

CAUSE NO. 141-307474-19**VICTOR MIGNOGNA****Plaintiff,****V.****FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI****Defendants.**§
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§**IN THE DISTRICT COURT****141st JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS**

**MOTION TO DETERMINE THE SCOPE OF ANTI-SLAPP STAY, OR
ALTERNATIVELY FOR LEAVE TO CONDUCT DISCOVERY**

Defendants Monica Rial and Ronald Toye (“Moving Defendants” or “Rial/Toye”) file this Motion to Determine the Scope of Anti-SLAPP Stay, or Alternatively for Leave to Conduct Discovery regarding the Motion to Dismiss Pursuant to Chapter 27 of the Texas Civil Practice and Remedies Code (the “TCPA”) (“Funimation MTD”) filed by Funimation, LLC (“Funimation”) and respectfully show the Court as follows:

I. INTRODUCTION

PLAINTIFF IS SUING MOVING DEFENDANTS FOR DEFAMATION AND OTHER TORTS RELATED TO STATEMENTS ABOUT HIS SEXUAL ASSAULT OF RIAL, AMONG OTHERS. MOVING DEFENDANTS REQUEST A 1.5 HOUR DEPOSITION OF NICK REKIETA, THE ARCHITECT OF A GoFUNDME WAR CHEST (“GFM WAR CHEST”) CREATED SPECIFICALLY TO SUE PLAINTIFF’S ENEMIES WHO ALLEGEDLY DEFAMED HIM.¹

IN FEBRUARY 2019, REKIETA, ALLEGEDLY A TOTAL STRANGER TO PLAINTIFF, SET UP THE GFM WAR CHEST AND CRYPTICALLY DESCRIBED A POTENTIAL LIST OF ENEMIES TARGETED FOR LITIGATION. CONVENIENTLY, PLAINTIFF DESTROYED HIS TEXT COMMUNICATIONS WITH REKIETA, LEAVING REKIETA AS THE SOLE HOLDER OF THEIR COMBINED ENEMIES LIST. REKIETA’S TESTIMONY AND DOCUMENTS ARE RELEVANT TO DEFENDANTS’ FORTHCOMING ANTI-SLAPP MOTION BECAUSE REKIETA IS IN SOLE POSSESSION OF DOCUMENTS AND COMMUNICATIONS DESTROYED BY PLAINTIFF, REKIETA CAN TESTIFY TO HIS MOTIVES IN CREATING THE GFM WAR CHEST, AND REKIETA CAN TESTIFY WHETHER MOVING DEFENDANTS WERE ON THE LIST OF ENEMIES BEFORE OR AFTER MULTIPLE ONLINE MAGAZINES REPORTED ON PLAINTIFF’S HISTORY OF SEXUAL MISCONDUCT.

PLAINTIFF AND REKIETA NOW INTEND TO HIDE BEHIND FUNIMATION’S MTD TO PREVENT MOVING DEFENDANTS FROM PURSUING THIS MINIMAL AMOUNT OF DISCOVERY.

IT IS AN OPEN QUESTION UNDER THE TCPA WHETHER PLAINTIFF EVEN HAS A TCPA SHIELD IN THESE CIRCUMSTANCES. FIRST, THE COURT SHOULD DETERMINE WHETHER THE TCPA STAY APPLIES UNDER THESE UNIQUE CIRCUMSTANCES. SECOND, IF THE STAY APPLIES, MOVING DEFENDANTS REQUEST LEAVE FOR THE DISCOVERY TO OCCUR.

¹ The GFM War Chest is extraordinary in that it appears to be a first of its kind. Rekieta created a campaign for Plaintiff (who is accused of sexual assault), **not for Plaintiff’s defense, but to sue his accusers in civil court**. It is apparently their confused counterpoint to <https://www.timesupnow.com/> (“The clock has run out on sexual assault, harassment and inequality in the workplace. It’s time to do something about it.”).

II. RELEVANT FACTUAL AND PROCEDURAL HISTORY

1. On February 19, 2019, Rekieta created the GFM War Chest.²
2. At the same time, Plaintiff hired Ty Beard (current lead counsel) at the direct suggestion of Rekieta.³
3. On April 18, 2019, Plaintiff deployed the GFM War Chest and sued Rial, Toye, Jamie Marchi, and Funimation, LLC (“Funimation”) (collectively, the “Defendants”) for defamation, tortious interference with existing and prospective contracts, and conspiracy for speaking out about Plaintiff.⁴

4. For example:

On February 6, 2019, Ronald tweeted that over 100 women had made accusations “of assault,” that the allegations against Vic were “corroborated,” that “[there were] mountains of testimony,” and that Funimation “have proof. That’s why they fired him.” Monica (Ronald’s fiancé) also tweeted on February 6 that “IT HAPPENED TO ME!” and that “I’m only one voice on a sea of many ... He’s hurt enough people. He’s a sick man and he needs help....” Later that day, Jamie attempted to rebuff those questioning the veracity of Monica’s post on Twitter. (*Figure 2*).

*See Pet. at ¶ 28.*⁵

5. On June 18, 2019, this Court entered an Order extending the Moving Defendants’ deadline to file a TCPA motion until July 19, 2019.

² *See* Excerpts of Deposition of Vic Mignogna (“Mignogna Depo.”), at pp. 36-39, 41 and Ex. 11. The Mignogna Depo is attached as Exhibit A and only the exhibits referenced herein are attached thereto.

³ *See* Mignogna Depo., at pp. 36-39, 43, 45, 98-99.

⁴ *See generally* Plaintiff’s Original Petition (“Pet.”).

⁵ The allegation of 100 sexual assaults was actually made on Feb. 1, 2019, in the thedaofdragonball.com/blog post titled “Fixing the Staircase: Vic Mignogna’s Sexual Assault Allegations and the Voice Actors Who Speak Out.” *See* Mignogna Depo., Ex. 5, p. 5 (“Vic Mignogna, the voice of Broly in *Dragon Ball Super*, has been accused of sexually assaulting women at anime conventions. . . . However, numerous allegations of sexual assault have shadowed Mignogna’s career and continue up to today. During the research for this article, over 100 independent allegations surfaced, dating back to 2003.”).

6. On June 26, 2019, the Moving Defendants deposed “Vic” and confirmed three critical facts:⁶

- a. Rekieta is not Plaintiff’s attorney (and accordingly there is no protected attorney-client relationship);
- b. Plaintiff destroyed his text communications with Rekieta, among others; and
- c. Plaintiff has not incurred legal fees through this lawsuit (meaning he suffers no economic harm from a 1.5 hour deposition).⁷

7. Plaintiff deposed Toye and Rial on June 27 and 28, 2019, respectively.

8. On July 1, 2019, Funimation filed its MTD.

9. On July 2, 2019, Moving Defendants requested that Mr. Beard agree to a 1.5 hour deposition of Rekieta.⁸

10. Mr. Beard refused.⁹

11. Plaintiff (unnecessarily and prematurely) filed a Motion to Quash Moving Defendants’ Notice of Intent to Subpoena Rekieta (the “Notice”), asserting that the Funimation MTD stays all discovery.¹⁰

12. Funimation has set its MTD for hearing on August 8, 2019.

III. RELEVANT FACTUAL BACKGROUND

A. Plaintiff Has a Twenty-Two Year History as an Actor.

13. Plaintiff “is a voice actor who has performed the voices of animated characters for over 22 years, mainly in “anime” productions.” Pet. at ¶ 10. He allegedly attends “approximately

⁶ Plaintiff’s legion of fans worldwide refer to him by the mononym “Vic.”

⁷ See Mignogna Depo., at pp. 33 (not his attorney); 34-35 (deleted texts); and 43, 45 (not paying attorneys).

⁸ See Plaintiff’s Motion to Quash (“MTQ”), at Ex. B thereto (not attached to this Motion).

⁹ See MTQ, at Ex. B.

¹⁰ See MTQ. The Notice is specifically subject to receipt of an Order of this Court precisely because Plaintiff refused to allow the 1.5 hour deposition of Rekieta.

35-40” fan conventions every year and derives “a sizeable income from appearance fees guaranteed by contract with the convention producers and from signing autographs, taking photos with fans, and appearing on guest panels.” Pet. at ¶ 14. Plaintiff is also an accomplished actor in front of the camera, writing, directing, and starring in an award-winning web series based on Star Trek,¹¹ and currently filming three screen projects.¹²

14. Plaintiff has over 113,000 followers on Twitter.¹³

15. Plaintiff’s power and celebrity in the anime industry is such that few people will go on the record concerning his conduct.¹⁴

B. On January 16, 2019, Plaintiff’s Long History of Alleged Sexual Harassment, Pedophilia, and Homophobia Erupt Online, Causing a Firestorm of Criticism.

16. One of Vic’s most popular characters is “Broly” from the Dragon Ball Z series. Pet. at ¶ 13. On January 16, 2019, a new Dragon Ball movie titled “Dragon Ball Super: Broly” premiered in the United States, “earning \$7 million on its first day and \$24 million within the first five days of its premier.” Pet. at ¶ 13. To date, the film has grossed over \$30,700,000 in the United States box office alone, and more than \$88,000,000 worldwide.¹⁵

17. The same day as the premiere, “someone with the Twitter handle ‘hanleia’ . . . accused Vic of being ‘a homophobic rude asshole who has been creepy to underage female fans for over ten years....’” Pet. at ¶ 15. The same user tagged Funimation with the question “**Hey @Funimation why do you employ a known pedophile,’ and a link to allegations of sexual misconduct by Mr. Mignogna at anime conventions.**” Funimation MTD, Ex. A, ¶ 5 (emphasis

¹¹ See <https://www.startrekcontinues.com/>, last visited on July 7, 2019.

¹² See <https://www.imdb.com/name/nm0586003/>, last visited on July 7, 2019.

¹³ See Mignogna Depo. at pp. 48-49.

¹⁴ See Mignogna Depo. Ex. 8 at p. 2.

¹⁵ See <https://www.imdb.com/title/tt7961060/>, last visited on July 7, 2019.

added). “The thread quickly spread with over 4,000 retweets . . . and over 400 comments, many relaying their own negative experiences, including unwanted and unsolicited physical affection from” Plaintiff.¹⁶

18. This is not at all surprising, as Plaintiff admits receiving criticism for years for kissing young girls, and acknowledges rumors of pedophilia following him well prior to January 2019.¹⁷

19. The attention from Dragon Ball Super: Broly, along with the ensuing firestorm online, in turn launched a series of online articles recounting in excruciating detail the long history of Plaintiff’s poor reputation:

- January 25, 2019, Polygon.com “Dragon Ball Super: Broly voice actor responds to sexual harassment, homophobia claims.”¹⁸
- January 30, 2019, Anime News Network, “‘Far from Perfect’: Fans Recount Unwanted Affection from Voice Actor Vic Mignogna.”¹⁹
- February 1, 2019, thedaoofdragonball.com/blog “Fixing the Staircase: Vic Mignogna’s Sexual Assault Allegations and the Voice Actors Who Speak Out.”²⁰
- February 19, 2019, Gizmodo.com “One of Anime’s Biggest Voices Accused of Sexual Harassment.”²¹

¹⁶ See Mignogna Depo., Ex. 4, p. 2.

¹⁷ See Mignogna Depo., at 159-60, 171, 205-06, 228.

¹⁸ See Mignogna Depo., Ex. 2, p. 4 (“Many conventiongoers’ stories continue to come out on social media, detailing times when the actor acted flirtatiously towards them (fondling, kissing, groping, etc.) without their consent, most while they were still underage. While these allegations are only just picking up steam, many of them go as far back as 2010. In addition to the sexual harassment claims, Mignogna’s alleged homophobic behavior remains a concern with anime fans.”).

¹⁹ See Mignogna Depo., Ex. 4, p. 1 (“A Twitter thread posted on January 16 accused *dub voice actor Vic Mignogna* of homophobia, rude behavior, and most concerning, making unwanted physical advances on female con-goers.”).

²⁰ See Mignogna Depo., Ex. 5, p. 5 (“Vic Mignogna, the voice of Broly in *Dragon Ball Super*, has been accused of sexually assaulting women at anime conventions. . . . However, numerous allegations of sexual assault have shadowed Mignogna’s career and continue up to today. During the research for this article, over 100 independent allegations surfaced, dating back to 2003.”).

²¹ See Mignogna Depo., Ex. 8 at p. 2 (“Stories about Mignogna have been circulating online for over a decade, including through the Tumblr blog Dear Vic Meggnogna, but the latest round of accusations started surfacing around mid-January of this year. io9 spoke with more than 25 voice actors, cosplayers, industry professionals, convention employees, and former fans about their experiences with Mignogna. Many of them asked not to be named in fear of retaliation from Mignogna or his fanbase. . . .”).

20. Plaintiff concedes (as he must) the foregoing articles are allegedly defamatory and damaged his reputation (collectively, the “Defamatory Articles).”²²

C. The Defamatory Articles and Twitter Firestorm Take Their Toll -- Plaintiff is Terminated by Two Major Anime Studios and Loses Multiple Conventions by February 6, 2019.

21. On February 5, 2019, anime studio Rooster Teeth publicly terminated its relationship with Plaintiff.²³

22. Between January 18, 2019 and February 6, 2019, Plaintiff lost ten (10) convention invites. *See* Pet., ¶¶ 20, 22-23, and 25-27.²⁴

23. On February 11, 2019, Funimation publicly terminated its relationship with Plaintiff.²⁵

D. Rekieta, a Complete Stranger to Plaintiff, Injects Himself into the Controversy and Raises Over \$200,000 for Plaintiff’s “Legal Defense Fees.”

24. Rekieta is a Minnesota resident who manages a channel on YouTube called “Rekieta Law.”²⁶ Rekieta describes himself as “a lawyer who lawsplains legal topics to the internet, fueled by whiskey and rage.”²⁷ On February 11, 2019, Rekieta started live-streaming about the allegations against Plaintiff.²⁸

²² *See* Mignogna Depo. at pp. 142-43, 156-157, 164, 230-31 (“**Q. You would agree with me that if you don’t sue those magazines, your reputation is still going to be damaged because you’ll never --** A. Oh, I would say my reputation has been irreparably damaged. **Q. And because of those articles, correct?** A. No, sir, because of everything. All of it. It’s a cumulative thing. Didn’t you use -- like the term you used, death by a thousand cuts, you know.”).

²³ *See* Mignogna Depo. at pp. 104, 108-09 and Ex. 6.

²⁴ *See* Ex. B (demonstrative highlighting the loss of conventions in relation to the Defamatory Articles).

²⁵ *See* Mignogna Depo. at pp. 111, 180 and Ex. 7.

²⁶ <https://www.youtube.com/channel/UCbkjX3E0IhuUfPzL0FjSPaw>, last visited on July 7, 2019.

²⁷ *Id.*

²⁸ *Id.*

25. Some time in February 2019, out of the blue, Rekieta contacted Plaintiff directly to express his support for Vic's "plight."²⁹ The exact genesis of this relationship between Plaintiff and his new fan Rekieta is unknown because Plaintiff (even after this litigation began) has a pattern and practice of deleting relevant text communications.³⁰

26. Despite having **no apparent basis** to attack the veracity of the numerous articles written about Plaintiff, Rekieta set up the GFM War Chest on February 19, 2019, for the **stated** purpose of funding lawsuits against "MANY possible defendants," including bloggers, corporations, and pseudo-anonymous keyboard warriors:³¹

This Fund is set up for Vic's legal defense fees. There are MANY possible defendants in different jurisdictions, from boring bloggers to multi-million, even multi-billion dollar corporations. It takes an agile and experienced (read: not cheap) legal team to coordinate this kind of strategy.³²

I AM NOT REPRESENTING VIC IN A LEGAL CAPACITY, but I am aware of the team who is and will coordinate this fund to pay for Vic's legal fees. Litigation costs are highly dependent on the actions of your opponents, so I'm hoping to raise enough to account for that. We will announce the disposition of any extra funds candidly and provide updates on the usage of funds to the extent that such information can be made public.

BUT IT'S TIME TO FIGHT BACK. Brigades of pseudo-anonymous keyboard warriors cannot be allowed to defame and destroy decades of goodwill on rumor and unverifiable allegation. Companies cannot rely on non-credible accusations and

²⁹ See Mignogna Depo. at 33-34. The Moving Defendants express no opinion as to the legality of Rekieta inserting himself into this dispute. In theory, as a Minnesota lawyer, Rekieta is aware of his State's prohibition on "maintenance." See *Maslowski v. Prospect Funding Partners LLC*, 890 N.W.2d 756, 763 (Minn. Ct. App. 2017) ("This court has defined maintenance, a similar concept, as '[a]ssistance in prosecuting or defending a lawsuit given to a litigant by someone who has no bona fide interest in the case; meddling in someone else's litigation.' 'The **general purpose of the law against champerty and maintenance**' is to '**prevent officious intermeddlers from stirring up strife and contention by vexatious or speculative litigation which would disturb the peace of society, lead to corrupt practices, and pervert the remedial process of the law.**' In other words, the prohibition on champerty and maintenance is aimed at discouraging 'intrusion for the purpose of mere speculation in the troubles of others.'" (internal citations omitted) (emphasis added).

³⁰ See Mignogna Depo. at 34-35, 261-62.

³¹ See Mignogna Depo. Ex. 11.

³² Interestingly, a nationwide search through PACER and a state and nationwide search through Westlaw did not reveal any lawsuits filed by Rekieta, any briefs that he drafted, or any appellate cases he worked on that would qualify him to opine on litigation costs, tactics of opponents, or the propriety of payments to a legal team. Presumably, he has been inside of a courtroom at some point since his admittance to the bar on May 8, 2015.

devastate a career for virtue points.

27. Confirming his knowledge of the “MANY possible defendants,” Rekieta also states the “people Vic has worked with, and considered friends, for many years” had defamed him.³³ Only Plaintiff could have revealed this information to Rekieta.

E. Plaintiff Contradicts His Public Statement to His 113,000 Twitter Followers — Denying Approval of the GFM War Chest.

28. Plaintiff gave contradictory testimony when questioned about the timing of Rekieta’s creation of the GFM War Chest. During his deposition, Plaintiff asserted a complete lack of awareness of the specifics of the GFM War Chest and foisted its purpose and creation entirely onto Rekieta.³⁴ This directly conflicts with Plaintiff’s first promotion of the GFM War Chest in his February 20, 2019 tweet to his 113,000 plus twitter followers:

February 20, 2019 Tweet	June 26, 2019 Deposition Testimony
A friend [Rekieta] expressed a desire to set up a GoFundMe for legal expenses. <u>I approved his kind offer and am so grateful</u> , but I am not managing it, nor will I personally receive any of it. Any surplus will go to the Salvation Army Domestic Violence and Abuse Shelters. (emphasis added) ³⁵	<p>Q. Who came up with the idea of the GoFundMe campaign?</p> <p>A. Mr. Rekieta.</p> <p>Q. And what was the purpose of the GoFundMe campaign?</p> <p>A. You’ll have to ask Mr. Rekieta.</p> <p>...</p> <p>Q. And you told him that was okay with you?</p> <p>A. No. I did not give him permission. He had already done it.</p> <p>Q. Okay. Did you -- did he ask for permission after he did it?</p> <p>A. No sir.</p> <p>...</p> <p>Q. Did you ever bless him doing that?</p> <p>A. No.³⁶</p>

³³ See Mignogna Depo. Ex. 11.

³⁴ See Mignogna Depo. at pp. 33-34, 36-37, 41, 46-47.

³⁵ See Mignogna Depo Ex. 17. Apparently, Vic did not select the Salvation Army as the recipient of any unspent SLAPP funds, nor has he ever donated to this certainly worthy cause. See Mignogna Depo. at pp. 57-58. Presumably, Rekieta, recognizing the distasteful nature of the GFM War Chest, sought to create this disingenuous cover for the use of the money.

³⁶ See Mignogna Depo. at 38.

