March 3st  
131 I revisit my last 6 months often. They  
made me sleep on the floor. I had no  
place of my own. I lived out of a  
132 suitcase. No home. Nothing of my own.  
I was not paid. I had no money. I was  
sick and nobody seemed to care.  
133 Caught up in their own insanity I was  
alone yet surrounded by "friends" and  
"community". I remember talking to  
134 Rachel Hemsli and being told not to go  
to the hospital. That all the shaking,  
the vomiting, the weightlessness, the  
135 sickness was just an "orgasm". It was  
me alchemizing trauma and pain from  
when I was younger. That if I just  
136 stuck with it I would ascend to my  
next level of awakening and freedom.  
As I wasted away I'm not sure if  
anybody

137 reached out to help me. To offer me  
solace or care because as far as the  
upper staff was concerned I had a  
"virus".

138 That I was an addict. Not a real  
addict, addicted to substances. What I  
was an addict for I do not know. But  
if you

139 are not behaving or you are unhappy  
its because you are an addict. It is  
the catch all phrase they use to push  
you to

140 do more "practice."

141

142 More Oming.

143

144 More sex.

145

146 More yoga.

147

148 More 12 step meetings.

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150 At one point I was attending 4-5 12  
step meetings a day like a drinker who  
151 couldn't put down a bottle. Except I  
didn't drink, do drugs, or even have  
sex at that point as it was too  
painful and I would become sick.

152  
153 I think they believe that if you hear  
enough times you just need to  
surrender to god, that you need to  
follow gods  
154 will you will start to give up and  
give in. Start to believe that Nicole  
and Orgasm and god and what is  
happening is  
155 what is supposed to happen. That this  
is all of your own making.

156  
157 How did I go from being a bright and  
happy college graduate with the world  
in front of her to the young woman  
158 near death sleeping on the floor of a  
New York City apartment physically  
sick and spiritually broken.

159  
160 I had fought my entire life to attend  
college. I had dreamed of building a  
better life for myself. College, and  
to  
161 graduate was my single minded focus.  
It is what pulled me through the fear,  
the loneliness, and the abuse of my  
162 teenage years. After I graduated I had  
a job lined up in San Francisco. I had  
family in San Francisco. Friends.

163  
164 When Ravi wanted to move to New York I  
had not realized how alone I would be.  
How far away from everything I  
165 had ever know. I see now after college  
I was disoriented. I had accomplished  
the thing I had been working for my  
166 entire life. Swept away to New York I  
was left without anything to hold  
onto. No job, no family, friends, or  
167 direction. I was alone in a sea of  
uncertainty that comes after college  
as you move into young adulthood and  
a  
168 career, with Ravi my lone island of  
solidity.

169  
170 But he wasn't solid. He was ever  
changing, every moving and hardly  
there.

171  
172 I was vulnerable.

173  
174 Not only from my childhood trauma but  
because I was utterly alone in the  
world at that moment. I was in a new  
city  
175 thousands of miles away from anybody I  
knew, within a new relationship, in a  
new socio economic sphere.

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176  
177 I remember my first days in New York.  
178  
179 It felt like I was walking on  
quicksand. Ever moving. Any moment the  
ground would open up and swallow me.  
180  
181 Everyone around me said the tears, the  
sadness was all part of moving to New  
York. That eventually it would stop.  
182 That the sadness, loneliness, and the  
fear I was feeling was normal. And  
maybe it was to an extent.  
183  
184  
185 Except the community I became  
connected to was toxic. My  
relationship was toxic and before I  
knew what had  
186 happened I was entwined and trapped.  
187  
188  
189  
190 March 4th  
191 I never wanted to have sex.  
192  
193 I can admit that now.  
194  
195 Not with Peter, not with Ryan or  
Hamza, Not with Eli or Kozer. Not with  
Josh or Moe or any of the other  
clients.  
196  
197 My silent tears were not orgasmic  
energy being released. It was not me  
"processing trauma".  
198  
199 The numbness I felt each time. The  
pulling in on myself.  
200  
201 It all was forced and my body feels  
filled with shame and disgust.  
202  
203 I had only had sex with 2 people  
before I met Ravi. Three if you count  
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204 people. I never wanted to have my body  
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body  
205 has been violated.  
206  
207 I wonder if any of them would say it  
was forced. Does it still count as  
assault if the women goes willingly  
out of  
208 fear, shame, or because she is told it  
is the right thing to do?  
209  
210 Does it count if she does it because  
she is afraid of spiritual damnation.  
Fear of ostracized and left homeless  
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212

213 Does assault of the mind count towards  
the assault of the body?

214

215 Can you be raped, can you claim rape,  
if you're No was meek? If your body  
said no but your voice couldn't quite  
216 form the words?