	<p>...</p> <p>Q. I'm wondering if you approved him doing that.</p> <p>A. Well, I guess what I mean to say is if -- he didn't ask me if it was okay if he did it. He just went ahead and did it, and let me know that he was doing it.³⁷</p>
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29. Oddly, Plaintiff claims he has no clue how the almost \$200,000 raised (now over \$206,000 at time of filing) through the GFM War Chest is being spent.³⁸ Plaintiff also states that he has not paid attention to the progress of the GFM War Chest and does not trouble himself to look at the webpage to see who has donated.³⁹

30. Contrary to Rekieta's promotion on the GFM War Chest page:

- the money **is not** being spent to sue the "MANY" possible Defendants Rekieta allegedly knows;
- the money **is not** being spent for "legal defense;"
- the money **is not** being spent to sue bloggers; and
- the money **is not** being spent to sue pseudo anonymous keyboard warriors.

31. Nor is the GFM War Chest being spent to sue the authors of the Defamatory Articles. Rather, the GFM War Chest is used as a battering ram against three people with the audacity to speak out against Mr. Mignogna, and Funimation who terminated their independent

³⁷ See Mignogna Depo. at 47.

³⁸ See Mignogna Depo. at p. 41 (Q. Have you ever seen the GoFundMe page? A. No, sir."); *see id* at p. 39 ("Q. Does it strike you as odd that there's someone out there raising money in your name and you can't tell me how that money is being spent? A. No, sir. Q. Do you feel no responsibility to make sure -- A. No, sir. . . . So you feel no responsibility to the -- tens or thousands of people that are putting money into this GoFundMe campaign to make sure you know how the money is being spent? . . Q. (BY MR. LEMOINE) Are you -- you struggling with that question? A. No, sir."); *see id* at p. 42 ("If Mr. Rekieta is a con artist and he is just taking money and doing whatever with it that is coming from your fans, not your problem? . . . A. I have nothing to do with it. Q. (BY MR. LEMOINE) Okay. So not your problem, right? A. Correct.").

³⁹ See Mignogna Depo. at pp. 32-33, 38, 41, and 43.

contractor relationship **after** all but one of the Defamatory Articles were released.⁴⁰

32. If the Court gives any credence to Plaintiff's sworn testimony, Rekieta created the GFM War Chest and identified numerous targets for litigation, all without Plaintiff's approval, only to notify him after starting the campaign.⁴¹ Accordingly, in order to learn about Rekieta's enemies list and who was defaming Plaintiff (and whether Defendants were even included in Rekieta's initial target list), Moving Defendants seek to depose Rekieta.⁴²

IV. ARGUMENT AND AUTHORITIES CONCERNING SCOPE OF TCPA STAY

33. It is an unanswered question under the TCPA as to whether the Funimation MTD suspends all discovery as to claims that are not addressed therein (i.e. the claims against Moving Defendants).

34. Starting with the plain language, the TCPA suspension applies only to discovery concerning the defined term "legal action."

"Except as provided by Section 27.006(b), on the filing of a motion under this section, all discovery **in the legal action** is suspended until the court has ruled on the motion to dismiss."⁴³

⁴⁰ See Mignogna Depo. at pp. 51-52 ("My first question is, so the money in -- according to the GoFundMe page, is for your defenses, correct? A. That's my understanding. Q. Are you being sued by anybody right now? A. No, sir. Q. **So what is the money defending against? A. That seems like a semantic to me. I think we both know what it's for. It's -- it's -- Q. Oh, yes, we do.** A. It's for the lawsuit itself. Q. That's right, it's for you to sue two women that have accused you of sexual harassment -- . . . A. No, sir." . . . Q. Are you aware of any other GoFundMe campaign in the entire United States where a man accused of sexual harassment gets money to go sue his accusers? A. No, sir.") (emphasis added).

⁴¹ The timing of Rekieta's launch of the GFM War Chest and the hiring of Mr. Beard also deserves some inquiry, as does Mr. Beard's regular appearances on Rekieta's YouTube channel.

⁴² See Mignogna Depo. at pp. 36-37, 46-47.

⁴³ TEX. CIV. PRAC. & REM. CODE § 27.003(c) (emphasis added).

“Legal action” is defined so that a TCPA “Motion to Dismiss” can apply broadly to the entire lawsuit or as narrowly as to a specific cause of action.⁴⁴ That the scope of the suspension is variable is supported by the exception for limited discovery which is “relevant to the motion.”⁴⁵

35. While no court has addressed the issue, the suspension does not logically apply to claims that are not the subject of a motion to dismiss. If the legislature intended to stay all discovery in the entire proceeding it (a) would have used a different term (such as “proceeding” or “lawsuit”); and (b) would have used language similar to that found in Texas Civil Practices & Remedies Code § 51.014(b).⁴⁶

36. Here, the Funimation MTD does not address any claims against Moving Defendants, and it is an absurd interpretation to argue that discovery concerning claims not subject to the Funimation MTD should be stayed.⁴⁷

37. Plaintiff’s ironic use of the Funimation MTD as a shield (a shield designed for Funimation, not Plaintiff) should be rejected and Rekieta’s deposition allowed.

⁴⁴ TEX. CIV. PRAC. & REM. CODE § 27.001(6) (“Legal action” means a lawsuit, **cause of action**, petition, complaint, cross-claim, or counterclaim or any other judicial pleading or filing that requests legal or equitable relief.”) (emphasis added).

⁴⁵ TEX. CIV. PRAC. & REM. CODE § 27.006(b) (“On a motion by a party or on the court’s own motion and on a showing of good cause, the court **may allow specified and limited discovery relevant to the motion**.”) (emphasis added).

⁴⁶ (“An interlocutory appeal under Subsection . . . (12) [TCPA] also **stays all other proceedings** in the trial court pending resolution of that appeal.”) (emphasis added).

⁴⁷ This interpretation is also consistent with the stated purpose of the statute which would have no relevance to a claim not subject to a TCPA Motion to Dismiss. *See* TEX. CIV. PRAC. & REM. CODE § 27.002 (“PURPOSE. The purpose of this chapter is to encourage and safeguard the constitutional rights of persons to petition, speak freely, associate freely, and otherwise participate in government to the maximum extent permitted by law and, **at the same time, protect the rights of a person to file meritorious lawsuits for demonstrable injury**.”) (emphasis added).

V.
ARGUMENT AND AUTHORITIES
CONCERNING MOTION FOR LEAVE UNDER TCPA

A. The Good Cause Standard for Discovery Under the TCPA.

38. The TCPA provides for an evidence-based framework to decide challenged claims.⁴⁸ Thus, the TCPA allows for “specified and limited discovery relevant to the motion” upon “a showing of good cause.”⁴⁹ The term “good cause” is undefined, and the Moving Defendants have not located a case interpreting that phrase as used by the TCPA in the context of a §27.006(a) analysis.⁵⁰ Using Black’s Law Dictionary, the phrase “good cause”—when it appears undefined in a state statute—has been interpreted as “something akin to legitimate or substantial reason, as opposed to arbitrariness.” *See Barton-Rye v. State*, No. 07-16-00096-CR, 2016 WL 4678963, at *1 (Tex. App.—Amarillo Sept. 1, 2016, pet. ref’d) (mem. op.) (not designated for publication).

B. Good Cause Exists to Allow a Short Deposition of Rekieta.

39. Plaintiff cannot tie any of the ten (10) canceled conventions (identified in the Petition) as caused by any Defendants.⁵¹ Those conventions were all cancelled by Feb. 6, 2019, a full week before Rekieta set up the GFM War Chest.⁵² Who and what caused Plaintiff’s damages,

⁴⁸ *See* TEX CIV. PRAC. & REM. CODE §§ 27.005 (b)-(d). The TCPA includes a three step process where (i) first, the movant has the burden to show “by a preponderance of the evidence” that the challenged claims are protected under the TCPA; (ii) if so, then Court must dismiss the challenged claims unless the non-movant “establishes a prima facie case” for each element of the claim(s) in question; but (iii) if the movant can then establish each element of a valid defense “by a preponderance of the evidence” the claims must be dismissed. TEX CIV. PRAC. & REM. CODE §§ 27.005 (b)-(d).

⁴⁹ TEX CIV. PRAC. & REM. CODE §§ 27.006(a).

⁵⁰ The Austin Court of Appeals has examined “good cause” in the context of §27.003(b) and 27.004(b) as being established by showing that the failure involved was an “accident or mistake, not intentional or the result of conscious indifference.” *Morin v. Law Office of Kleinhans Gruber, PLLC*, 03-15-00174-CV, 2015 WL 4999045, at *3 (Tex. App.—Austin Aug. 21, 2015, no pet.) (mem. op.) and *Campane v. Kline*, 03-16-00854-CV, 2018 WL 3652231, at *6 (Tex. App.—Austin Aug. 2, 2018, no pet. h.). Applying the Austin Court of Appeals “conscious indifference definition,” to determine why a party failed to (a) timely file a motion to dismiss (§27.003(b)); or (b) timely obtain a hearing for the motion to dismiss (§ 27.004(a)) makes sense in those context because the movant must show why they failed to timely act under the TCPA. By contrast, such standard does not make sense to a request for leave to conduct discovery because a non-movant is not asking for relief from its failure to take some action.

⁵¹ *See* Mignogna Depo. at pp. 101-04, 172-73, 225, 280-82.

⁵² *Compare* Pet. ¶¶ 20, 22-23, 25-27 with Ex. B (demonstrative showing all conventions cancelled prior to GFM War

something Rekieta identified himself as having knowledge of (obviously based on conversations with Vic) are relevant to Plaintiff's causation element.

As to the cause-in-fact component of proximate cause, a defendant's action is the cause in fact of an injury if it was "a substantial factor in causing the injury and without which the injury would not have occurred." **Grandfather's statement to DFPS was but a small part in the plethora of negative accusations against him by Mother and Bruno, most of which concerned false sexual-abuse allegations against his sons. Indeed, as the trial court found, Mother's defamation and wrongful detention of Mike was "the primary and root cause of damages awarded in this judgment." Father linked none of his damages to Grandfather's specific statements,** instead focusing on factors such as the potential grand jury indictment and loss of custody of the boys from Mother's and Bruno's false allegations. Based on Father's testimony about what caused his damages and the overwhelming amount of other circumstances impacting Father's reputation and mental state, **we conclude Grandfather's statements were not a substantial factor in causing Father's injuries.**

Bos v. Smith, 556 S.W.3d 293, 307–08 (Tex. 2018) (emphasis added). Moreover, on July 4, 2019, Rekieta dedicated his YouTube show to increasing the GFM War Chest.⁵³ One of Rekieta's guests disclosed that more money was needed to sue an individual described as "Mars girl" in order to put a lien on her vehicle.⁵⁴

"it's important that everyone know is that we need enough money in there so that we can finish these cases and then sue Mars girl if you want Mars girl gets sued we need enough money to beat Funimation and Soye and MoRonica so then we can sue Mars girl cuz he's not gonna get any money from Mars girl, the point is to just sue Mars girl and put a lien on her on her 1980s Volkswagen . . ."⁵⁵

Clearly, Rekieta's enemies list, and who may have harmed Plaintiff, is broader than just this one person.

40. Finally, Plaintiff will suffer no harm from this deposition moving forward because he is not paying attorneys' fees because they are being covered by the GFM War Chest.

Chest creation).

⁵³ See Declaration of J. Sean Lemoine ("Lemoine Dec."), ¶¶ 12-14, attached as Exhibit C.

⁵⁴ See *id.* at ¶ 13.

⁵⁵ See *id.*

C. The Court Should Impose Certain Restrictions on the Deposition to Ensure Rekieta's Compliance.

41. Moving Defendants request the option to conduct the deposition via teleconference deposition (in order to save costs) and for the deposition to take place at a courthouse in Minnesota so that a local judge may be on hand. Typically, such procedure is not required for a non-party deponent; however, given Rekieta's statements below, the Moving Defendants request that Rekieta's deposition occur in a judicial setting to ensure compliance with proper decorum and responsiveness.

42. Rekieta's recent (July 3, 2019) live-stream evidences this concern (the "July 3 Stream").⁵⁶ The July 3 Stream focused on Moving Defendants' request for Rekieta's deposition, and Plaintiff's hastily filed MTQ. During the July 3 Stream, Rekieta:

- referred to Mr. Lemoine (the undersigned) as a "smug piece of trash;"
- announced that he was already unavailable for a deposition on August 2, 2019 (and noted it would be difficult for him to be deposed because he has children);
- stated he would openly oppose his deposition;
- self-declared any information he might have as irrelevant;
- directed Mr. Lemoine to "earn it bitch" in response to obtaining his deposition;
- noted that he had no interest in complying because "all of you [presumably Mr. Lemoine and co-counsel] are scum;" and
- noted that he would make Mr. Lemoine "earn the right to do this deposition."⁵⁷

43. Such commentary from Rekieta is consistent with his animosity towards potential witnesses in this case, is inconsistent with portions of the Minnesota Rules of Professional

⁵⁶ <https://www.youtube.com/watch?v=-ZeKhCntC8o&t=9396s>, last visited July 7, 2019.

⁵⁷ See Lemoine Dec., ¶¶ 7-9.

Conduct, and belies his disclaimer of knowledge relevant to this case.⁵⁸

VI. CONCLUSION AND PRAYER

For these reasons, the Moving Defendants respectfully request the Court grant an Order as follows:

- 1) the discovery is not stayed by Funimation, LLC's Motion to Dismiss, and Moving Defendants may issue a subpoena for the deposition of Nick Rekieta for 1.5 hours (along with document requests); or
- 2) Alternatively, allow the deposition to occur pursuant to Texas Civil Practice & Remedies Code §27.006(b);
- 3) That such deposition occur via livestream (at the option of the Moving Defendants) and at a courthouse located near the deponent in accordance with applicable Minnesota rules of procedure; and
- 4) Award Moving Defendants such other and further relief to which they may be justly entitled.

⁵⁸ See Lemoine Dec., ¶ 5-6 (noting Rekieta's support for disclosing names and workplaces of any witnesses whose identity is "discerned by the Court"); Minnesota Rules of Professional Conduct (Preamble: at 1, 5-7, 10, 12-13).

Dated: July 9, 2019.

Respectfully submitted,

/s/ J. Sean Lemoine

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CERTIFICATE OF CONFERENCE

I certify that I attempted to confer with counsel for Plaintiff, and Plaintiff is opposed to the relief sought, necessitating the filing of this motion.

/s/J. Sean Lemoine

J. Sean Lemoine

CERTIFICATE OF SERVICE

I certify that on July 9, 2019, a true and correct copy of the foregoing was served on all counsel of record in accordance with Rule 21a of the Texas Rules of Civil Procedure.

/s/J. Sean Lemoine
J. Sean Lemoine

EXHIBIT A

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

1

NO. 141-307474-19

VICTOR MIGNOGNA,) IN THE DISTRICT COURT

)

Plaintiff,)

)

VS.) TARRANT COUNTY, TEXAS

)

FUNIMATION PRODUCTIONS,)

LLC, JAMIE MARCHI, MONICA)

RIAL, and RONALD TOYE,)

)

Defendants.) 141st JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF

VICTOR MIGNOGNA

JUNE 26, 2019

ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MIGNOGNA,

produced as a witness at the instance of the DEFENDANTS,

and duly sworn, was taken in the above-styled and

numbered cause on June 26, 2019, from 10:05 a.m. to 5:39

p.m., before Claudia White, CSR in and for the State of

Texas, reported by machine shorthand, at the 141st

Judicial District Court, 100 North Calhoun Street, 1st

Floor, Fort Worth, Texas, pursuant to the Texas Rules of

Civil Procedure and the provisions stated on the record

or attached hereto.

Job No. 132281

3

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ALSO PRESENT: (Appearing via Zoom)

Ms. Jamie Marchi

Mr. Ronald Toye

Ms. Monica Rial

2

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June 26, 2019

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<div>REQUESTED DOCUMENTS/INFORMATION</div> <div>NO. DESCRIPTION PAGE</div> <div>NONE</div> <div>CERTIFIED QUESTIONS</div> <div>NO. PAGE/LINE</div> <div>NONE</div> <div>*XXXX identifies redacted names in the transcript per confidentiality stipulation</div>	<div>MR. BEARD: Okay. Counsel has agreed that</div> <div>the only people that will be watching this live stream</div> <div>are the parties and counsel, and that it will not be</div> <div>recorded or otherwise distributed without agreement of</div> <div>all the parties.</div> <div>MR. ERICK: That's agreed.</div> <div>MR. LEMOINE: That's correct.</div> <div>MR. JOHNSON: That's agreed.</div> <div>MR. LEMOINE: One other -- one other thing.</div> <div>This lady sitting in the black with the gray sweater</div> <div>hasn't introduced herself, has she?</div> <div>MR. BEARD: No. She's Lisa Hansell, she's</div> <div>our witness consultant.</div> <div>MR. LEMOINE: Okay. She's a jury</div> <div>consultant of some sort?</div> <div>MR. BEARD: Witness, but, yeah, my -- my</div> <div>office.</div> <div>MR. LEMOINE: All right. One other</div> <div>agreement, can we have an agreement that objection for</div> <div>one of the Defendants is an objection for all, so we</div> <div>don't jump all over each other?</div> <div>MR. JOHNSON: Agreed.</div> <div>MR. LEMOINE: All right. And I don't know</div> <div>if everybody wants to do consecutive deposition</div> <div>numbering so that it would be throughout the</div>
6	8
<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>THE VIDEOGRAPHER: And we're going on the</div> <div>record in the videotaped deposition of Mr. Victor</div> <div>Mignogna. Today's date is June 26th, 2019. The time is</div> <div>10:05 a.m.</div> <div>At this time, will counsel please state</div> <div>their appearances for the record, and then the court</div> <div>reporter will swear in the witness.</div> <div>MR. BEARD: Ty Beard for the Plaintiff.</div> <div>MR. ERICK: Casey Erick for Defendants</div> <div>Monica Rial, Ron Toye.</div> <div>MR. LEMOINE: Sean Lemoine for the</div> <div>Defendants Monica Rial and Ron -- Ron Toye.</div> <div>MR. VOLNEY: John Volney for Funimation.</div> <div>MR. JOHNSON: Sam Johnson for Jamie Marchi.</div> <div>MR. BEARD: Go ahead and announce.</div> <div>MS. CHRISTIE: Carey Christie for Vic</div> <div>Mignogna.</div> <div>MR. LEMOINE: And then we have appearing by</div> <div>Zoom, which is a teleconference, we have Ethan Minshull</div> <div>from Wick Phillips and Andrea Perez from Kessler</div> <div>Collins. And, also, Ms. Marchi and Mr. Toye, and I</div> <div>think Ms. Rial, are joining by Zoom.</div> <div>And do you want to do the --</div> <div>MR. BEARD: Yeah. We're on the record?</div> <div>MR. LEMOINE: Yeah.</div>	<div>depositions, since I suspect there will be a large</div> <div>number of them, but, Mr. Beard, that's up to you.</div> <div>MR. BEARD: In other words, one objection</div> <div>that you guys -- that one person makes is deemed to</div> <div>be --</div> <div>MR. LEMOINE: Oh, I'm -- I'm sorry.</div> <div>MR. BEARD: -- made for all?</div> <div>MR. LEMOINE: That -- that's an agreement</div> <div>for the Defendants, that way we don't have to keep</div> <div>objecting.</div> <div>MR. BEARD: I was wondering what I was</div> <div>involved in.</div> <div>MR. LEMOINE: The agreement, what I was</div> <div>asking everybody at the table, because I can't dictate</div> <div>this, is consecutive deposition numbering, meaning we</div> <div>start today at 1, and if we go to 42, and then tomorrow</div> <div>there's a new deposition, 1 through 42 stays set, you'll</div> <div>have them, you can use the 1 through 42, and then any</div> <div>new depositions would start at 43. That way, when you</div> <div>go to trial and you're playing deposition testimony, the</div> <div>42nd deposition exhibit is the same in every deposition.</div> <div>Does that make sense?</div> <div>MR. BEARD: No. But --</div> <div>MR. JOHNSON: If I may jump in, he means</div> <div>consecutive exhibit numbering.</div>

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

9	<p>1 MR. BEARD: Oh, sure, yeah, that's fine.</p> <p>2 MR. LEMOINE: What am I saying?</p> <p>3 MR. JOHNSON: You're saying consecutive</p> <p>4 deposition --</p> <p>5 MS. CHRISTIE: Deposition.</p> <p>6 MR. JOHNSON: -- numbering.</p> <p>7 MR. BEARD: Yeah.</p> <p>8 MR. LEMOINE: I got it.</p> <p>9 MR. BEARD: Yeah, that's fine.</p> <p>10 MR. LEMOINE: Okay. Any -- anything else</p> <p>11 we need to discuss? Read and sign, I assume?</p> <p>12 MR. BEARD: No.</p> <p>13 MR. LEMOINE: Okay.</p> <p>14 THE REPORTER: You don't want to read and</p> <p>15 sign?</p> <p>16 MR. BEARD: Oh, I'm sorry. Help me out</p> <p>17 here.</p> <p>18 MR. LEMOINE: Do you want Mr. -- is it</p> <p>19 Mignogna?</p> <p>20 THE WITNESS: Mignogna, yes, sir.</p> <p>21 MR. LEMOINE: Very good. Mr. Mignogna to</p> <p>22 read his deposition and sign it when it's over?</p> <p>23 MR. BEARD: Oh, yeah.</p> <p>24 MR. LEMOINE: Okay.</p> <p>25 MR. BEARD: Absolutely. I'm sorry, I was</p>
10	<p>1 --</p> <p>2 MR. LEMOINE: Yeah, I thought that's --</p> <p>3 MR. BEARD: I was -- I was a thousand miles</p> <p>4 away.</p> <p>5 MR. LEMOINE: That's what I thought. All</p> <p>6 right. Are we otherwise ready?</p> <p>7 (Oath administered.)</p> <p>8 THE REPORTER: This will be taken under the</p> <p>9 Texas Rules of Civil Procedure?</p> <p>10 VICTOR MIGNOGNA,</p> <p>11 having been first duly sworn, testified as follows:</p> <p>12 DIRECT EXAMINATION</p> <p>13 BY MR. LEMOINE:</p> <p>14 Q. Would you state your name for the record.</p> <p>15 A. Victor Joseph Mignogna.</p> <p>16 Q. Mr. Mignogna, would you identify the woman with</p> <p>17 the black shawl and gray shirt. Who is she?</p> <p>18 A. Her name is Lisa Hansell.</p> <p>19 Q. And what does she do for a living?</p> <p>20 A. For a living?</p> <p>21 Q. Yeah. Do you know?</p> <p>22 A. She does several things, but among other</p> <p>23 things, she does makeup work and production work.</p> <p>24 Q. And when you say makeup work and production</p> <p>25 work, is that in some kind of --</p>
11	<p>1 A. For film and television.</p> <p>2 Q. Okay. Is she -- to your knowledge, has she</p> <p>3 ever been a witness consultant?</p> <p>4 A. I don't know anything about --</p> <p>5 Q. As you sit here today, is she -- do you -- have</p> <p>6 you hired her to be your witness consultant?</p> <p>7 A. I have not hired her.</p> <p>8 MR. LEMOINE: Okay. Then I'm going to ask</p> <p>9 that Ms. Hansell be excluded from the deposition.</p> <p>10 MR. BEARD: Counsel, I hired her. But</p> <p>11 that's fine, she can be excluded.</p> <p>12 MR. LEMOINE: Okay.</p> <p>13 (Ms. Hansell exits.)</p> <p>14 Q. (BY MR. LEMOINE) Have you ever been deposed</p> <p>15 before, Mr. Mignogna?</p> <p>16 A. No, sir.</p> <p>17 Q. Have you ever had to give testimony in any</p> <p>18 capacity before?</p> <p>19 A. Yes, sir.</p> <p>20 Q. In what capacity?</p> <p>21 A. I was a police officer for a time, and in my</p> <p>22 job capacity, I -- I would have to testify against</p> <p>23 defendants that I arrested and give testimony.</p> <p>24 Q. And when were you a police officer?</p> <p>25 A. A long time ago. Roughly '86, '87, in</p>
12	<p>1 Maryland.</p> <p>2 Q. And how long were you a police -- and how long</p> <p>3 were you a police officer, a year?</p> <p>4 A. Roughly two years, on and off.</p> <p>5 Q. And when you -- when you say on and off, were</p> <p>6 you some kind of auxiliary police officer?</p> <p>7 A. Well, no, I -- well, I was a -- I was a</p> <p>8 seasonal officer, went through a -- the -- the necessary</p> <p>9 degree of training and sworn in, powers of arrest, etc.</p> <p>10 Q. Were you allowed to carry a pistol?</p> <p>11 A. Yes, sir. And -- I'm sorry.</p> <p>12 Q. Go ahead.</p> <p>13 A. And then at some point they realized that I had</p> <p>14 a background in film and television and they asked me to</p> <p>15 -- to start making PSAs and commercials for</p> <p>16 pedestrian-related, citizen-related videos to help</p> <p>17 educate the -- the -- the public. That's why I meant on</p> <p>18 and off. I -- I started doing the video stuff toward</p> <p>19 the end.</p> <p>20 Q. When did you stop being a police officer?</p> <p>21 A. It was just a couple of years, so, I guess, you</p> <p>22 know, roughly -- again, I -- I don't remember the years,</p> <p>23 specifically, but a couple of years.</p> <p>24 Q. And why did you cease being a police officer?</p> <p>25 A. It was never a career move, it was a -- it was</p>

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

13

1 something that I thought would be interesting to do
2 right out of college. I mean, it wasn't something I
3 intended to do for a long period of time.

4 Q. Were you terminated or did you voluntarily
5 quit?

6 A. No, I voluntarily quit.

7 Q. Apart from your attorneys, have you talked to
8 anybody in preparation for this deposition?

9 A. No.

10 Q. What have you done to prepare for this
11 deposition?

12 A. Just spoken with my attorneys and prepared.

13 Q. Did you review any documents to refresh your
14 recollection about any events that you might be
15 discussing today?

16 A. No, sir.

17 Q. Are there any medications that you're on that
18 would prevent you from testifying truthfully?

19 A. No, sir.

20 Q. Is there anything that you can think of that
21 would prevent you from testifying truthfully today?

22 A. No, sir.

23 Q. What's your full name?

24 A. Victor Joseph Mignogna.

25 Q. How old are you?

14

1 A. Fifty-six.

2 Q. Do you ever go by any nicknames?

3 A. Vic.

4 Q. Is that it?

5 A. Yes.

6 Q. What about the Fuhrer, ever be -- ever go by
7 the nickname the Fuhrer?

8 A. No.

9 Q. Have any --

10 MR. BEARD: Excuse me --

11 Q. (BY MR. LEMOINE) Are you aware of --

12 MR. BEARD: -- Counsel, could you say that
13 louder?

14 MR. LEMOINE: The Fuhrer.

15 MR. BEARD: The Fuhrer?

16 MR. LEMOINE: Yeah.

17 MR. BEARD: As in Adolph Hitler?

18 MR. LEMOINE: I don't know.

19 MR. BEARD: Is that how it's spelled?

20 MR. LEMOINE: Yes.

21 MR. BEARD: Okay. Sorry.

22 Q. (BY MR. LEMOINE) Are you aware of there being
23 any group of people out there in -- in -- in the world
24 that refer to you as the Fuhrer?

25 A. Yes.

15

1 Q. And who refers you -- as you to the Fuhrer?

2 A. Many years ago, members of my fan club, the
3 Risembool Rangers, thought that it would just be fun,
4 since it was kind of a nickname of the fan club, that
5 they were kind of Risembool -- that they were Rangers,
6 and somebody made it up as a joke. I had nothing to do
7 with it. It was short-lived. I didn't make it up, I
8 didn't condone it, it was just a -- something some fan
9 made up.

10 Q. Do you know if your mother ever referred to you
11 as the Fuhrer?

12 A. Not to my knowledge.

13 Q. And when you say short-lived, short-lived like
14 how long, few days, few weeks?

15 A. I don't even know. I haven't heard that
16 reference in a very long time until you just said it.

17 Q. I take it that when the -- the Risembool
18 Rangers started referring to you as the Fuhrer, you --
19 you understood the inappropriateness of something like
20 that, correct?

21 A. I didn't really have any feeling about it.

22 Q. Well, can you associate for me any other human
23 being that's been called the Fuhrer besides Adolph
24 Hitler?

25 A. Not to my knowledge.

16

1 Q. All right. And so you would agree with me that
2 it would be inappropriate for you to have a nickname or
3 condone a nickname like the Fuhrer?

4 A. I never condoned it.

5 Q. Okay. And you would agree with me that would
6 be in -- inappropriate for people to call you that, but
7 you don't support that kind of nonsense, do you?

8 A. I don't fully understand.

9 Q. Sure.

10 A. Can you rephrase?

11 Q. If somebody called me the Fuhrer, I would tell
12 them to stop immediately, because it's anti-Semitic and
13 refers to a time in our history where terrible things
14 were done to Jewish people. Do you -- do you have that
15 same feeling?

16 A. Of course I do.

17 Q. Okay. So you would agree with me that if there
18 were people out there calling you the Fuhrer, one of the
19 things you would do would be to intervene to stop that?

20 A. I knew that they were fans who meant nothing by
21 it. They're young people. And I didn't address it one
22 way or the other, and it died off.

23 MR. LEMOINE: All right. I'll object as
24 nonresponsive.

25 Q. (BY MR. LEMOINE) My question was not what you

DEPOSITION OF VICTOR MIGNOGNA
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17	19
<p>1 think the fans might believe, but if you agree, they</p> <p>2 would be --</p> <p>3 A. I believe you asked me if they would -- if I</p> <p>4 told them to stop, and I said no. And my answer to that</p> <p>5 is, no, because they were fans and I knew they didn't</p> <p>6 mean anything by it. Their intentions were nothing more</p> <p>7 than playful, and so I didn't address it and it died</p> <p>8 off.</p> <p>9 Q. Does the Risembool Rangers, do they have a</p> <p>10 definitions page somewhere?</p> <p>11 A. I don't know.</p> <p>12 Q. That's not something you have anything to do</p> <p>13 with?</p> <p>14 A. No, sir.</p> <p>15 Q. Is there any adult that monitors this --</p> <p>16 A. Yes.</p> <p>17 Q. -- Risembool Rangers page?</p> <p>18 A. Sorry. Sorry. Not supposed to overlap. I</p> <p>19 apologize.</p> <p>20 Yes.</p> <p>21 Q. And who's that adult?</p> <p>22 A. I don't -- I don't specifically know all their</p> <p>23 names, but we have moderators. We've always had</p> <p>24 moderators of legal age to make sure that any of the,</p> <p>25 like, forums and -- and places where the fans would</p>	<p>1 A. I don't know her birthday.</p> <p>2 Q. How do you know she's of age?</p> <p>3 A. Because she's clearly of age.</p> <p>4 Q. All right. How many hours does miss --</p> <p>5 A. She's out of college, she has a job, she's</p> <p>6 clearly of age.</p> <p>7 Q. How much time does she devote to the --</p> <p>8 A. I have no idea, sir.</p> <p>9 Q. -- moderator?</p> <p>10 A. I'm sorry.</p> <p>11 Q. Where do you currently live?</p> <p>12 A. Grapevine, Texas.</p> <p>13 Q. And how long have you lived in Grapevine?</p> <p>14 A. Since late December of last year.</p> <p>15 Q. And where did you live prior to that?</p> <p>16 A. I went back and forth between Los Angeles and</p> <p>17 Houston.</p> <p>18 Q. Are you married?</p> <p>19 A. No, sir.</p> <p>20 Q. Have you ever been married?</p> <p>21 A. Yes, sir.</p> <p>22 Q. How long were you married?</p> <p>23 A. Six -- a little over six years.</p> <p>24 Q. From when to when?</p> <p>25 A. '95 to 2000, mid 2000.</p>
18	20
<p>1 gather to chat, were safe places where -- where there</p> <p>2 wasn't any inappropriate discussions or challenges or</p> <p>3 bullying.</p> <p>4 Q. Okay. And so do you know who any of these</p> <p>5 moderators are?</p> <p>6 A. I know some -- they've changed over the years,</p> <p>7 because, again, they're volunteers, they're fans who</p> <p>8 just offered to help.</p> <p>9 Q. And who screens them to make sure they're of</p> <p>10 legal age?</p> <p>11 A. I'm sorry?</p> <p>12 Q. Who screens them to make sure they're of legal</p> <p>13 age?</p> <p>14 A. The other moderators who are of legal age.</p> <p>15 Q. Who screens that moderator?</p> <p>16 A. I'm sure at some point in time I -- I probably</p> <p>17 had spoken to someone who I knew was of legal age.</p> <p>18 Q. As you sit here today, can you identify one</p> <p>19 person?</p> <p>20 A. I'm sorry?</p> <p>21 Q. As you sit here today, can you identify one</p> <p>22 person who is of legal age that is a moderator on the</p> <p>23 Risembool Rangers page?</p> <p>24 A. Alyssa Fluty.</p> <p>25 Q. And how old is she?</p>	<p>1 Q. Do you have any children?</p> <p>2 A. No, sir.</p> <p>3 Q. What's the highest level of formal education</p> <p>4 you've ever obtained?</p> <p>5 A. I have a bachelor's degree in science.</p> <p>6 Q. Where did you get that?</p> <p>7 A. Arts and science. From Liberty University.</p> <p>8 Q. In Virginia?</p> <p>9 A. Yes, sir.</p> <p>10 Q. When did you graduate?</p> <p>11 A. '86.</p> <p>12 Q. And after you left Liberty, that's when you</p> <p>13 became a police officer in Maryland?</p> <p>14 And I know it's been a long time, so I'm</p> <p>15 not trying to --</p> <p>16 A. I know. So sorry.</p> <p>17 Q. I'm not trying to trap you on dates.</p> <p>18 A. No, I -- I -- I know, I'm just trying to work</p> <p>19 it out. When I said on and off, if I may, I guess, if I</p> <p>20 --</p> <p>21 Q. Sure. Go ahead.</p> <p>22 A. -- may clarify.</p> <p>23 As I mentioned, I was a seasonal officer.</p> <p>24 There are cities in Maryland that are vacation towns and</p> <p>25 they hire additional officers for -- for the -- for the</p>

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1 seasons. And my senior year in college, I was hired.
2 And then I went back to college so I wasn't there any
3 more. And then after college, I went back and did it
4 for another year and a half or so. That's what I meant
5 by on and off.
6 Q. Okay. Did you teach at a school after you
7 graduated Liberty University?
8 A. Yes, sir.
9 Q. What school did you teach at?
10 A. Trinity Christian Academy.
11 Q. Where's that located?
12 A. Jacksonville, Florida.
13 Q. What did you teach?
14 A. I taught English and speech.
15 Q. And how long did you teach there?
16 A. A year.
17 Q. And why did you leave?
18 A. Because, again, it was not a career move. It
19 was not my intention to be a teacher. It was an
20 opportunity that was offered to me right after college.
21 Q. Were you -- did you resign or were you
22 terminated?
23 A. I actually don't even recall.
24 Q. Were there any allegations of inappropriate
25 behavior between you --

22

1 A. Not to my knowledge.
2 Q. Let me get my question out.
3 A. Sorry.
4 Q. Were there any allegations of inappropriate
5 behavior between you and any students at this school in
6 Jacksonville that led to your resignation or
7 termination?
8 A. Not to my knowledge.
9 Q. And you would agree with me that if you were
10 terminated for inappropriate behavior or allegations of
11 inappropriate behavior with children, that's something
12 you'd remember?
13 A. Certainly. Of course it was 30 years ago.
14 Q. Okay. But even 30 years ago, if you were
15 accused of inappropriate behavior with children at your
16 first job after graduating the Christian school of
17 Liberty University --
18 A. Uh-huh.
19 Q. -- that's something that would stick with you,
20 isn't it?
21 A. Yes, sir.
22 Q. When did you first become involved in movies or
23 theater or TV production?
24 A. Since I was very young.
25 Q. All right. When --

23

1 A. Thirteen, twelve, thirteen.
2 Q. When was your first paying job in the movie or
3 --
4 A. I have no --
5 Q. -- TV production?
6 A. I have no recollection.
7 Q. How long would you say that you've been in the
8 public spotlight?
9 A. Being in the public spotlight is kind of
10 subjective, you know, like what one person would
11 consider celebrity or whatever, I don't --
12 Q. Okay.
13 A. I -- I -- I couldn't answer that.
14 Q. That's fair. Let me -- let me -- let me do it
15 this way. Do you consider yourself to be a celebrity?
16 A. No.
17 Q. Okay. Why not?
18 A. Because I don't.
19 Q. You've been in movies before?
20 A. Yes.
21 Q. You've been on TV shows?
22 A. Yes, sir.
23 Q. You have voice acted for, what, hundreds of
24 Japanese anime films?
25 A. Yes, sir.

24

1 Q. You go to conventions where thousands of people
2 show up?
3 A. Yes, sir.
4 Q. You've taken -- over the course of your, let's
5 say last 20 years, you've probably taken pictures with
6 over 10,000 people; is that fair?
7 A. I don't know an exact number.
8 Q. Well, I mean, is it more or less than 10,000?
9 A. I couldn't answer. I couldn't tell you.
10 Q. Well, how many people --
11 A. I haven't kept count. Sorry.
12 Q. Well, do you think it's more than 100?
13 A. Sure.
14 Q. All right. What's the last convention you went
15 to?
16 A. I was at an event last weekend in Dublin,
17 Ireland.
18 Q. How many people did you take pictures with
19 there?
20 A. I didn't count.
21 Q. More than 100?
22 A. Probably not.
23 Q. Do you consider yourself to be a celebrity in
24 the American voice actor community?
25 A. I don't feel like it's for me to say whether

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25

1 I'm a celebrity or not.

2 Q. Okay. Anybody a more popular voice actor in

3 the, I guess, American anime community than you?

4 A. I'm sorry, would you ask that again, please?

5 Q. Yeah. I mean -- all right. You're -- you're

6 -- I know you're involved in cartoons, or something like

7 that, so how would you describe what it is you do for a

8 living?

9 A. I provide English voices for Japanese anime

10 that is -- that is dubbed into English.

11 Q. Okay. And is there a -- is there a lingo that

12 we can use in this deposition for that?

13 A. Voice actor.

14 Q. American voice actor?

15 A. Voice actor.

16 Q. Okay. All right. Is there anybody that you

17 know of in the voice acting community that is more --

18 has more celebrity than you?

19 A. I've never really thought about it.

20 Q. So as you sit here today, you don't know if

21 there's anybody that has more, what we call celebrity,

22 than you?

23 A. No, I do not.

24 Q. I mean, is -- is your -- is your reputation as

25 a voice actor, is that important to you?

26

1 A. Yes.

2 Q. Why?

3 A. My reputation, in general, is important to me.

4 MR. LEMOINE: Object as nonresponsive.

5 Q. (BY MR. LEMOINE) Is your reputation as a voice

6 actor important to you?

7 A. Of course.

8 Q. Okay. Why?

9 A. Because it reflects on me as a person, it

10 reflects on me as a professional in a field.

11 Q. And -- and do you feel like you have a positive

12 reputation as a voice actor in your field?

13 A. I believe I do.

14 Q. And how long have you had that, what you would

15 call, positive reputation?

16 A. Well, I've been a voice actor for almost 20

17 years, so I can only assume that since I've been hired

18 repeatedly for, you know, over 20 years, that somebody

19 must think I'm relatively good at what I do.