217

218 If a tree falls in the forest and  
nobody hears it... did it still make a  
sound?

219

220 If nobody hears it. If you bury it  
down. If you fake it and smile does it  
count?

221

222 I think of all the times when Ravi had  
sex with me and I didn't want to.

223

224 All the times I was forced to be  
turned on.

225

226 All the times I played coy and  
flirtatious like a good girl.

227

228 No man wants to sleep with a sad and  
weepy woman.

229

230 They would prefer their women in  
denial, turned on, faking it even when  
its obvious they are a no.

231

232 It's so much easier to pretend  
ignorance. Brush it under the rug if  
you can point a finger and say "see  
she asked for  
233 it. She made me do it... She wanted it"

234

235 So much easier to get what you want,  
to satisfy yourself and look no  
deeper. Because if you look deeper you  
might  
236 have to face your own humanity, feel  
another's pain and not get what you  
want.

237

238 But its your desire. You should follow  
it. Her resistance is just her fear of  
growth and of freedom.

239

240 It is her virus, her conditioning, her  
trauma trying to keep her small.

241

242 Consent at onetaste is a blurred  
line.

243

244 All the easier to blur using new age  
spirituality, slick one liners around  
growth, transformation, and "playing  
small".

245

246 Where you are so disoriented, afraid,  
and fucked up that the only time you  
realize how deeply you were violated  
is

213 Does assault of the mind count towards  
the assault of the body?

214

215 Can you be raped, can you claim rape,  
if you're No was meek? If your body  
said no but your voice couldn't quite  
216 form the words?

217

218 If a tree falls in the forest and  
nobody hears it... did it still make a  
sound?

219

220 If nobody hears it. If you bury it  
down. If you fake it and smile does it  
count?

221

222 I think of all the times when Ravi had  
sex with me and I didn't want to.

223

224 All the times I was forced to be  
turned on.

225

226 All the times I played coy and  
flirtatious like a good girl.

227

228 No man wants to sleep with a sad and  
weepy woman.

229

230 They would prefer their women in  
denial, turned on, faking it even when  
its obvious they are a no.

231

232 It's so much easier to pretend  
ignorance. Brush it under the rug if  
you can point a finger and say "see  
she asked for  
233 it. She made me do it... She wanted it"

234

235 So much easier to get what you want,  
to satisfy yourself and look no  
deeper. Because if you look deeper you  
might  
236 have to face your own humanity, feel  
another's pain and not get what you  
want.

237

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246 Where you are so disoriented, afraid,  
and fucked up that the only time you  
realize how deeply you were violated  
is

247 when you leave and it all comes crashing down on you.

248  
249 When you have space to feel.

250  
251 This is why they keep you unfeeling and your nervous system overwhelmed. They don't want you to realize that  
252 your body is a no but your mind is saying yes - if only out of fear and confusion.

253  
254  
255

256 March 7th  
257 I have started to pick out moments that highlight the crazy for me. When I juxtapose reality with what I am now

258 seeing as insane moments I get a better grasp on my mind. It helps to solidify it was real and not just some crazy  
259 nightmare.

260  
261 I remember a moment before I left when I was in LA.

262  
263 It was, I think, 2 weeks before I left for good.

264  
265 I was in the house in Santa Monica sitting on the couch.

266  
267 One moment everything was calm.

268  
269 The house was fine.

270  
271 The next moment pandemonium had broken loose.

272  
273 I watched as everyone ran around cleaning the house and organizing things.

274  
275  
276 Leah turned to me, as I was the only one still sitting on the couch, and said "Nicole is coming, we need to clean the  
277 house. Why are you just sitting there?"

278  
279 It took me a moment to comprehend what she was saying. It felt like I was in slow motion and that everyone around me had sped up.

280  
281  
282 Nicole would be arriving within 10 minutes. Everyone had dropped everything they were doing, and started to run

283 around in a frenzy of madness for her arrival.

284

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283 around in a frenzy of madness for her arrival.