20 Q. And over the last 20 years, have you attended

21 conventions or Japanese anime films?

22 A. Yes, sir.

23 Q. Is that a -- is that how -- part of how you

24 make a living?

25 A. Sorry?

27

1 Q. Is that part of how you make a living?

2 A. Certainly.

3 Q. And I assume these conventions are open to the

4 public?

5 A. Yes, sir.

6 Q. And lots of people come and watch or meet you

7 at these conventions?

8 A. Yes, sir.

9 Q. What's the largest number of people that you

10 think you've ever spoken to at one of these conventions?

11 A. I have no idea.

12 Q. More than 20?

13 A. Sure.

14 Q. More than 100?

15 A. Probably.

16 Q. More than 500?

17 A. That's the point at which I wouldn't -- I

18 wouldn't be able to comment specifically.

19 Q. Are you usually in a room of the same size that

20 we're in right now?

21 A. The sizes of the rooms vary.

22 Q. Are they bigger or smaller than the room we're

23 in?

24 A. They vary.

25 Q. Well, on average, are they bigger or smaller

28

1 than this room?

2 A. They vary.

3 Q. Okay. What's the smallest?

4 A. I've been in rooms, large rooms, that had a

5 small amount of people, I've been in small rooms that

6 have had a larger number of people. I mean, they're --

7 they vary.

8 Q. Is your personal reputation important to you?

9 A. Yes, sir.

10 Q. Why is that? Why?

11 A. The same reason anyone's is important to them.

12 Q. Well, not anyone is suing my clients for

13 defamation. You are, sir. So why is your reputation

14 important to you?

15 A. Well, because it goes to credibility, it goes

16 to the opportunity to continue to work and be hired.

17 Q. Anything else?

18 A. Nothing comes to mind at the time.

19 Q. If you think of something, feel free to jump

20 back in. It's not a power --

21 A. Yes, sir.

22 Q. It's not a power test.

23 With regard to your credibility, how has

24 whatever you think Mr. Toye has said, how has that hurt

25 your credibility?

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1 A. Mr. Toye has made a large number of public
2 assertions to which there is no evidence or proof.
3 They're very negative, they're -- they're defamatory.
4 Q. Okay.
5 A. And -- sorry.
6 Q. No, you get to answer until you're done.
7 A. No, go ahead. I'm -- I apologize.
8 Q. So Mr. Toye has made allegations that you would
9 consider to be unbelievable?
10 A. Yes, sir.
11 Q. All right. And so if those aren't credible
12 allegations, that really hasn't hurt your credibility,
13 has it?
14 A. There's a matter of public perception that I
15 think we can all agree is -- is pretty prevalent and
16 powerful these days.
17 Q. I understand what public perception is. I'm
18 trying to figure out whether or not somehow your
19 credibility has been hurt by what Mr. Toye has said.
20 A. Yes, I believe it has.
21 Q. Okay. How?
22 A. By altering the perception of people that make
23 decisions about my work and career.
24 Q. All right. And is Mr. Toye the only person
25 that's had this negative impact on the perception of

30

1 people that hire in your line of work?
2 A. No, I don't believe so.
3 Q. Other than Ms. Rial and Ms. Marchi, anyone else
4 that's done anything to hurt the -- your credibility in
5 the voice acting industry?
6 A. I'm sure.
7 Q. Can you identify any of them, as you sit here
8 right now?
9 A. No, sir, not -- not by name. Many of them are
10 screen names, you know, on a computer, you don't know
11 who they are, you don't know where they live, you know,
12 you -- you can't know, really.
13 Q. You would agree with me that the allegations
14 surrounding your alleged homophobia, anti-Semitism, and
15 sexual harassment are being discussed publicly, correct?
16 A. They are being discussed publicly, yes.
17 Q. And because of that public discussion, that's
18 hurting your credibility, isn't it?
19 A. Yes, sir.
20 Q. And it's not just Mr. Toye and Ms. Marchi and
21 Ms. Rial that are discussing that; is that correct?
22 A. Yes, sir.
23 Q. Are you suing anybody else, as we sit here
24 today?
25 A. No, sir.

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1 Q. Have you sent retraction letters to anybody
2 else?
3 A. No, sir.
4 Q. Would you agree with me that the damage to your
5 personal reputation is also damaging to your fan base?
6 A. Possibly.
7 Q. Would you agree with me that if this litigation
8 was resolved in one form or fashion, that that would be
9 a benefit to your fan base?
10 A. Would you rephrase that, please?
11 Q. Yeah. If this litigation was resolved, that
12 would -- that would help your fan base, wouldn't it?
13 A. I don't know.
14 Q. Well, for instance --
15 A. I've never been involved in anything like this.
16 I don't really know what the outcome would be or how it
17 would affect anything.
18 Q. Okay. How about this for an example: If the
19 litigation was resolved today, your fan base could save
20 their money and not donate to the GoFundMe campaign
21 that's been set up for you. Would you agree with that?
22 A. I have nothing to do with that.
23 MR. LEMOINE: Objection, nonresponsive.
24 Q. (BY MR. LEMOINE) Would you agree with me that
25 if this litigation got resolved, then your fan base

32

1 wouldn't have to donate to your GoFundMe campaign?
2 A. They don't have to donate. No one is
3 compelling them to donate.
4 Q. And no one's asking them to donate?
5 A. I'm sorry?
6 Q. And no one's asking them to donate?
7 A. Not that I know of. I have nothing to do with
8 that.
9 Q. Do you know how the money is spent?
10 A. No, sir.
11 Q. So who makes sure the money is actually spent
12 for your benefit?
13 A. I didn't set it up. I don't know anything
14 about it.
15 MR. LEMOINE: Objection, nonresponsive.
16 A. I don't know.
17 Q. (BY MR. LEMOINE) So you have a GoFundMe
18 campaign out there in your name. Do you know how much
19 money is in it?
20 A. No, sir.
21 Q. You have no clue?
22 A. No, sir.
23 Q. So somebody is raising money with your name and
24 face on a GoFundMe page. Do you agree with that?
25 A. That's what I've been told, yes.

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1 Q. And you have no idea -- do you know who runs
2 that account?
3 A. Do I know who funds the account?
4 Q. Runs the account.
5 A. Oh. I believe it was set up by a gentleman
6 named Nick Rekieta.
7 Q. How do you spell Rekieta?
8 A. I don't know. R-E-K-E --
9 MR. BEARD: I-E.
10 A. -- E-I-T-A -- I-E -- I-E-T-A.
11 Q. (BY MR. LEMOINE) All right. Do you know Mr.
12 Rekieta?
13 A. I'd never met him until, for the first time, a
14 couple of weeks ago.
15 Q. Where did you meet him at?
16 A. I met him at an anime convention in Houston.
17 Q. Is he your attorney?
18 A. No, sir.
19 Q. Has he ever represented you?
20 A. No, sir.
21 Q. Have you ever communicated with Mr. Rekieta by
22 email, text, any type of application on your phone?
23 A. Briefly.
24 Q. About what?
25 A. He wrote me back in, probably, February. I

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1 didn't know who he was, it was unsolicited, and I did
2 not reply. And then it was brought to my attention that
3 there was a gentleman on the internet who was making
4 videos and -- and being very supportive of -- of my
5 situation. And when they told me his name, I went back
6 into my email and looked up to see if that was the
7 person that had contacted me, and it was. And so I sent
8 him an email and thanked him for his support.
9 Q. Is that the only exchange that you-all had or
10 have you-all had continuous email, text message?
11 A. Occasionally.
12 Q. Did you talk about this litigation?
13 A. Briefly.
14 Q. Do you know what his cell number is?
15 A. No, sir.
16 Q. Is it stored in your phone somewhere?
17 A. Yes, sir.
18 Q. When's the last time you got a text message
19 from Mr. Rekieta?
20 A. I don't recall.
21 Q. Have you done anything to delete any
22 communications off your, either email or phone, or other
23 electronic devices, from Mr. Rekieta?
24 A. Well, I -- I have a routine of, once I finish a
25 conversation with somebody, I delete it because I don't

35

1 want to have 600 text messages. So if you and I have a
2 conversation about a particular thing, where are we
3 going to lunch today, whatever, once that conversation
4 is over, I delete it.
5 Q. All right. Have you ever done a factory reset
6 on your phone?
7 A. No, sir.
8 Q. Do you ever take your phone and put a lightning
9 cord in it -- well, strike that.
10 What kind of phone do you use?
11 A. iPhone.
12 Q. All right. Do you ever plug your iPhone into
13 your laptop?
14 A. I have, yes.
15 Q. When's the last time you did that?
16 A. I don't recall. It's been a while, actually.
17 Q. Have you done anything to remove communications
18 off your laptop?
19 A. No.
20 Q. All right. Do you have an iCloud account?
21 A. No -- wait.
22 Q. Just --
23 A. I -- I -- I -- I may, yes, actually.
24 Q. And do you know whether or not your phone backs
25 up to your iCloud account?

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1 A. I don't know.
2 Q. Do you have some type of administrator that
3 would help you with that, that handles --
4 A. No.
5 Q. So Mr. Rekieta communicates with you in
6 February of 2019, for the first time, and at some point
7 you reach back out to him and you-all have a
8 conversation.
9 Who came up with the idea of the GoFundMe
10 campaign?
11 A. Mr. Rekieta.
12 Q. And what was the purpose of the GoFundMe
13 campaign?
14 A. You'll have to ask Mr. Rekieta.
15 Q. What did Mr. Rekieta tell you the purpose of
16 the GoFundMe campaign was?
17 A. He said that he believed that the people who
18 supported my position wanted to help in any way they
19 could. And he said he was going to provide them a way
20 to do so, if they chose to.
21 Q. And you told him that was okay with you?
22 A. No. I did not give him permission. He had
23 already done it.
24 Q. Okay. Did you -- did he ask for permission
25 after he did it?

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1 A. No, sir.

2 Q. All right. You do realize that people have put

3 hundreds -- over \$100,000 into that GoFundMe account?

4 Did you know that?

5 A. If -- if that's the number you're telling me,

6 then I believe you. Voluntarily. I -- I believe. I

7 don't think anyone's been compelled to do anything.

8 Q. Did you ask Mr. Rekieta to set up this GoFundMe

9 campaign?

10 A. No, sir.

11 Q. It was a complete shock to you when it

12 occurred?

13 A. Define complete shock.

14 Q. Well --

15 A. That sounds rather, you know --

16 Q. Well, how about this: How many GoFundMe

17 campaigns have been set up for your benefit, without

18 your knowledge, in your lifetime?

19 A. None that I'm aware of.

20 Q. So this is the first?

21 A. As far as I know.

22 Q. And Mr. Rekieta wasn't a friend of yours when

23 it was set up, was he?

24 A. No, sir.

25 Q. All right. So would you agree with me that

38

1 that was kind of shocking, that a random individual that

2 you don't know sets up a GoFundMe campaign?

3 A. It was unexpected.

4 Q. Did you ever bless him doing that?

5 A. No.

6 Q. Are you okay with the -- the GoFundMe account?

7 A. As a matter of fact, sir, I remember when he

8 first told me that he had done it, I told him I -- I

9 didn't -- I didn't really know how I felt about it,

10 because I didn't want people -- you know, I didn't want

11 people giving money to something. And that was the

12 point at which he said what I just mentioned to you

13 earlier, that he felt that there were a lot of people

14 out there who felt that I was being treated unjustly and

15 wanted to help.

16 Q. So this GoFundMe campaign, you don't have any

17 idea how the money is being spent?

18 A. No, sir.

19 Q. Don't know who -- where the money is going?

20 A. No, sir.

21 Q. What happens to the money when this -- if

22 there's any money left over after this litigation is

23 over?

24 A. I -- I believe I was told at some point that if

25 there was money, any money that was not spent, left

39

1 over, as you say, would go to a charity, a charitable

2 cause.

3 Q. And who picked the charitable cause?

4 A. I don't remember.

5 Q. Does it strike you as odd that there's someone

6 out there raising money in your name and you can't tell

7 me how that money is being spent?

8 A. No, sir.

9 Q. Do you feel no responsibility to make sure --

10 A. No, sir.

11 Sorry.

12 MR. LEMOINE: Objection.

13 A. I apologize.

14 Q. (BY MR. LEMOINE) Thank you. So you feel no

15 responsibility to the --

16 MR. BEARD: Objection, form.

17 Q. (BY MR. LEMOINE) -- tens or thousands of

18 people that are putting money into this GoFundMe

19 campaign to make sure you know how the money is being

20 spent?

21 MR. BEARD: Objection, form.

22 Q. (BY MR. LEMOINE) Are you -- you struggling

23 with that question?

24 A. No, sir. I'm --

25 Q. Are you going to answer it?

40

1 A. I'm responding to my --

2 MR. BEARD: You can answer the question,

3 I'm sorry.

4 A. -- attorney's objection.

5 Q. (BY MR. LEMOINE) Oh. Unless he tells you not

6 to answer it, you have to answer it.

7 A. Okay. Sorry. I didn't know how that worked.

8 Q. Yeah.

9 MR. BEARD: No, that's right.

10 A. Please repeat the question.

11 Q. (BY MR. LEMOINE) Sure. You feel no

12 responsibility whatsoever to make sure that the money

13 being put into a GoFundMe campaign for your benefit, how

14 it's spent?

15 MR. BEARD: Same objection. Objection,

16 form.

17 You can answer the question.

18 A. My understanding is that it's being spent for

19 legal defense.

20 Q. (BY MR. LEMOINE) Okay.

21 A. And I trust what I've been told.

22 Q. All right. Where did you get the understanding

23 that it's being spent for your legal defense?

24 A. What's the name of the GoFundMe? Do you know

25 what it is?

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1 (Exhibit 11 marked.)

2 Q. (BY MR. LEMOINE) Sure. I'm going to show you

3 what's been premarked as Exhibit 11. I will represent

4 to you that Exhibit 11 is a screenshot of the GoFundMe

5 campaign called Vic Kicks Back, that started on February

6 19th, 2019. Are you with me so far?

7 A. Yes, sir.

8 Q. Have you ever seen the GoFundMe page?

9 A. No, sir.

10 Q. This is the first time you've ever seen it?

11 A. I haven't followed it.

12 MR. LEMOINE: Objection, nonresponsive.

13 Q. (BY MR. LEMOINE) Is this the first time you've

14 ever seen the GoFundMe page?

15 A. I don't recall if I've -- if I've looked at it

16 before, but --

17 Q. So -- so why is it that you don't feel a desire

18 to make sure that money that's being collected in your

19 name is spent properly?

20 MR. BEARD: Objection, form.

21 A. Because I didn't start it.

22 Q. (BY MR. LEMOINE) Okay. So --

23 A. I didn't request it.

24 Q. -- if Mr. Rekieta is some kind of con artist,

25 it's okay that he takes money from your fans because you

42

1 didn't start it?

2 MR. BEARD: Objection, form.

3 Q. (BY MR. LEMOINE) Fair point?

4 A. I have no knowledge of Mr. Rekieta being a con

5 artist.

6 MR. LEMOINE: Objection, nonresponsive.

7 Q. (BY MR. LEMOINE) If Mr. Rekieta is a con

8 artist and he is just taking money and doing whatever

9 with it that is coming from your fans, not your problem?

10 MR. BEARD: Objection, form.

11 A. I have nothing to do with it.

12 Q. (BY MR. LEMOINE) Okay. So not your problem,

13 right?

14 A. Correct.

15 Q. All right. Anybody else that you let use your

16 face and your name to collect money from your fans, that

17 you don't --

18 A. Not that I'm aware of. But I can assure you a

19 lot of people are using -- have used my face and my name

20 for their own purposes over the years and I don't have

21 anything to do with them.

22 MR. LEMOINE: Object as nonresponsive.

23 There's no question on the table.

24 Q. (BY MR. LEMOINE) Exhibit 11, the photo, that

25 is a photo of you?

43

1 A. Yes, sir.

2 Q. All right. Do you know if that's a copyrighted

3 photo?

4 A. No, sir.

5 Q. How old were you when that photo was taken?

6 Got to be 30, right?

7 A. Sorry?

8 Q. You gotta be about 30 when this was taken?

9 A. Oh, you're very kind. That was taken in

10 roughly 2008, 2009, I -- I -- I think, so I would have

11 been mid-40s.

12 Q. As you sit here today, other -- other than your

13 attorney, because I'm not allowed to get into those

14 communications, has anybody else told you how money that

15 is going into this GoFundMe campaign, how it's being

16 spent?

17 A. No, sir.

18 Q. You've never seen any documents that -- that

19 show how it's being distributed?

20 A. No, sir.

21 Q. As you sit here today, are you paying your

22 attorneys to represent you?

23 A. I have not, as of this moment, paid them.

24 Q. Okay. Do you have an engagement agreement with

25 them?

44

1 A. Yes.

2 Q. All right. And does the engagement agreement

3 have where you pay an hourly rate, or is it a

4 contingency fee agreement?

5 A. I don't recall.

6 Q. But as we sit here today, since -- since you've

7 been involved with your current attorney, Mr. Beard,

8 you've not paid him any money?

9 A. No, sir.

10 MR. BEARD: Counsel?

11 MR. LEMOINE: Yeah.

12 MR. BEARD: Can I interrupt? Off the

13 record just a second.

14 MR. LEMOINE: Let's go off. Let's go off

15 the record.

16 THE VIDEOGRAPHER: And we're going off the

17 record, the time is 10:43.

18 (Break taken from 10:43 a.m. to 10:43 a.m.)

19 THE VIDEOGRAPHER: And we're back on the

20 record at 10:43.

21 Q. (BY MR. LEMOINE) Real quick. If at any time

22 you want to take a break, this is not a -- this is not

23 the Bataan Death March.

24 A. Okay.

25 Q. So if you need to -- you need a break, as long

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1 as you answer whatever question is on the table --

2 A. Yes, sir.

3 Q. -- we'll take a break.

4 A. Yes, sir.

5 Q. All right. So I want to clarify something

6 about your engagement with your attorney.

7 As we sit here today, you've not paid Mr.

8 Beard any money?

9 A. No, sir.

10 Q. Okay. You had an attorney prior to Mr. Beard?

11 A. Yes.

12 Q. Who was that, if you remember?

13 A. Tonya.

14 MR. BEARD: Tonya something.

15 A. Tonya --

16 MR. BEARD: Meier?

17 A. Yes, Tonya Meier or Meiers.

18 Q. (BY MR. LEMOINE) Is she here in -- here in

19 Dallas-Fort Worth?

20 A. Yes, sir. Yes, sir.

21 Q. And how long did she represent you?

22 A. A few weeks.

23 Q. And you paid her some money?

24 A. Yes, sir.

25 Q. Are there any other attorneys that you have

46

1 paid in association with the --

2 A. No, sir.

3 Q. So do you know of any people, any of your fans

4 who have donated to this GoFundMe campaign?

5 A. No, sir.

6 Q. So when Mr. Rekieta came to you and said, I'm

7 going to go set up the GoFundMe campaign, did you-all

8 have a discussion of what the money would be used for?

9 A. He actually came to me and said, I've already

10 set one up and I wanted to tell you.

11 Q. Okay. And so it wasn't something you approved

12 ahead of time?

13 A. Correct.

14 Q. I mean, but -- but you're okay with it, right,

15 you're okay with there being a GoFundMe campaign out

16 there?

17 A. As I mentioned earlier, I -- I didn't have a

18 really good feeling about it at first, and I expressed

19 my concerns to Mr. Rekieta. And his response was, You

20 have a lot of people out there that feel like you're

21 being mistreated and they want to help, and it would

22 mean a lot to them to be able to help you, and -- so I

23 did not object.

24 Q. If anybody said that you approved Mr. Rekieta

25 of setting up the GoFundMe campaign, that would be

47

1 incorrect?

2 A. I did not object to it.

3 Q. But I'm -- I'm not asking whether or not you

4 objected. I understand that that's your position. I'm

5 wondering if you approved him doing that.

6 A. Well, I guess what I mean to say is if -- he

7 didn't ask me if it was okay if he did it. He just went

8 ahead and did it, and let me know that he was doing it.

9 Q. Okay.

10 A. That he had done it.

11 (Exhibit 17 marked.)

12 Q. (BY MR. LEMOINE) All right. I'm going to show

13 you what -- what has been marked -- premarked as

14 Exhibit 17. Do you recall issuing a tweet on

15 February 20th, 2019?

16 A. Not offhand, but --

17 Q. All right. I'm going to represent to you that

18 Exhibit 17 is me pulling a screenshot of a tweet from

19 you off of --

20 A. Uh-huh.

21 Q. -- your Twitter account for February 20, 2019.

22 Do you recognize this?

23 A. Yes, sir.

24 Q. Does it look like a tweet that you issued?

25 A. Yes, sir.

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1 Q. All right. I want to look on the left-hand

2 side, second column down. It says: A friend expressed

3 a desire to set up a GoFundMe for legal expenses. I

4 approved his kind offer and am so grateful, but I am not

5 managing it, nor will I personally receive any of it.

6 First question, the friend that expressed

7 that desire is Nick Rekieta?

8 A. Yes, sir.

9 Q. And you would agree with me that when he

10 expressed that desire, you approved it?

11 A. As I mentioned, he had already done it.

12 MR. LEMOINE: Objection, nonresponsive.

13 Q. (BY MR. LEMOINE) Does --

14 A. He did not express a desire to do it, he

15 expressed that he had already done it.

16 Q. Okay. So when you tweeted this out to your

17 people, you didn't say -- or on -- to all of your

18 followers -- how many do you have?

19 A. Twitter followers?

20 Q. Twitter followers.

21 A. Roughly, 113,000.

22 Q. Okay. So when you -- when you made this tweet

23 on February 20th, 2019 to all these people, you didn't

24 say, Mr. Rekieta, or my friend, set this up without

25 asking me, but -- but I was okay with it?

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1 A. No, sir, I did not.

2 Q. In fact, what you said was you gave it -- what

3 it appears to be is you gave it your blessing, didn't

4 you?

5 MR. BEARD: Objection, form.

6 Q. (BY MR. LEMOINE) "I approved his kind offer

7 and am so grateful," that's -- that's Nick -- that's Vic

8 Mignogna blessing the GoFundMe?

9 A. Well, I -- I wanted to communicate that I was

10 aware of it, and --

11 Q. And grateful, right?

12 A. And grateful.

13 Q. Yeah.

14 A. Certainly.

15 Q. And grateful.

16 A. Certainly.

17 Q. Because you-all are going to take that money,

18 and you-all are going to sue some women into the dirt,

19 aren't you, Mr. Mignogna?

20 MR. BEARD: Objection, form.

21 A. I'm sorry, say that again.

22 Q. (BY MR. LEMOINE) You-all are going to take

23 that money and you're going to grind some women down

24 into the dirt with this lawsuit?

25 MR. BEARD: Objection, form.

50

1 Q. (BY MR. LEMOINE) That's what you were going to

2 do?

3 A. No, sir.

4 Q. That's not what happened?

5 A. No, sir.

6 Q. I mean, where has the money been spent?

7 MR. BEARD: Objection, form.

8 A. You -- I don't know. As I mentioned in an

9 early -- to an earlier question.

10 Q. (BY MR. LEMOINE) You've sued Mrs. -- you've

11 sued Mrs. Rial?

12 A. Yes, sir.

13 Q. You've sued Ms. Marchi?

14 A. Yes, sir.

15 Q. Hadn't sued anybody else, right?

16 A. Mr. Toye.

17 Q. Mr. Toye.

18 A. Not yet, in answer to your question, anybody

19 else.

20 Q. Are there other people you plan on suing?

21 A. Possibly.

22 Q. Are there other people out there that have

23 damaged your reputation that I should know about?

24 A. Possibly.

25 Q. I mean, did they do more damage to your

51

1 reputation than my clients?

2 A. I don't think so.

3 Q. What was the money going to be used for?

4 MR. BEARD: Objection, form.

5 A. What was this money going to be used for?

6 Q. (BY MR. LEMOINE) Yeah.

7 A. Well, I would encourage you to read it

8 yourself.

9 MR. LEMOINE: Object as nonresponsive.

10 A. I will read it --

11 MR. BEARD: The witness answered the

12 question.

13 A. I will read it for you, sir. Oh, no, here.

14 The fund is set up for Vic's legal

15 defenses.

16 And as you know, as well, anything that was

17 left over was told, very clearly, that it would be

18 donated to charity.

19 Q. (BY MR. LEMOINE) Okay.

20 A. If this all ended tomorrow, the lion's share of

21 what -- of this money would go to charity, which, I'm --

22 I assume you would approve of.

23 MR. LEMOINE: So object as nonresponsive.

24 Q. (BY MR. LEMOINE) My first question is, so the

25 money in -- according to the GoFundMe page, is for your

52

1 defenses, correct?

2 A. That's my understanding.

3 Q. Are you being sued by anybody right now?

4 A. No, sir.

5 Q. So what is the money defending against?

6 A. That seems like a semantic to me. I think we

7 both know what it's for. It's -- it's --

8 Q. Oh, yes, we do.

9 A. It's for the lawsuit itself.

10 Q. That's right, it's for you to sue two women

11 that have accused you of sexual harassment --

12 MR. BEARD: Objection.

13 A. No, sir.

14 MR. BEARD: Objection, form.

15 Q. (BY MR. LEMOINE) Oh, it's not -- the money's

16 not for you -- for -- not to be used to help you sue two

17 women that have accused you of sexual harassment?

18 A. The money is -- is to be used for me to seek

19 justice for defamation of my reputation.

20 Q. Are you aware of any other GoFundMe campaign in

21 the entire United States where a man accused of sexual

22 harassment gets money to go sue his accusers?

23 A. No, sir.

24 Q. I mean, you're a unicorn, aren't you?

25 MR. BEARD: I'm sorry, could you say that

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1 again?

2 A. What do you mean?

3 Q. (BY MR. LEMOINE) I mean, you're literally the
4 only male in the entire United States accused of sexual
5 harassment who solicited money not to keep --

6 MR. BEARD: Objection, form.

7 Q. (BY MR. LEMOINE) -- himself out of jail, but
8 to go sue the harassers. Do you realize how unique you
9 are?

10 MR. BEARD: Objection, form.

11 A. Am I?

12 Q. (BY MR. LEMOINE) Do you realize it?

13 A. No, sir, I don't.

14 Q. Okay. I mean, you're --

15 A. I didn't ask for any of this, sir.

16 MR. BEARD: Okay. Let's take a break.

17 He's answered the question.

18 THE VIDEOGRAPHER: And we're going off the
19 record at 10:52.

20 (Break taken from 10:52 a.m. to 11:00 a.m.)

21 THE VIDEOGRAPHER: And we're back on the
22 record for the beginning of disc number 2. The time is
23 11:00 a.m.

24 Q. (BY MR. LEMOINE) Mr. Mignogna, I'd like you to
25 pull Exhibit 17 back out, and we'll talk about it a

55

1 rather vague, and that was when I wrote her. As I said,
2 we'd been friends, my understanding, for 20 years.

3 Q. Okay. The public apologies, what would those
4 be?

5 A. I -- I put out a tweet at some point that just
6 basically said, I am extremely sorry for any unintended
7 -- certainly unintended offense or, you know, anything
8 that has hurt or offended anyone. Certainly never my
9 intention. And I also apologized publicly at an event.

10 Q. And -- and what -- what did you think you were
11 apologizing for?

12 A. Inadvertently offending them.

13 Q. And when you say inadvertently offending,
14 you're talking about giving hugs or kisses, and things
15 like that, people that didn't want it?

16 A. Whatever it was that -- that people had a
17 problem with.

18 Q. Like, now, were you also referring to instances
19 -- the various instances in your hotel room where it was
20 just you and a woman?

21 A. No, sir.

22 Q. Was that a part of it? So the public and
23 private apologies didn't apply to that?

24 A. I'm sorry, say that again, please.

25 Q. You know, as we sit here today, that a number

54

1 little bit more. Left-hand side of the page, top
2 column, there's a discussion there about public and
3 private apologies.

4 What are the private apologies that you
5 made?

6 A. Shortly after Monica publicly stated that I had
7 done something that upset or offended her in some way,
8 I had been friends, at least I considered us friends for
9 a very long time, and so I wrote Monica an email,
10 basically saying I -- I am mortified if I've done
11 something somewhere in the past to upset or offend you,
12 but I -- would you please tell me what it is because I
13 -- I didn't know in -- what she was referring to in her
14 tweets.

15 Q. Is that the only person you privately
16 apologized to?

17 A. Yes, sir.

18 Q. Okay. And so if I understand this correctly,
19 Ms. Rial publicly made statements about you that
20 reflected negatively upon you?

21 A. Yes, sir.

22 Q. Did they describe why she felt negatively about
23 you?

24 A. The first several -- for the first bit of time,
25 I can't tell you exactly how much -- how much time were

56

1 of people have accused you of inappropriate behavior in
2 your hotel room at these various conventions. Do you
3 agree with that?

4 A. No, sir.

5 Q. You don't think that that's been -- you've been
6 accused publicly of inappropriate conduct in your hotel
7 room?

8 A. You said a number of people. I'm not aware of
9 a number of people accusing me of that.

10 Q. So you're quibbling over the word "a number of
11 people"?

12 A. Yes, sir, I am.

13 MR. BEARD: Objection, form.

14 Q. (BY MR. LEMOINE) Okay. How many?

15 A. I don't know. Do you?

16 Q. Well, how do you know it's not a number?

17 MR. BEARD: Objection, form.

18 A. I didn't say it wasn't a number.

19 Q. (BY MR. LEMOINE) All right. Let me strike
20 that. Let me start this one over.

21 How many people do you know of that have
22 publicly accused you of inappropriate conduct in your
23 hotel room?

24 A. I don't know.

25 Q. More than one?

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1 A. Yes.

2 Q. More than five?

3 A. I don't believe so, but I don't -- I don't --

4 Q. Somewhere between one and five?

5 A. Possibly.

6 Q. And you don't know who those people are that

7 have accused you of this?

8 A. I certainly know some of them.

9 Q. And all false, right?

10 A. I'm sorry?

11 Q. And all false?

12 A. Anything that happened was consensual.

13 Q. Okay. Exhibit 17, left-hand side of the page,

14 second column, talks about if there's any surplus, that

15 will go to the Salvation Army Dallas Domestic Violence

16 and Abuse Shelters.

17 Whose idea was that?

18 A. I don't recall, actually.

19 Q. But it wasn't yours?

20 A. No, sir.

21 Q. Have you ever donated to the Salvation Army

22 Dallas Domestic Violence and Abuse Shelters?

23 A. No, sir.

24 Q. Have you ever donated to any domestic abuse

25 shelters?

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1 A. No, sir.

2 Q. Have you ever donated to the Me Too Movement?

3 A. No, sir.

4 Q. Ever donated to any organization designed to

5 stop sexual harassment?

6 A. No, sir.

7 Q. Have you ever been arrested?

8 A. No, sir.

9 Q. And this is your first lawsuit ever?

10 A. Yes, sir.

11 Q. In this lawsuit, there's --

12 A. Does a divorce count? I guess not, does it?

13 Q. Kind of, but -- but I won't hold you to that.

14 A. Okay.

15 Q. Did you do anything to look for documents to

16 produce in this lawsuit?

17 A. I'm sorry?

18 Q. Did you do anything to look for documents to

19 produce in this lawsuit?

20 A. Can you -- can you --

21 Q. Let me -- let me --

22 A. -- clarify?

23 Q. In -- in most lawsuits, there's a process where

24 documents are requested from inside. Your attorney has

25 requested documents from my clients, we've requested

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1 them from you.

2 A. Uh-huh.

3 Q. Are you with me so far?

4 A. Yes, sir.

5 Q. All right. Have you done anything to pull any

6 documents together for this lawsuit?

7 A. I have provided everything to Mr. Beard that --

8 that was relevant, that --

9 Q. Okay. So let me -- let me break that down a

10 little bit. When you say provided to him, in what form

11 did you provide it? Did you give him your phone, give

12 him your computer?

13 A. I forwarded -- I -- I guess, I forwarded emails

14 or -- or --

15 MR. BEARD: Don't answer that. I'm going

16 to object to privileged -- to privilege.

17 MR. LEMOINE: Okay.

18 MR. BEARD: Don't answer.

19 Q. (BY MR. LEMOINE) Did anyone assist you in

20 selecting information that you forwarded to your client

21 [sic]?

22 A. Not to my knowledge.

23 Q. Did anybody provide you documents to provide to

24 your attorneys?

25 A. Not to my -- no, sir.

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1 Q. Where did you look for information; file

2 folders, computer, phone? Where did you look?

3 A. Well, I -- I didn't have a great deal, because

4 this has not been -- I -- it wasn't any kind of an

5 issue. When it came up, the only information that I

6 really had were any emails or -- or documentation

7 online, mostly.

8 Q. Okay. So let me see if I can narrow this down.

9 A. Stuff that might have been sent to me

10 anonymously.

11 Q. Do you -- did you have any type of computer

12 expert look at your phone or laptop?

13 A. No, sir.

14 Q. Did you give your attorneys or anybody else

15 access to your phone or laptop?

16 A. No, sir.

17 MR. BEARD: That's fine.

18 Q. (BY MR. LEMOINE) Were you given what are

19 called requests for production, it's an actual list of

20 requests for documents and it specifies what we're

21 looking for?

22 A. I believe my attorney was.

23 Q. Was that provided to you, do you know?

24 A. I believe he told me about it.

25 Q. Okay. I don't want to -- I can't get into

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1 that. How did you --

2 MR. BEARD: Off the record real quick.

3 MR. LEMOINE: No, I don't want to go -- I

4 don't -- I don't like that. If you have a -- if you

5 have a question, we can --

6 MR. BEARD: Works for me just fine. I

7 don't think you propounded requests for production. I

8 think -- is that right?

9 MS. CHRISTIE: No.

10 MR. ERICK: Yeah, well, just in the context

11 of the deposition.

12 MR. BEARD: Subpoena duces tecum is all we

13 got.

14 MS. CHRISTIE: Just a subpoena duces tecum.

15 MR. LEMOINE: Oh, my apologies.

16 MR. BEARD: Accepted.

17 **Q. (BY MR. LEMOINE) So any -- any documents that**

18 **have been provided to your attorney were provided by**

19 **you. Did you have assistance pulling documents and**

20 **providing them to the attorneys?**

21 **A. Not to my knowledge.**

22 **Q. There were a number of folders produced for --**

23 **to -- by your attorneys, one of them is called Fan Club**

24 **Discovery, and it's like a little icon folder.**

25 A. Okay.

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1 **Q. Did you put that together?**

2 A. No, sir.

3 **Q. Do you know how it would have gotten to your**

4 **attorneys?**

5 A. No, sir.

6 **Q. Do you know a woman named Lauren Kocich,**

7 **K-O-C-I-C-H?**

8 A. Yes.

9 **Q. And who is that?**

10 A. She is one of the moderators of the Risembool

11 Rangers fan club.

12 **Q. And how old is she?**

13 A. If I had to guess -- I don't know. But if I

14 had to guess, probably mid-20s.

15 **Q. Any idea why she would be producing documents**

16 **or why we even would be getting documents with her name**

17 **on it?**

18 A. No.

19 **Q. Are you familiar with a screen name or email**

20 **macwarrior_m@msn.com?**

21 A. No, sir.

22 **Q. What about chebedragonessa47?**

23 A. It's fun to say, isn't it?

24 **Q. Do you know who that is?**

25 A. No, sir.

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1 **Q. amandalynnmartin@yahoo.com?**

2 A. No, sir.

3 **Q. What about Jenna Gentry?**

4 A. No, sir.

5 **Q. Do you know who Martin Palmer is?**

6 A. No, sir.

7 **Q. How about a Christian Echols, E-C-H-O-L-S?**

8 A. No, sir.

9 **Q. Do you have any text messages with this -- with**

10 **this Ms. Rial?**

11 A. No, sir.

12 **Q. None at all?**

13 A. No, sir.

14 **Q. And, certainly, if you don't have any text**

15 **messages, then no one could be reporting that you were**

16 **showing text messages from Mrs. Rial at conventions?**

17 A. I'm sorry, say that again.

18 **Q. Well, I'm -- oh, let me see if I do it this**

19 **way. I heard a rumor that you've been going to**

20 **conventions and showing people text messages supposedly**

21 **from Monica Rial; is that true?**

22 A. Not to my knowledge.

23 **Q. Okay. Are you familiar with a website called**

24 **Kiwi Farms?**

25 **A. I've heard of it.**

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1 **Q. And do you know what it is?**

2 **A. Not -- I think it's some kind of an information**

3 **gathering website. I've never been there.**

4 **Q. How did you -- when did you first learn of it?**

5 A. Just during this -- during this incident, over

6 the course of this incident.

7 **Q. And how did -- I mean, when you say incident,**

8 **you're talking about the -- kind of the online eruption**

9 **of --**

10 A. Yes, sir.

11 **Q. -- allegations against you?**

12 A. Yes, sir.

13 **Q. And who introduced you to Kiwi Farms, or how**

14 **did you learn about it?**

15 A. I don't even remember.

16 **Q. Do you know what goes on in -- at Kiwi Farms?**

17 A. No, sir.

18 **Q. So what is it you know about Kiwi Farms?**

19 A. As I mentioned earlier, it -- it's some sort of

20 an information gathering website. That's about all I

21 know.

22 **Q. Do you know what doxing is, D-O-X-I-N-G?**

23 A. I've heard that word, yes.

24 **Q. What's -- what does that -- what does it mean**

25 **to you?**

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1 A. Well, my understanding of it is that -- that it
2 is the public publication or releasing of private
3 information about someone. I think that's -- that's my
4 understanding of it.

5 Q. Do you know if Kiwi Farms has anything to do
6 with doxing any witnesses in this lawsuit?

7 A. No, sir.

8 Q. That's certainly not something you would
9 support, is it?

10 A. No, sir.

11 Q. You -- you don't want witnesses', that are
12 going to testify in this case, public information shared
13 on the internet, do you?

14 A. I don't think public information -- or I don't
15 think that kind of information should be shared
16 publicly, no.

17 Q. Are you aware of anyone trying to get Kiwi
18 Farms to identify witnesses and disclose their
19 information?

20 A. No, sir.

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1 A. I believe that someone who makes accusations
2 publicly, especially with the intention of -- of
3 destroying someone's reputation or job, at least should
4 be identified. I don't believe somebody should have the
5 power to destroy someone and remain safely anonymous.

6 Q. Okay. So if women come forward and accuse you
7 of -- and are willing to testify, you want that public
8 -- their identities publicly disclosed, fair?

9 MR. BEARD: Objection, form.

10 A. I would expect as much public disclosure of
11 them as they have of me.

12 Q. (BY MR. LEMOINE) What about women who have not
13 publicly accused you of anything anonymously, should
14 they -- their names be disclosed?

15 A. Say that again, please, I'm sorry.

16 Q. Sure. What if there are women out there who
17 have never publicly accused you of doing anything
18 inappropriate, but are willing to testify in this case,
19 are -- should their identities be disclosed to the
20 public?

21 A. No, I don't believe so.

22 Q. Are you aware of anyone involved in this
23 lawsuit receiving death threats?

24 A. No, sir.

25 Q. Have you received any death threats?

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1 A. No, sir.