284

285 This was a house full of adults who had jobs and lives. Things they were doing. Adult people acting like god himself  
 286 was paying us a visit.  
 287  
 288 Though I imagine even if god had visited he wouldn't much care if the house was messy.  
 289  
 290 The irony....  
 291  
 292 Nicole had not called ahead, there was no planned visit. The entire house wound tight with tension for her arrival  
 293 and during it.  
 294  
 295 She came in for less than ten minutes. Said a few things and then left.  
 296  
 297 Gave nobody any recognition. No gratitude or thank you.  
 298  
 299 Not laughing off how absurd it was to try and clean the house for her unannounced arrival.  
 300  
 301 Looking back, this moment was utter madness. Neurotic and idiotic.  
 302  
 303 Everyone had literally dropped everything they were doing to "clean the house" for her arrival when she decided to  
 304 pop at the last minute.  
 305  
 306 We should stand at attention, be ready for anything, to reorient our lives at the drop of our hat for Nicole's whims.  
 307  
 308 This.  
 309 is.  
 310 Madness.  
 311  
 312 It is like when I was young. My mother being the erratic alcoholic she was would expect the house to be clean when  
 313 she came home. My sisters and I would get off school and clean the house insensately. Agonizing over every last  
 314 detail.  
 315  
 316 Finally spotless we would sit and wait in tense silence for her to get home.  
 317  
 318 When she arrived home, it didn't matter how clean the house was, there was always something wrong.  
 319  
 320 Always.  
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 319  
 320 Always.  
 321

322 The wrong color table cloth, the  
 323 towels were folded incorrectly.  
 324 The floor was not vacuumed well  
 325 enough.  
 326 Dust on the furniture.  
 327  
 328 Narcissistic people who think they  
 are the center of the universe often  
 believe this.  
 329  
 330 Ugh  
 331  
 332 Another moment I remember with bitter  
 indignation is when Rafael described  
 to me how he was "allowed" to clean  
 333 her apartment. She liked the top of  
 her lotions smoothed so it looked new  
 every time. The foil peeled back on  
 the  
 334 wrapper for her yogurt. The bathroom  
 was spotless and everything organized  
 just so.  
 335  
 336 Her tea was to be prepared in just the  
 right way. It was the highest honor if  
 you had reached a state of such clean  
 and  
 337 pure orgasmic energy that you could  
 make Nicole's tea. Tea became a form  
 of devotion. Nicole was sensitive,  
 they  
 338 would say. On such a higher spatial  
 plane that interacting with the  
 outside world, With us plebeians would  
 set her  
 339 off.  
 340  
 341 Only certain people could drive her  
 around. She could only live in certain  
 apartments, eat certain foods cooked  
 342 certain ways because her system was so  
 tuned and sensitive. Her field is so  
 carefully cultivated.  
 343  
 344 She was so busy living and channeling  
 god in the fourth dimension and  
 guiding us all on unseen spiritual  
 planes that  
 345 she didn't have the ability to do  
 "normal" people stuff. Shop for  
 herself, organize her travel, clean  
 her apartment,  
 346 cook. Her "research" was so important  
 that she could not be disturbed with  
 our problems. Our lower level issues.  
 347  
 348 It seems crazy now and so demeaning  
 looking back on it.  
 349  
 350  
 351  
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 353

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 353

354  
355  
356 March 14th  
357 It has been almost two months since I  
left. I feel the desire to do  
something. I am not sure what but  
something. I  
358 don't know how I will do it. What they  
did was not just or right. I have no  
idea how I can stand up to it. And I  
feel  
359 terrified even thinking about it. Fear  
that they will pull me back in. That  
my life will be consumed by them when  
all  
360 I want to do is move on and heal. But  
if I do nothing then what happened to  
me and all the women before will  
361 continue. I will let myself be cowed  
by Nicole. By the fear they instill in  
you.  
362  
363 When I decided to leave I went and  
talked to Nicole, I still had hope  
that maybe she would change the  
organization.  
364 Maybe she would admit to it all and  
fix it. When I arrived at her  
apartment it was like the rose colored  
glasses had  
365 finally fallen off. All the shine was  
gone. She looked old and tired. The  
charisma and sparkle was gone. Her  
botox  
366 and plastic surgery and age very  
present. When I told her what I saw.  
How the organization had hurt me and  
367 continued to hurt others. When I told  
her it was a cult and she needed to  
fix it. She acted innocent and  
confused.  
368 Shocked even at the idea that anything  
terrible had happened. She insisted  
she had "no idea".  
369  
370 Either she is an idiot and so  
completely lost in her lack of reality  
she doesn't allow herself to see it  
and believes the  
371 means justify the ends, or she is  
deeply twisted and very sick and finds  
it perfectly ok to use, abuse,  
traumatize and  
372 destroy others lives for her own  
personal gain.  
373  
374 After that visit I realized that the  
organization had not just lost its way  
but was like that by design. Designed  
very  
375 specifically by Nicole and others to  
torture and traumatize people to gain  
things from them. Be it their bodies,  
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376 skills, or their time it was all done  
 for money and to feed nicokes  
 377 disturbed and sick ego.  
 378 I remember what Nicole said to hamza  
 that he had no obligation to his son  
 because Natalia had "trapped him on  
 the  
 379 fourth dimension". Ravis abuse. The  
 time Kenan hit Leah. The times of  
 aquesnence, sex in exchanged for  
 money,  
 380 individuals being burdened with  
 insurmountable debts to pay for  
 courses, abandoning family and  
 careers, the  
 381 physical and spiritual violence. The  
 assault and rape. I know its only a  
 matter of time before something  
 irreversible  
 382 happens. somebody is killed by their  
 partner. A child is completely  
 abandoned. Somebody commits suicide.