2 Q. And you certainly don't want anyone receiving
3 death threats?

4 A. Absolutely not.

5 Q. Okay. Do you think you're a pretty good judge
6 of character of people?

7 A. Apparently not. I thought I was.

8 Q. And when did -- when did you start to doubt
9 your ability to judge people's character?

10 A. When people that I have known for many, many
11 years, who have treated me publicly, privately to my
12 face, in dozens of settings, as friends, and then spent
13 the last five months trying to ruin my career and
14 reputation.

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7 **Q. And did you end up going to Kameha Con?**

8 A. I did. I spoke with him two or three months
9 later, after that hiatus, as I mentioned, and -- and he
10 told me that he didn't -- he didn't really see any
11 reason -- he -- he -- he didn't feel good about
12 canceling me, that he felt that there were people that
13 wanted me there and that, you know, barring any -- you
14 know, anything substantial, that he wanted to have me
15 back. And so I was very excited about that.

16 And he -- he -- my understanding, Sean, is
17 that he called or communicated with Monica and Chris
18 Sabat that he was going to re-invite me, and --

19 **Q. Did you get to go?**

20 A. And -- and -- and then they expressed more
21 pressure and -- toward him not to have me. He -- and he
22 went back and forth, vacillated on it for, I don't know,
23 a couple of weeks, and then -- we did have a contract as
24 well.

25 **Q. And what do you mean a contract?**

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1 A. A contract that I was to attend that event.

2 **Q. And you ended up going to the event?**

3 A. Yes, sir, I did.

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11 Q. Do you believe that you have been damaged as a
12 result of the defamatory statements that you allege were
13 made by the defendants in this case?
14 A. Yes.
15 Q. Do you have a -- can you put a monetary value
16 on that?
17 A. No.

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14 Q. You said earlier that you sat by for five
15 months before you did anything with regard to these
16 allegations.
17 You would agree with me the GoFundMe
18 campaign started at the end of February 2019, correct?
19 A. I believe that's what your -- the exhibit you
20 gave me said. I -- I don't remember when it started.
21 Q. And -- and then you put a tweet out on
22 February 20th where you talk about hiring a law firm,
23 correct?
24 A. I -- I don't remember the date, but I -- I put
25 out a tweet if -- I put out very few tweets, and one --

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1 the one that I remember was I -- I felt like I -- I have
2 no recourse left, but --
3 Q. Okay. If you pull Exhibit 17 back out in front
4 of you.
5 A. Okay.
6 Q. Do you recall -- do you recall Exhibit 17 is
7 your February 20th tweet where you discuss GoFundMe
8 being set up? Do you remember that?
9 A. Yes, sir. Yes, sir.
10 Q. All right. And you'd agree with me that what
11 you're telling the people that follow you on Twitter is
12 that you've retained a law firm -- firm to defend your
13 reputation as of February 20th; is that right?
14 A. Yeah, see, by the way, that's a different law
15 firm than -- than Mr. Beard, I believe. It wasn't -- I
16 can't keep track of the dates. There was the Tonya
17 woman that I mentioned earlier.
18 MR. BEARD: If I could interject, Counsel.
19 THE WITNESS: I'm sorry.
20 MR. LEMOINE: Sure.
21 THE WITNESS: I --
22 MR. BEARD: Yeah, you hired us, like, I
23 think on the 20th, but Tonya was not officially
24 discharged until --
25 THE WITNESS: Oh, okay.

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1 MR. BEARD: -- a couple of weeks later.
2 THE WITNESS: Okay.
3 MR. BEARD: It was kind of a blur.
4 MR. LEMOINE: Okay.
5 MR. BEARD: So -- but you had retained
6 counsel.
7 THE WITNESS: Okay.
8 Q. (BY MR. LEMOINE) Okay. Just so I'm clear, by
9 February 20th, you had retained Mr. Beard?
10 A. Yes, sir.
11 Q. And did you know Mr. Beard prior to this --
12 these events that --
13 A. No, sir.
14 Q. -- led to this lawsuit?
15 And who introduced you to him?
16 A. Mr. Rekieta.
17 Q. Do you know their -- how their -- where their
18 relationship started?
19 A. No, I don't.
20 Q. Did -- and Mr. Rekieta never told you how he
21 knew Mr. Beard?
22 A. No. Mr. Rekieta told me that he knew I was in
23 Texas and that he knew an -- an attorney in Texas if I
24 wanted to speak with him.
25 Q. And so after you hired Mr. Beard, is it -- is

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1 it your testimony that you basically sat silently for
2 the next couple of months until you finally decided to
3 sue somebody?
4 A. Pretty much.
5 Q. Can you think of instances in the last five,
6 six years where someone has impugned your reputation in
7 the voice acting community and you just walked away from
8 it and did nothing?
9 A. Certainly.
10 Q. Does that happen often?
11 A. There are always disgruntled fans and people
12 that are looking for attention in some way. I have
13 largely ignored it because attention is exactly what
14 they want, so I tend to ignore it. And it's never --
15 never been an issue. And -- and this time, this all
16 started, ironically, at the moment that the Dragon Ball
17 Broly movie that I was the main character in was
18 released, to the day. The day that it was released,
19 this was launched against me. And I didn't do anything
20 about it for a while, quite a while, thinking, well,
21 it's just the same old people trying to get some
22 attention. And then it just didn't -- it just didn't
23 abate, and so --
24 Q. And -- and what happened in -- when the Dragon
25 Ball movie was released in January of 2019?

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1 A. What do you mean what happened? May I ask what
2 you mean?

3 Q. You said the same day it was released, this
4 started. What -- what happened?

5 A. The social media attacks began and, like I
6 said, this has happened in the past, you know, so --

7 Q. All right. Prior -- prior to 2019, have you
8 ever been banned from a convention?

9 A. Not to my knowledge.

10 Q. And prior to 2019, have you ever been asked not
11 to come back to a convention?

12 A. Not to my knowledge.

13 Q. Prior to 2019, have you ever not gotten an
14 invitation to a convention that you attended a year
15 before?

16 A. Well, that's not unusual at all. Because once
17 the convention has you as a guest, they don't typically
18 bring the same people back every year because of the
19 number of people in the industry. In fact, I'm
20 actually -- I'm actually an exception because I -- I --
21 I -- I do -- I -- I do get invited back often to the
22 same events, so I -- if somebody doesn't invite me back,
23 there's nothing really unusual about that.

24 MR. LEMOINE: All right. Object as
25 nonresponsive.

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1 Q. All right. What about Tekkoshococon?

2 A. I was at Tekkoshococon last year.

3 Q. 2018?

4 A. Yes, sir.

5 Q. And did you get invited back for 2019?

6 A. No. As I said, typically with 70 or 80 voice
7 actors and industry people, writers, directors, artists,
8 they don't typically invite the same people back every
9 year.

10 MR. LEMOINE: Object as nonresponsive after
11 no.

12 Q. (BY MR. LEMOINE) What about the RTX, Rooster
13 Teeth Convention?

14 A. I attended that event two years -- two years
15 ago, and was not there last year, and was supposed to be
16 back there this year, but there -- the -- it was
17 rescinded, the invitation was rescinded.

18 Q. All right. What about Louisiana anime
19 MechaCon, have you ever been uninvited?

20 A. Not to my knowledge.

21 Q. When's the last time you went to that con?

22 A. I -- I don't know, sir. I don't remember.

23 Q. Do you know a woman named Kat Thompson?

24 A. Not -- no, don't believe so. Not by name.

25 Q. Okay. Are you familiar with a company called

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1 A. Okay.

2 Q. (BY MR. LEMOINE) Has anyone ever told you that
3 you are not welcome back at a particular convention?

4 A. No, sir.

5 Q. What about Metrocon, have you ever been not
6 invited back to Metrocon Tampa?

7 A. I was at Metrocon two years ago, sir.

8 Q. But you didn't -- so that would have been in
9 2017?

10 A. I -- I -- I think it was 2017.

11 Q. Didn't go back in 2018?

12 A. No, sir.

13 Q. Didn't get invited back in 2019?

14 A. No, sir.

15 Q. And do you know why?

16 A. No, sir.

17 Q. Okay. What about Anime Central, have you ever
18 --

19 A. I was at Anime Central, I believe, two years
20 ago, maybe three years ago.

21 Q. 2016 or 2017?

22 A. Yes, I've -- I've been there.

23 Q. And haven't been -- been back since that last
24 time?

25 A. No, sir.

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1 Sentai Filmworks? It's S-E-N-T-A-I.

2 A. I believe Sentai is the new company that was
3 formed in Houston. It's an anime dubbing company.

4 Q. What was the name of the company before then?

5 A. I believe it was ADV Films.

6 Q. Okay. And were you ever fired from either
7 Sentai or AD Film -- ADV Films?

8 A. No, sir. I moved.

9 Q. Okay. So you weren't -- you weren't fired by
10 them?

11 A. No, sir.

12 Q. Okay.

13 A. I moved -- I was living in Houston and I moved
14 to L.A., or started working more in L.A. I even came
15 back on a couple of occasions and worked at Sentai.

16 Q. What about Gear Box, have you ever been
17 terminated by Gear Box?

18 A. I don't think I have ever worked for Gear Box.

19 Q. Are you familiar with a company called Rooster
20 Teeth Productions, LLC?

21 A. Yes, sir.

22 Q. Just call it Rooster Teeth for short.

23 A. Yes, sir.

24 Q. What does Rooster Teeth do?

25 A. They dub -- they -- they produce, I believe,

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1 original animated content.

2 Q. And have you worked for Rooster Teeth in the

3 past?

4 A. Yes, sir.

5 Q. From when to when?

6 A. Oh, goodness. They cast me in a production

7 probably four -- I don't even know, four, five years

8 ago. And I recorded my lines remotely and sent them my

9 lines, and played a character in a -- recurring

10 character in a show of theirs until I was terminated

11 earlier this year.

12 Q. And -- and was your relationship with Rooster

13 Teeth, was -- were you an employee or independent

14 contractor?

15 A. Just -- just an independent contractor, I

16 believe.

17 Q. And -- and you know the distinction between an

18 employee and an independent contractor?

19 A. I -- I -- I assume -- I'm so sorry. I assume,

20 like an employee, like, gets a regular paycheck, and

21 they take out taxes and, you know, that kind of thing,

22 and -- and independent contractor is just hired per

23 project.

24 Is that close?

25 Q. I would say that's close.

106

1 A. Okay.

2 Q. And -- and do you know the difference between a

3 W-2 and a 1099?

4 A. Yes. Well, one of them is what an employee

5 gets and one of them is -- I guess; is that right?

6 Q. That's right.

7 A. Okay.

8 Q. Okay. So do you know if you -- you would -- as

9 far as you knew, you were an independent contractor for

10 Rooster Teeth?

11 A. As far as I know. I have been hired to do so

12 many recording projects for 20 years that I don't even

13 really think about the distinction much.

14 (Exhibit 19 marked.)

15 Q. (BY MR. LEMOINE) Let me show you what we're

16 going to -- we're getting premarked as Exhibit 19. If

17 you'd look on page 7 of Exhibit 19. Is that your

18 signature?

19 A. Yes, sir.

20 Q. And you recognize this as an independent

21 contractor agreement --

22 A. Yes, sir.

23 Q. -- that you had with Rooster Teeth?

24 A. Yes, sir.

25 Q. And you signed it sometime in December of 2018?

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1 A. Yeah. They sent it to me at the very end of

2 last year.

3 Q. All right. And after December 2018, did you do

4 any work under this independent contractor agreement for

5 Rooster Teeth?

6 A. I -- I don't remember. I don't think so. I

7 mean, I -- like I say, I play this recurring character,

8 and as they would need more lines from me, they would

9 send me the lines and I would record them and send them

10 back. I really didn't -- didn't keep track of the

11 dates, but I don't think so.

12 Q. And are you typically paid, like, a day rate or

13 an hourly rate?

14 A. Yes.

15 Q. Which one?

16 A. Oh, sorry. Hourly rate.

17 Q. It's an hourly rate?

18 A. Yes, sir.

19 Q. Okay. And you keep your time and send it in,

20 and they'd send you a check?

21 A. Yes, sir.

22 Q. And do you get any type of back-end percentage

23 of --

24 A. No, sir.

25 Q. So not from Rooster Teeth?

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1 A. I wish. No, sir.

2 Q. Now, at any point in time, were you made aware

3 that Rooster Teeth was doing any type of investigation

4 into you?

5 A. No, sir.

6 Q. You said at some point you were terminated by

7 Rooster Teeth; is that correct?

8 A. Yes, sir.

9 Q. How did -- how was that communicated to you?

10 A. By email.

11 Q. Okay. And what was the -- who sent you the

12 email?

13 A. Well, there were several people on the email.

14 They were mostly, you know, I -- I assumed people at

15 Rooster Teeth. And they said -- it was really

16 interesting -- that I had been corresponding with a

17 friend, who is one of their producers, named Koen, who I

18 believe might have even signed this. Yes, Koen Wooten.

19 He and I had been corresponding at the very

20 beginning of this social media, for several weeks at the

21 beginning, and expressed how unfortunate and how crazy

22 it was, and -- and that he certainly didn't believe any

23 of the -- the garbage that was online. And then out of

24 the blue, without any real advance anything, I got an

25 email one day from Rooster Teeth, and it was from, I

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1 guess, Gray Haddock was one of the people on the email,
2 I expect Koen was on it, there were probably four or
3 five. And it was sent to me and it basically said,
4 Effective immediately, we will no longer be requiring
5 your services.

6 Q. Was there any explanation?

7 A. You know what, yeah. It said, Pursuant to
8 section something or other, or, paragraph something or
9 other. And I wrote them back and said, I'm really sorry
10 to hear this. Can you please send me the portion of the
11 contract that you're -- that you're citing? Like,
12 what -- in other words, what, why, what did I do?

13 And I never got a response. Well, I didn't
14 get an intended response. I got a response from
15 someone -- one of the people on the thread, on the
16 Rooster Teeth email, who clearly didn't mean to send it
17 to me, and it said, quote, I'm sure we're all in
18 agreement, but no one is to reply to Vic.

19 I don't think they meant to send that to
20 me. But I never heard back from anybody and I never
21 attempted to contact anybody.

22 Q. Okay. So as far as you know, or sitting here
23 today, you don't really know why Rooster Teeth
24 terminated you?

25 A. No, sir.

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1 A. I don't know. She is a voice actress and she
2 was cast in a new project they're working on.

3 Q. Are you familiar with a -- obviously you are,
4 but you're familiar with the company Funimation
5 Productions --

6 A. Oh, yes.

7 Q. -- LLC, correct?

8 A. Yes.

9 Q. And that's the Defendant that you've sued in
10 this case?

11 A. Yes, sir.

12 Q. And what do they do?

13 A. They -- they dub Japanese anime into English.

14 Q. Similar to what Rooster Teeth does?

15 A. Yes, sir. Well, no, actually, Rooster Teeth
16 does original programming. They make up their own
17 stories and they animate them themselves, and the vast
18 majority -- if I'm not mistaken, the vast majority of
19 Funimation's properties are Japanese animation that have
20 already been produced, and --

21 Q. And were you an employee or an independent
22 contractor with Funimation?

23 A. I assume -- I assume, again, I was an
24 independent contractor. There was a period, a year, in
25 2017, that I was hired to direct a series for

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1 Q. No one has ever talked to you about it?

2 A. No, sir.

3 Q. And no one has ever said that it was because of
4 anything that any of the Defendants did?

5 A. No, sir.

6 Q. Do -- and do you know if you produced these
7 communications that Rooster Teeth sent you, to your
8 attorneys?

9 A. Yes, sir.

10 Q. And do you know if your attorneys ever reached
11 out and talked to Rooster Teeth about why you were
12 terminated?

13 A. Yes, I believe he did. I believe he attempted
14 to contact their legal counsel.

15 Q. And do you know if they responded?

16 A. They did respond, but I don't remember the
17 details of it.

18 Q. Okay.

19 A. If I remember correctly, they -- they -- there
20 wasn't really much of anything, any kind of a response.

21 Q. Did -- Mrs. Marchi or Mrs. Rial or Mr. Toye
22 work for Rooster Teeth, to your knowledge?

23 A. Ms. Rial does.

24 Q. Okay. And do you know if she's an employee or
25 an independent contractor?

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1 Funimation, and I -- I lived in a hotel in -- in Irving
2 for 12 weeks and -- and directed a series for them.
3 I -- I -- I assume I was -- that was probably an
4 employee -- like a -- an employment thing. It was
5 different than the contracted voice actor thing.

6 Q. Did you get a salary or were you paid by hourly
7 work?

8 A. Well, it was -- it was -- it was hourly, but it
9 -- but there was like -- it was like, you know, taxes
10 taken out, kind of thing. You know, it was like a --

11 Q. Does -- Mrs. Rial, has she worked -- ever
12 worked for Funimation?

13 A. Oh, yes.

14 Q. And do you know if she was an employee or an
15 independent contractor?

16 A. I don't know. I know that she has directed, as
17 well, and I know she's done a great deal of voice
18 acting, but I don't know her -- her employment status
19 with them.

20 Q. And what about Mrs. Marchi, do you know if she
21 --

22 A. The same. I don't know.

23 Q. And what about Mr. Toye, did he work for
24 Funimation?

25 A. I don't know.

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1 Q. Anybody ever told you Mr. Toye worked for
2 Funimation?

3 A. I can't recall that anyone has.

4 Q. Were you ever interviewed at any point in time
5 by Funimation with regard to allegations of improper
6 conduct by you?

7 A. I was contacted in mid-January, very shortly
8 after this -- the online social media stuff started, I
9 was contacted by someone at Funimation. Basically, it
10 was about a 20-second phone call where they basically
11 said, Someone from Sony would like to chat with you, can
12 you be available tomorrow at this time.

13 And so I said yes. And someone from Sony
14 contacted me and said that they had received some --
15 some incidents that they wanted to ask me about. And
16 that was the first I had heard of it.

17 Q. Okay. And that's the only time that -- that
18 you've ever dealt with any investigation --

19 A. Yes, sir.

20 Q. -- while at Sony?

21 A. Yes, sir.

22 Q. Does the name Tammi Denbow ring a bell to you?

23 A. Not off the top of my head, no, sir.

24 (Exhibit 24 marked.)

8 Q. Okay. So prior to January 25, 2019, you had
9 never met Ms. Denbow and didn't know who she was?

10 A. Not to my -- no, not to my recollection.

11 Q. All right. And January 25, 2019 is the first
12 time that you even knew that there was any kind of issue
13 --

14 A. Yes, sir.

15 Q. -- with your work?

16 All right. So did you have a conversation
17 with Ms. Denbow?

18 A. Yes. Yes, sir.

19 Q. Okay. What -- what do you recall of that
20 conversation?

21 A. She asked me about three incidents that had
22 come to their attention. The first one was a kiss with
23 a coworker at Funimation a few years earlier. One was
24 an interaction with Monica at a convention with a jelly
25 bean. And the third one was an incident that was

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1 reported to them of two twin ladies who I had met
2 several times at conventions and had invited to my room.
3 Q. Okay. So before I start asking you questions
4 --
5 MR. BEARD: Counsel, can we take a
6 30-second break?
7 MR. LEMOINE: Off the record.
8 THE VIDEOGRAPHER: We're going off the
9 record at 1:34.
10 (Break taken from 1:34 p.m. to 1:39 p.m.)
11 THE VIDEOGRAPHER: And we're back on the
12 record, the time is 1:39.
13 Q. (BY MR. LEMOINE) All right. So as I -- as I
14 recall your testimony, the three separate incidences
15 that Ms. Denbow wanted to discuss with you --
16 A. Yes.
17 Q. -- of those three, one of them is -- is Mrs.
18 Rial, correct?
19 A. Yes.
20 Q. The other two instances, are those women who
21 have publicly accused you of anything, meaning it's out
22 on -- they've given statements to magazines or otherwise
23 disclosed their names?
24 A. Not to my knowledge.
25 Q. All right. You know who these -- you know

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1 their -- their identities, correct?
2 A. Yes.
3 Q. If I ask you, you can tell me their names,
4 can't you?
5 A. Yes.
6 MR. LEMOINE: Mr. Beard, I would like an
7 agreement that with regard to questions surrounding not
8 Mrs. Rial, but these other two incidents, that we agree
9 to keep that confidential until we get a ruling from the
10 court.
11 MR. BEARD: That's -- yeah, I think that
12 will be okay. That's -- just to be clear, that's the --
13 MR. LEMOINE: Don't say the names.
14 MR. BEARD: Right. I was about to do that.
15 MS. CHRISTIE: That's the other two
16 incidents.
17 MR. BEARD: Oh, besides the jelly bean?
18 MR. LEMOINE: Let me see if I can
19 articulate the -- the -- the request.
20 MR. BEARD: That's fine.
21 MR. LEMOINE: What -- what we would like to
22 do is -- is currently hold -- put the portion of the
23 deposition under seal with regard to the two non Monica
24 Rial incidents.
25 MR. BEARD: The names.