383  
 384 I am not sure I can go and just live  
 my life without doing anything... If  
 not me... then who will stand up? My  
 385 family and my childhood did not couw  
 me and this won't either.

386  
 387  
 388  
 389  
 390  
 391

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Albert H. Lyter III, Ph.D.  
Forensic Chemist  
7425 Capstone Dr.  
Raleigh, NC 27615  
al.lyter@inkdating.com  
919.848.3696  
December 24, 2024

Jennifer Bonjean, Esq  
303 Van Brunt Street  
Brooklyn, New York, 11231

Subject: Proposal for Forensic Analysis of Documents to determine authenticity

Dear Ms. Bonjean,

You have requested a letter outlining the necessary analysis to determine the authenticity and timeline of handwritten documents.

### **Expertise**

I have provided consultation, examination, research, and testimony in numerous high-profile cases across federal, state, and international courts over the last 40 years. My areas of specialization include ink and paper analysis, trace evidence, and questioned document examination, which are directly applicable to your inquiry.

I started my career in 1975 as a forensic chemist with the U.S. Treasury Department. I have since trained law enforcement professionals at institutions such as the FBI Academy and Federal Law Enforcement Training Center.

My qualifications extend to the analysis of materials such as ink, paper, typewriters, carbon paper, xerographic copies, and pencils, with a focus on advancing methods to answer questions about the origin and preparation of documents, specifically the timeliness of preparation.

### **Cases of Note**

- Mormon Will of the late Howard R. Hughes
- Slander trial of CBS, Sixty Minutes and Dan Rather
- Nazi war crimes case of Ivan Demjanjuk
- Sam Shephard murder trial – 2000
- Martha Stewart case



## Proposed Analysis Plan

To verify the authenticity and timeline of the document, I propose conducting the following tests:

1. **Page Count Verification:** To confirm the integrity of the notebook's pagination and identify any removed pages that might compromise its authenticity.
2. **Barcode/UPC Analysis:** To determine the years of production and availability of the notebook, which will provide a temporal reference.
3. **Electrostatic Impressions:** To identify any unsourced impressions that may reveal overwritten or removed content. This technique can uncover potentially crucial evidence not visible to the naked eye.
4. **Video Spectral Testing:** To detect any alterations or erased writings using infrared and ultraviolet light.
5. **Ink Formulation and Comparison:** To ascertain whether the ink used across entries is consistent and aligns with the purported timeline of entries.
6. **2-Phenoxyethanol (2PE) Analysis:** This critical test measures the degradation levels of 2PE in ballpoint pen ink to determine if entries were written over an extended period or simultaneously. This test is the only scientifically validated method for dating ink within a two-year range and relies on microscopic sampling of ink lines.

## Analysis Considerations

The Ink formulation and 2PE analysis involve extracting 0.05 to 0.075-millimeter samples from ink lines at 10–20 points on the document, per sample. The process is minimally invasive and does not alter the document's integrity. The resulting impact is visible only when viewed against light. As the only method capable of reliably dating ink, this test is indispensable.

## Logistics and Timeline

To perform these tests, access to the document is essential. Ideally, I would require one and a half days to conduct the initial examination on-site, with the possibility of a follow-up visit for additional testing. While laboratory conditions are preferable, I am equipped to perform these analyses in situ, should FBI protocols necessitate it. Under optimal scheduling, the full analysis can be completed within approximately 15 days from the date of initial access.

Sincerely,  
Albert H. Lyter III, Ph.D.  
Forensic Chemist