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1 MR. LEMOINE: The names.
2 MR. BEARD: Nothing more?
3 MR. LEMOINE: Yes, the --
4 MR. BEARD: Agreed.
5 MR. LEMOINE: -- and the names.
6 MR. BEARD: Agreed.
7 MR. ERICK: Yeah, that was -- I mean, it --
8 it will include, you know, their residence and things
9 like that, but we're not going to get into that.
10 MR. BEARD: Names, addresses.
11 MR. LEMOINE: Identifying information.
12 MR. ERICK: Right.
13 MR. LEMOINE: Okay. So --
14 MR. BEARD: Agreed.
15 MR. LEMOINE: -- starting from this point,
16 the deposition will be under seal until I stop asking
17 questions about these two incidents.
18 MR. BEARD: The deposition or just the
19 names?
20 MR. ERICK: I mean, just the names. I
21 mean, just the names of the contact information. The
22 allegations I think are --
23 Q. (BY MR. LEMOINE) All right. So the first
24 incident with the woman that you had a kiss with, what's
25 her name?

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1 A. I'm allowed to say -- is it okay if I say?
2 Q. You say it and we're going to -- we'll -- it
3 will be removed from the transcript --
4 A. Okay.
5 Q. -- until the court rules whether or not it's
6 allowed.
7 MR. BEARD: Yeah, you're going to have
8 to --
9 A. Okay. XXXX XXXXXXXXXX.

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1	1 reading it, I'm sorry. 2 Q. All I'm saying, I'm going to represent to you I 3 pulled this off of the internet and it's a tweet, I 4 understand, that may have kicked off this firestorm 5 about you. Are you with me so far? 6 A. Okay. 7 Q. Looking at Exhibit 1, is this the tweet, or do 8 you know? 9 A. I don't know. 10 Q. Do you recall looking at the tweet back in 11 January of 2019? Did you know it came -- 12 A. The only tweet that I remember was one that 13 said, Sorry to bring this up on the day the Broly movie 14 is -- is being premiered, but I think it's time that 15 Funimation stop casting Vic Mignogna for his sex -- for 16 his misconduct, I think was the word they used. 17 And shortly after that, they started the 18 hashtag and, like I said, it just kind of picked up 19 steam. 20 Q. All right. And was the tweet on somebody's 21 Twitter that you were following, or is that something -- 22 A. No. No, sir. 23 Q. -- somebody told you? 24 A. Just somebody. There are lots of people out 25 there.
2 We've talked about Rooster Teeth, we've 3 talked about Funimation. Have you ever been 4 investigated for your behavior at any other company or 5 business that you ever worked for? 6 A. Not to my knowledge. 7 (Exhibit 1 through 9 marked.) 8 Q. (BY MR. LEMOINE) All right. I'm going to hand 9 you a binder that I've pretabbed with Exhibits 1 through 10 9. 11 A. Okay. 12 Q. Right now Exhibits 1 through 8 are in there. 13 I'll give you 9 when we get -- when we get through it. 14 A. Okay. 15 Q. And I'm giving your attorney Exhibits 1 through 16 8, as well. 17 You talked earlier in the deposition about 18 kind of this firestorm that kicked off about the same 19 time that Dragon Ball came out. Do you remember that? 20 A. Yes, sir. 21 Q. Turn to Exhibit 1. I'll represent to you that 22 Exhibit 1 is a tweet that I pulled off of the internet 23 from a person that uses the Twitter handle 24 @actuallyamelia. Do you recognize this tweet? 25 A. I'm sorry, say that again, please. I was	140
	1 Q. All right. And so after that, did -- did you 2 agree that it kind of became -- it went viral? 3 A. I suppose, yeah. 4 Q. Do you know why it went viral? 5 A. (Witness nods.) 6 Q. I mean, is there something about anything that 7 you've done over the past 20 years in the voice acting 8 community that would lend credence to people thinking 9 that maybe you were a sexual assaulter? 10 A. No. There are an awful lot of fans out there 11 who are really desperate for attention, and they often 12 like to talk about people to get it. 13 Q. And so your theory is that they make up stories 14 about you sexually assaulting them to get attention? 15 A. Absolutely. 16 Q. Wouldn't it be better to say 'I had sex with 17 Vic' to get attention, as opposed to say 'Vic assaulted 18 me'? 19 A. Oh, I'm sure, give it time, or if you haven't 20 seen it, I'm sure somebody out there would say that. 21 Q. But -- and that may or may not be true, right, 22 you've -- you have had sex with -- 23 A. Consensually, yes. 24 Q. In fact, you've had sex with so many people 25 consensually, you're not sure what the number is. And

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1 when I say people, I'm talking about people at these
2 conventions, right?
3 A. No.
4 Q. Do you know the number?
5 A. No. But it's not all at conventions, is my
6 point. I don't do that very much at conventions.
7 Q. Where do you reserve that behavior for?
8 A. Where I choose.
9 Q. If you look at the bottom of Exhibit 1, I
10 believe this is the first reply ever to this Amelia
11 tweet, and she says, I've heard hundreds of story about
12 what creepy is, and I'm always floored he gets -- still
13 gets invites.
14 Would you agree with me that that is
15 defamatory?
16 A. Sure.
17 Q. All right. And you -- whatever definition you
18 have of defamation, you would say that's defamatory?
19 A. Sure.
20 Q. Do you have any evidence, any proof, any
21 indication that any of the defendants had anything to do
22 with someone putting a tweet out about you on January of
23 -- January 16th, 2019?
24 A. I do not, no.
25 Q. And do you blame them for this tweet going out?

142

1 A. I have no --
2 MR. BEARD: Objection, form.
3 A. I have no reason to.
4 Q. (BY MR. LEMOINE) Okay. And you would agree
5 with me that this -- the tweet going out harmed your
6 reputation?
7 A. Not necessarily. Not at first, it was a
8 cumulative thing.
9 Q. Kind of a death by a thousand cuts? Have you
10 ever heard that phrase?
11 A. I have. Yeah, that's probably a good example.
12 Q. All right. Turn to Exhibit 2. Are you
13 familiar with an online magazine called Polygon?
14 A. I wasn't until -- until this came out.
15 Q. All right. And are you familiar with the
16 Polygon article written on January 25th, 2019, titled
17 Dragon Ball Super: Broly Voice Actor Responds to Sexual
18 Harassment and Home -- Homophobia Claims?
19 A. Uh-huh.
20 Q. You've read it before?
21 A. I -- I -- I probably did, yes.
22 Q. And when you read it, did you -- you didn't
23 think there was a whole bunch of things in here that are
24 false?
25 A. Yes.

143

1 Q. And when you read it, you thought there was a
2 whole bunch of things in here that are defamatory?
3 A. Yes.
4 Q. All right. Have you sued Petrana Radulovic?
5 A. Not yet.
6 Q. Do you recall if -- I'm going to say Mrs., but
7 I could be wrong, Radulovic, did she reach out to you to
8 speak on this particular article --
9 A. I don't recall.
10 Q. -- do you remember?
11 All right. Would you agree with me --
12 well, did anybody email this -- a link to this article
13 to you and say, Did this happen, or how did you find --
14 A. Well, I -- again, your friends tell you things
15 that are going on, and friends of mine told me that this
16 had been released.
17 Q. All right. Would you agree with me that this
18 article being released on the internet hurt your
19 reputation?
20 A. Sure.
21 Q. Do you blame any of the Defendants for the
22 release of this article?
23 A. I can't answer that. I mean, I -- I don't
24 know. At this point in time, I don't know whether any
25 of them had anything to do with this article or not.

144

1 Q. Okay. If you would turn to page 3 --
2 A. Yes, sir.
3 Q. -- on Exhibit 2. You flipped over to
4 Exhibit 3.
5 A. Oh, did I go too far? Oh, I'm sorry, I went to
6 Exhibit 3 instead of page 3.
7 Q. Right. So page -- page 2. Oh, I'm sorry, it
8 should be page 3.
9 A. Okay.
10 Q. It's Exhibit 2, page 3. Are you with me?
11 A. Yes, sir.
12 Q. All right. The last sentence on -- on page 3
13 reads, Mignogna said he will stop his physical
14 interaction with fans as a result.
15 Is that a -- is that a statement that you
16 made?
17 A. Yes. No, actually -- actually, no. The
18 statement that I made was I intend to alter my
19 interactions with fans moving forward.
20 Q. Okay. And have you done that?
21 A. Yes, I have.
22 Q. And do you still hug and kiss your fans?
23 A. No.
24 Q. Do you hug them at all?
25 A. They hug me, occasionally, and I -- it's funny,

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<p style="text-align: right;">145</p> <p>1 because as this has been happening in the events that</p> <p>2 I've attended since then, it -- I have never hugged</p> <p>3 anyone or asked them to hug me, but if a fan, who is</p> <p>4 clearly an adult, says, can I give you a hug, I will</p> <p>5 look at my handler, who is right here, arm's length</p> <p>6 away, witnessing everything, and say, Did you hear that</p> <p>7 she requested a hug? And I will usually do kind of a</p> <p>8 one little, one hand thing.</p> <p>9 Q. And -- and do you restrict that to adults?</p> <p>10 A. Yes.</p> <p>11 Q. Meaning you don't hug children anymore?</p> <p>12 A. No.</p> <p>13 Q. And you don't kiss on children anymore?</p> <p>14 A. No.</p> <p>15 Q. Do you agree with me that's kind of creepy,</p> <p>16 right?</p> <p>17 A. No.</p> <p>18 Q. Not creepy?</p> <p>19 A. Not when they ask you.</p> <p>20 Q. I mean, is there an age limit in which a child</p> <p>21 can ask you to kiss and hug on them and you say that's</p> <p>22 creepy?</p> <p>23 A. You see, when you say kiss, it sounds like</p> <p>24 something sexual, but somebody who is kissing a child on</p> <p>25 the forehead or the cheek as a -- as a symbol of</p>	<p style="text-align: right;">147</p>
<p style="text-align: right;">146</p> <p>1 kindness or appreciation, is not meant in any sexual</p> <p>2 way.</p> <p>3 Q. Besides yourself, do you know any 50-year-old</p> <p>4 men that kiss children on the cheek or forehead that</p> <p>5 aren't their children?</p> <p>6 A. I'm sure there are many.</p> <p>7 Q. I'm just asking if you know one.</p> <p>8 A. No. I never thought to need to keep a record</p> <p>9 of that. I don't.</p> <p>10</p>	

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6 Q. If you would turn to Exhibit 4. Are you
7 familiar with a magazine called -- or an online group
8 called the Anime News Network?
9 A. Yes, sir.
10 Q. Is that a fairly influential publication in the
11 anime world?
12 A. I -- I don't know.
13 Q. Have you been mentioned in it before in a
14 positive manner?
15 A. I don't even know, actually.
16 Q. Have you ever --
17 A. I've not really followed it.
18 Q. Have you ever read it before?
19 A. No, sir.
20 Q. All right. Were you aware that on May 30 -- or
21 January 30th, 2019, there was an article printed in the
22 Anime News Network online titled, Far From Perfect:
23 Fans Recount Unwanted Attention from Voice Actor Vic
24 Mignogna?
25 A. Yes, sir.

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1 Q. Did you read it when it came out?

2 A. I don't know if I did in its entirety, no.

3 Q. Do you know the author, Lynzee Loveridge?

4 A. No.

5 Q. Are there things contained in Exhibit 4 that

6 you consider to be defamatory?

7 A. Yes.

8 Q. You would agree with me that the statements

9 made in the Anime News Network article about you have

10 damaged your reputation?

11 A. Yes.

12 Q. Do you see anything that any of the Defendants

13 in this lawsuit have done with the publication of this

14 article?

15 A. I don't know. They could have. I don't have

16 any knowledge either way.

17 Q. If you would look on page 1 of Exhibit 4, third

18 full paragraph.

19 A. Uh-huh.

20 Q. About the middle of the page it says, The

21 thread quickly spread with over 4,000 retweets at the

22 time of this writing and over 400 comments, many

23 relaying their own negative experiences, including

24 unwanted and unsolicited physical interaction from the

25 Full Alchemist voice actor. Did I read that correctly?

158

1 A. Yes, sir.

2 Q. And you are the Full Alchemist voice actor?

3 A. I suppose so.

4 Q. And you agree with me this article is written

5 about you?

6 A. Yes, sir.

7 Q. Okay. Do you disagree with that, that -- or,

8 sorry, strike that.

9 Do you agree with me that that particular

10 thread accusing you of things on January 16th spread

11 like wildfire?

12 A. I assume so.

13 Q. Do you attribute anything that any of the

14 Defendants did, to it spreading like wildfire?

15 A. I can't answer that. Possibly. I don't know.

16 Q. Would you agree with me that kissing

17 14-year-old girls on the face, whether it's consensual

18 or not, is really not appropriate for a 40- or

19 50-year-old man?

20 MR. BEARD: Objection, form.

21 A. I would say a lot depends on context.

22 Q. (BY MR. LEMOINE) Okay. When is it -- what is

23 the context in which a 40- or 50-year-old man kissing a

24 14-year-old girl is appropriate?

25 A. Well, if it is requested, if the -- if the --

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1 in the past, this is the way I felt about it. I

2 apologized for this, by the way. I apologized for not

3 really considering, you know, that while there may be

4 500 people who appreciate that kind of kindness, there

5 may be a few that don't.

6 When they -- when they're visibly emotional

7 or upset, and you're wanting to be comforting and kind

8 to them, all of these things happened in full public

9 view of many people standing around, shooting videos,

10 taking pictures. It wasn't sexual in any way, it wasn't

11 private or sadistic or weird in any way. It was -- it

12 was literally meant as an act of kindness.

13 Q. Right. So if you would turn to page 3 of

14 Exhibit 4. Page 3, look at the bottom.

15 A. Two. This must be three.

16 Q. Three.

17 A. Uh-huh.

18 Q. So top photo, that's a picture of you --

19 A. Uh-huh.

20 Q. -- kissing a --

21 A. Uh-huh.

22 Q. -- woman, perhaps girl, in 2014. That would

23 have been fairly regular for you to kiss women on the

24 side of the face like that?

25 A. No, actually, it wasn't regular at all.

160

1 Q. That was irregular?

2 A. Yes.

3 Q. Do you even -- you don't remember this photo,

4 do you?

5 A. No.

6 Q. Okay. So how do you know it's irregular?

7 A. Because I know how often I do it, and it

8 doesn't happen very often.

9 Q. And when you say very often, you're talking

10 about it happens less than 50 times at convention?

11 A. I don't count, sir, I'm sorry.

12 Q. So then how do you know it's not often if you

13 don't count?

14 A. Because if it happened often, I would know that

15 it was pretty often.

16 Q. You would agree with me that it was happening

17 often enough that people were commenting on it and --

18 online for years, weren't they?

19 A. Yes.

20 Q. Okay.

21 A. I agree that people were commenting on it,

22 certainly.

23 Q. And even though people commented on it in a

24 negative light, you continued to do it, right?

25 A. Yes.

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1 Q. Do you ever give your phone number out to girls
2 under the age of 15 and 16?
3 A. No, sir, not that I recall at all.
4 Q. Be no reason to do that, right?
5 A. No, sir.
6 Q. Do you ever give out your email to girls under
7 -- under the ages of 15 and 16?
8 A. My email is very public, sir. I receive lots
9 of emails from fans.
10 Q. Do you correspond privately with women under
11 the age of 16?
12 A. Define correspond.
13 Q. Email, talk to them.
14 A. Fan letters?
15 Q. Yeah. Sure.
16 A. Sure, I'll write back and say, thanks so much,
17 I'm so glad you're enjoying my work, I'll look forward
18 to meeting you some day at a convention.
19 Q. Is that pretty much a standard response?
20 A. Yes, sir, very standard.
21 Q. And then this -- this chat, is there some kind
22 of private chat room where you can chat with your fans?
23 A. Sorry?
24 Q. Is there some kind of private chat room that
25 you use to chat with your Risembool Rangers?

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1 A. Well, the Rangers fan club has a chat room.
2 There's nothing private about it, anybody can join it.
3 And I -- I don't go in there more than once or twice a
4 year, actually, just to say hello and -- you know, I
5 mean, when people form a fan club for you, you want to
6 let them know you appreciate that and say hello
7 occasionally.
8 Q. Who -- who runs the Risembool Rangers? Is
9 there somebody that runs the website, keeps it up?
10 A. Well, there -- there is -- there is a woman who
11 runs the website, and there is -- there are several, as
12 I mentioned earlier, moderators, who just kind of, you
13 know, moderate chat rooms and kind of administrate
14 things. It's pretty loose.
15 Q. Does your mom have any role in dealing with
16 this Risembool Rangers website?
17 A. To some degree. I -- I don't know exactly to
18 what degree.
19 Q. Does she have a nickname that's associated with
20 that?
21 A. I believe she likes to be called the Matriarch.
22 Q. Would you agree with the proposition that at
23 least 40 percent of the people in Risembool Rangers are
24 under age?
25 A. No, sir.

163

1 Q. And why do you disagree with that?
2 A. Because I have no idea.
3 Q. So it could be more?
4 A. Or less.
5 Q. Or less. Is there any kind of age entry that a
6 person has to put when they get into -- when they become
7 a Risembool Ranger?
8 A. No, sir. It's a fan club. People who are fans
9 of something join voluntarily.
10 Q. If you would turn to page 6 of Exhibit 4.
11 A. Uh-huh.
12 Q. Second full paragraph, where it starts with
13 Mignogna.
14 A. Yes, sir.
15 Q. I want to skip down, one, two, three -- five
16 sentences. It says, While researching this article, I
17 kept learning of more conventions that supposedly
18 blacklisted Mignogna from ever returning, yet any
19 attempts to reach out to a long-time staffer at each
20 event were met with silence.
21 Do you know anything -- can you confirm or
22 deny that you've ever been blacklisted from a
23 convention?
24 A. No, sir.
25 Q. Now, would you agree with me that you were

164

1 given the opportunity to comment for this particular
2 article written by Anime News Network?
3 A. Yes, sir.
4 Q. And you declined?
5 A. Yes, sir.
6 Q. And why did you decline?
7 A. Because it occurred -- because it seemed to me
8 very clear that they were not interested in -- you know,
9 in -- in just relaying truthful information. It seemed
10 like they were more interested in -- in getting clicks
11 and -- and promoting rumor.
12 Q. Did you talk to anybody about what the article
13 was going to be about? Did they tell you or send an
14 email?
15 A. A reasonable person could assume what the
16 article was going to be about, considering that they
17 wrote it in the midst of this social media upheaval.
18 Q. Okay.
19 A. And I was right, it was about exactly what I
20 thought it would be about.
21 Q. And -- and you would agree with me this -- this
22 particular article was -- was very damaging to your
23 reputation?
24 A. It was damaging.
25 Q. I mean, and after this article came out, you

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1 started losing invitations to conventions, didn't you?

2 A. Not -- not -- a few, but -- but not, you

3 know --

4 Q. Well, you --

5 A. A few, but not -- not -- not a lot.

6 Q. What would a lot be?

7 A. Well, what I -- what I mean to say is that my

8 recollection is that I started losing more events after

9 Funimation and Rooster Teeth terminated me, and after

10 Jamie and Monica came out and -- and started posting

11 publicly.

12 Q. Well, how many -- how many conventions did you

13 lose, if you know?

14 A. I -- I don't remember. I don't remember

15 offhand.

16 Q. Were Jamie and Monica -- this article is

17 written on January 30th, 2019. Were Jamie and Monica,

18 were they posting prior to this time, or do you know?

19 A. I don't know.

20 Q. Okay. If you turn to Exhibit 5. Are you

21 familiar with an online blog called The Dao of Dragon

22 Ball?

23 A. No, sir.

24 Q. You don't know if that's popular with Dragon

25 Ball fans or not?

166

1 A. It may be. I don't know.

2 Q. Now, were you aware that The Dao of Dragon Ball

3 wrote an article about you?

4 A. I'm sorry?

5 Q. Were you aware that The Dao of Dragon Ball

6 wrote an article about you?

7 A. I -- I don't. This period was very, you know

8 --

9 Q. Okay. So --

10 A. I -- I don't know, specifically.

11 Q. All right. As you sit here today, have you

12 ever read this Exhibit 5?

13 A. Not that I recall.

14 Q. So you don't know what it says --

15 A. No, sir.

16 Q. -- about you one way or the other?

17 A. No, sir.

18 Q. And so you can't comment on whether or not you

19 blame any of the Defendants for any of the information

20 in it?

21 A. No, sir.

22 Q. You don't even know whether or not the -- the

23 article was defamatory?

24 A. I don't. I don't, but I -- I would lay odds

25 that it is.

167

1 Shall we read it and find out?

2 Q. I'll represent to you that this article was --

3 was posted online on February 1, 2019. When you print

4 it out, for whatever reason, it didn't print out the

5 date.

6 A. Okay.

7 Q. Are you with me? All right. So I want to turn

8 to page 3 of Exhibit 5.

9 A. Okay.

10 Q. All right. First full paragraph, second

11 sentence reads, However, numerous allegations of sexual

12 assault have shadowed Mignogna's career and continue up

13 to today. During the research for this article, over

14 100 independent allegations surfaced dating back to

15 2013.

16 Do you agree with that statement?

17 A. No, sir.

18 Q. You don't think there's been numerous

19 allegations of assault that have shadowed --

20 A. It didn't say numerous, it says over 100. I

21 don't agree with that. I've not seen a list of 100

22 names.

23 Q. Does it make a difference to you if it's 100

24 names or 10?

25 A. Makes a difference to them. That's why they

168

1 said 100; it sounds much more impressive.

2 MR. LEMOINE: Objection, nonresponsive.

3 Q. (BY MR. LEMOINE) Does it make a difference to

4 you if you're accused of 10 -- 10 ti -- 10 allegations

5 of sexual assault or just 100, or 100? Does it make a

6 difference?

7 A. Yes, it does.

8 Q. And why does it make a difference?

9 A. Because in a world of four billion people,

10 there are going to be people that don't like you, for

11 whatever reason, or have a problem with you, and the

12 more people there are, the more troubling it is.

13 Q. Are you aware of any other voice actors that

14 have -- have had numerous allegations of -- of improper

15 behavior against them?

16 A. Yes.

17 Q. Like who?

18 A. I'm not going to name them.

19 Q. Fair enough. So you're not the only one?

20 A. No, sir.

21 Q. I assume you're familiar -- familiar with the

22 Me Too Movement?

23 A. Yes, sir.

24 Q. I take it you -- you also believe that sexual

25 assault victims ought to be heard?

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1 A. Yes.

2 Q. And certainly don't want to silence them in any

3 way, right?

4 A. No, sir.

5 Q. Would you agree that most of your fans tend to

6 be female?

7 A. No, sir.

8 Q. If you would turn to page 8. Second -- or

9 first full paragraph, starts with another --

10 A. Yes, sir.

11 Q. -- or another. If you skip down four

12 sentences, it reads, This issue is exacerbated by his

13 age, as any 56-year-old who spends so much time

14 interacting with young girls on a website without

15 parental supervision and who then embraces and kisses

16 these children at conventions is going to raise

17 eyebrows, even if innocuous.

18 Do you agree with that statement?

19 A. No, sir. This is completely inflammatory.

20 Q. You don't think that it's odd that a

21 56-year-old man embraces and kisses children at

22 conventions --

23 A. No, sir.

24 Q. -- is going to raise eyebrows?

25 A. Sorry?

170

1 Q. What's inflammatory about the statement?

2 A. If I may.

3 Q. Sure.

4 A. "So much time." How much is that? Who's to

5 determine how much so much time is. "On a website

6 without parental supervisor." The person who wrote this

7 does not know any of that factually. This is meant to

8 inflame.

9 Hold on. Let me please finish. "Embraces

10 and kisses children." Yeah, like every other voice

11 actor does in public for photo ops at conventions. It's

12 not seedy and dirty and pervy. And the vast majority of

13 the people, many of them that I have met over the years,

14 have no problem whatsoever with it. There is a small

15 contingent that does, and I apologized to those people

16 in the tweet where I said, I -- I accept that I need to

17 be more mindful that not everybody is open to that kind

18 of interaction.

19 Q. And do you blame the Defendants for people who

20 have had that type of interaction --

21 A. No.

22 Q. -- or that reaction to this?

23 A. No.

24 Q. But you'd agree with me that that type of

25 reaction and the fact that it's being talked about has

171

1 damaged your reputation?

2 A. Please rephrase.

3 Q. Yeah. The fact that people have reacted

4 negatively, whether it's true or not, that you kissing

5 young girls, that has damaged your reputation, as we sit

6 here today?

7 A. To a degree.

8 Q. All right. Look at page 9. Under the word

9 allegations, are you familiar with a site called Vic

10 Mignogna Horror Stories?

11 A. No, sir.

12 Q. First time you've ever heard of it, today?

13 A. Yes, sir.

14 Q. Didn't know that it ran for six years?

15 A. No, sir.

16 Q. Are you familiar with a Twitter #kickvic?

17 A. I certainly know of it, yes.

18 Q. Do you know when it started?

19 A. If memory serves, it started very shortly after

20 January 16th, when the -- when the first tweets were put

21 up, were posted.

22 Q. And do you blame any of the Defendants for that

23 Twitter handle starting?

24 A. I don't know their involvement.

25 Q. Would you agree with me that Twitter handle has

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1 gotten some level of notoriety in -- in your -- your

2 community?

3 A. Sure.

4 Q. And would you agree with me that's also hurt

5 your reputation?

6 A. Sure.

7 Q. Do you know who -- who created the

8 #istandwithvic Twitter?

9 A. No, I don't, actually.

10 Q. Turn to page 17. Top paragraph reads, Even

11 without definitive proof following the recent

12 allegations in January, several conventions announced

13 that Vic Mignogna would no longer attend their

14 convention. For example, on January 28th, 2019, Planet

15 Comicon in Kansas City announced that Vic had canceled

16 his scheduled appearance.

17 Is that true?

18 A. Is what -- which part of it?

19 Q. Good question.

20 A. No, that's fine.

21 Q. My apologies. Did Planet Comicon cancel your

22 -- announce that you were -- wait a minute.

23 Did you cancel your appearance to Planet

24 Comicon?

25 A. No, sir.

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1 Q. Did Planet Comicon cancel your appearance?

2 A. Yes, sir.

3 Q. Did they tell you why?

4 A. No, sir.

5 Q. Have you ever spoken to any --

6 A. Well, I assume because of -- of what was going

7 on, but I don't know.

8 Q. But nobody that runs Planet Comicon has told

9 you why you weren't invited?

10 A. No, sir.

11 Q. If you look at the bottom of page 17, last --

12 last full paragraph, Likewise, the Rangerstop & Pop

13 Atlanta convention announced on January 18th that Vic

14 would attend a convention, that the fans sent them the

15 allegations and requested #kickvic. The staff replied

16 they had not heard these allegations before and

17 investigates them. Then on January 28th, the staff

18 cancels.

19 Is it true that Rangerstop & Pop Atlanta

20 canceled your attendance?

21 A. Yes, sir. That was a -- this was a first-year

22 convention, by the way. This was run by a friend of

23 mine, Nakia Burrise, who -- well, she was one of the

24 organizers of it. And -- and she had invited me, and

25 then she called me to say that they were just kind of

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1 really surprised by all these anonymous messages they

2 were getting, and they really were afraid, you know,

3 being a first-year event. And so, yes, they -- yes.

4 MR. LEMOINE: And do any of you --

5 Q. (BY MR. LEMOINE) Do you know how to spell that

6 -- that lady's name?

7 A. I'm so sorry?

8 Q. Do you know how to spell her name?

9 A. Oh. Nakia, N-A-K-I-A, Burrise, B-U-R-R-I-S-E,

10 I think. She was the yellow ranger in one of the

11 incarnations of Power Rangers.

12 Q. And when you talked to Ms. Burrise, did she say

13 that anything that any of the Defendants said or did was

14 -- was why they were canceling that?

15 A. Not specifically, no.

16 Q. Did she imply that, it was something that one

17 of the Defendants --

18 A. Not specifically, no. She didn't say any

19 names.

20 Q. Okay. So looking on paragraph -- or on page 18

21 -- or, I'm sorry, Exhibit 5, page 18. Are you with me?

22 A. Yes, sir.

23 Q. Second full paragraph. This was followed on

24 January 30th by Emerald City Comicon announcing Vic

25 Mignogna's appearance at Emerald City Comicon has been

175

1 canceled.

2 Is that true?

3 A. Yes, sir.

4 Q. And did you talk to anybody at the Emerald City

5 Comicon?

6 A. I did not speak with them. I spoke with one of

7 my friends, my -- an agent of mine who was working with

8 Emerald City.

9 Q. And who was that?

10 A. His name is Gary Hassen.

11 Q. And what did Mr. Hassen tell you?

12 A. Gary -- Gary told me that -- Emerald City is

13 owned by a larger company that puts on several events.

14 I believe the company is called Inform -- no, ReedPOP.

15 There are two big companies that buy a lot of

16 conventions. There's ReedPOP and there's Informa. And

17 Emerald City, I believe, is owned by ReedPOP. And for

18 the same reasons, they -- they told my -- my -- my --

19 they told Gary that -- that they had received anonymous,

20 you know, negative accusations and -- and that they were

21 canceling me.

22 Q. And did -- did Mr. Hassen relay to you that

23 anything the Defendants did caused ReedPOP to cancel the

24 -- that convention?

25 A. Not this specific convention, no, sir.

176

1 Q. Are you familiar with the concept of a broken

2 staircase?

3 A. I'm sorry?

4 Q. Have you ever heard of a broken staircase?

5 A. No, sir.

6 Q. Did you know that you were mentioned on a

7 website called Broken Staircase?

8 A. No, sir. What -- what is it?

9 Q. Turn to page 23 of Exhibit 5. If you look

10 under Broken Staircase. Apparently, you're the third

11 entry on the list for sexual misconduct with minors,

12 physical boundary violations, verbal and physical sexual

13 harassment, homophobia and anti-Semitism.

14 I take it you didn't know that?

15 A. No, I've heard that there was a list, and it's

16 preposterous.

17 Q. And, obviously, you disagree with that?

18 A. Absolutely.

19 Q. But you would agree with me that being on that

20 kind of list is damaging to your reputation?

21 A. Sure.

22 Q. Do you attribute anything to what the

23 Defendants have done for you being on that list?

24 A. I don't know. I don't know what any -- I don't

25 know what any actions that -- that I'm unaware of might

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1 be.

2 Q. Do you recall the date that you were terminated

3 by Funimation?

4 A. Well, can I consult one of your exhibits?

5 Q. Sure.

6 A. Whichever -- okay. So the conversation with

7 Tammi --

8 Q. January 25.

9 A. So I would guess it was on or about January 27,

10 28, I think, roughly.

11 Q. And that's when they called you and said --

12 A. Yes, sir.

13 Q. Okay.

14 A. Yes, sir.

15 Q. Are you familiar with Kara Edwards?

16 A. Yes, sir.

17 Q. And she is a voice actor in Dragon Ball Super?

18 A. Yes, sir.

19 Q. I forget. Adam Sheehan used to work at

20 Funimation?

21 A. Yes, sir.

22 Q. Have you ever had any negative run-ins with Mr.

23 Sheehan?

24 A. No, sir.

25 Q. Would it surprise you to learn that Mr. Sheehan

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1 considered sexual assault allegations against you to be

2 an open secret in the voice acting industry?

3 A. Yes, it would surprise me. All of my

4 interactions with Mr. Sheehan were always very positive

5 and friendly.

6 As we established early on in this

7 deposition, I apparently am not very good at -- at

8 assessing friends.

9 Q. If you turn to Exhibit 6. I will represent to

10 you that it's a screenshot from Rooster Teeth's Twitter

11 account.

12 MR. BEARD: Exhibit 6?

13 Q. (BY MR. LEMOINE) Are you familiar -- are you

14 familiar with this tweet?

15 MR. BEARD: Hold on, Counsel.

16 A. I --

17 MR. BEARD: Exhibit 6?

18 THE WITNESS: It's this one.

19 MR. BEARD: All right. Got it. Well, you

20 got the colored ones. We only got the black and whites.

21 Q. (BY MR. LEMOINE) I'll represent to you that

22 this was sent out on February 5th, 19 -- I think you

23 were told you were terminated by Rooster Teeth on

24 February 4th of 2019. Does that sound right?

25 A. I believe you. I didn't see this, but I was

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1 told about it.

2 Q. Okay.

3 A. I was in a pretty difficult state at this

4 point.

5 Q. Anything on Exhibit 6 that you consider to be

6 defamatory about you, obviously?

7 A. Sorry, I'm not the super fast reader.

8 Q. It's all right.

9 A. No, sir.

10 Q. Would you agree with me that even if it's not

11 defamatory, it -- being terminated by Rooster Teeth in a

12 public way, hurt your reputation?

13 A. Sure.

14 Q. Would you associate that termination with you

15 losing invitations to any cons?

16 A. Possibly.

17 Q. Anybody ever tell you that, that because

18 Rooster Teeth terminated you, we're not going to invite

19 you to this con?

20 A. There were certainly conventions that told me

21 that because I was terminated by Funimation and Rooster

22 Teeth, so in the same sentence they included Rooster

23 Teeth.

24 Q. As you sit here today, do you think that

25 Rooster Teeth has defamed you in any way?

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1 A. Not verbally, not publicly.

2 Q. Do you think privately they've defamed you in

3 some way, that you're aware of?

4 A. Possibly. I -- I'm not aware of anything

5 specific. But as you asked me earlier in the day, you

6 know, terminating me without even so much as a

7 conversation or any kind of an understanding of -- of --

8 of it was -- was pretty difficult.

9 Q. If you turn to Exhibit 7. Are you familiar

10 with the Funimation tweet terminating you?

11 A. Yes, sir.

12 Q. Have you seen it before?

13 A. Yes, sir.

14 Q. And is this a true and correct copy of that

15 termination?

16 A. Well, this is one of them.

17 Q. There was more than one?

18 A. Yes, sir.

19 THE WITNESS: Am I correct?

20 A. I'm sorry. May I consult my counsel? Is that

21 okay? I'm just --

22 Q. (BY MR. LEMOINE) I'll represent to you -- I'm

23 not trying to trick you.

24 A. Sorry.

25 Q. I'll represent to you that I took this from

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1 Funimation's page and cut it -- did a screenshot of it,
2 and those are the --
3 MR. BEARD: I think if you look here --
4 THE WITNESS: Oh, there it -- I'm so sorry,
5 it's below. That's the second tweet. The -- I was just
6 looking at the first one. So underneath it is another
7 one, and then a third one, right?
8 Q. (BY MR. LEMOINE) Right. Okay. So -- so let
9 me break it down into components.
10 The first thing is, do you consider the top
11 part of Exhibit 7 the big tweet, on February 11th, 2019,
12 that says, everyone, we want to give you an update on
13 the Vic Mignogna situation. Following an investigation,
14 Funimation's recast Vic Mignogna in Morose Mononokean
15 Season 2. Funimation will not be gauge -- engaging
16 Mignogna in future productions.
17 Do you consider that to be defamatory?
18 A. No, sir, that's not the big tweet. The big
19 tweets are the follows.
20 Q. The -- the two smaller ones?
21 A. Right.
22 Q. And when I say big tweet, I'm just saying it's
23 physically bigger.
24 A. Yeah, I was going to say -- okay.
25 Q. Right.

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1 A. Big as in important.
2 Q. Right. So --
3 A. Sorry.
4 Q. Right. So it's the two tweets below what we
5 call the second and third tweets, that you would
6 consider to be defamatory, correct?
7 A. Yes, sir.
8 Q. And the reason you consider them to be
9 inflammatory is -- defamatory is what?
10 A. Because they clearly imply that -- that I am
11 guilty of harassment, threatening behavior. There's
12 no -- there's no proof or evidence of -- evidence of
13 that. And if I'm -- if I -- if I'm not mistaken,
14 Funimation, on the phone, told me that they were not
15 going to be releasing any public statement. When they
16 terminated me -- I should say Sony. In the
17 conversation, they called me and terminated me, they
18 said they would not be releasing any public statement.
19 And shortly after, I can't remember, a week, two weeks
20 after, maybe a week, they started -- they released these
21 tweets publicly.
22 Q. Were there any other tweets other than these
23 tweets?
24 A. Not that I'm aware of.
25 Q. Looking at the second and third tweets, is

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1 there anything that you think is untrue about those
2 statements?
3 A. Well, as I -- as I said, it's a matter of
4 implication.
5 Q. Okay. But on its face, there's nothing that --
6 that you would point and say, that statement that Sony
7 doesn't condone harassment of any kind is -- is not --
8 it's untrue?
9 A. I'm sorry, please say that again.
10 Q. Right. As you sit here today, do you think
11 Funimation or Sony condones harassment?
12 A. Of course not.
13 Q. If you turn to Exhibit 8. Are you familiar
14 with a magazine called --
15 A. Oh, that's awesome, what a great picture.
16 Q. Are you familiar with a --
17 A. No, sir.
18 Q. All right. Let me get my question out.
19 A. Oh, I thought you just asked, and were
20 repeating it, I apologize.
21 Q. Are you familiar with a magazine -- online
22 magazine called Gizmodo?
23 A. No, sir.
24 Q. Have you ever seen or read the article from
25 Gizmodo, written on February 19th, 2019, titled one of

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1 biggest -- One of Anime's Biggest Voices Accused of
2 Sexual Harassment?
3 A. No, sir.
4 Q. Never seen it before today?
5 A. No, sir. I was told it was -- it existed. I
6 have not read it myself.
7 Q. So you haven't -- you -- I could go through
8 this, but you can't comment one way or another in terms
9 of as we -- strike that.
10 Right now, do you know whether or not this
11 article is defamatory about you or not?
12 A. I could lay really good odds.
13 Q. Okay. Do you know if -- turn to page 2.
14 Do you know Beth Elderkin?
15 A. No. I mean, I know the name, but I don't know
16 her personally.
17 Q. Did Ms. Elderkin reach out to you to comment on
18 this particular article?
19 A. Yes, she did.
20 Q. And did you comment?
21 A. I did.
22 Q. And did she -- how did that -- was it online --
23 strike that.
24 Did you email each other, or was it a phone
25 conversation?

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1 A. She emailed me, and I replied.
2 Q. And so did she -- in the email, did she list
3 out the allegations against you --
4 A. Yes.
5 Q. -- and actual responses?
6 A. Yes. And I replied to them, and she picked and
7 chose my replies to put into the article, and omitted
8 portions of what I -- of my replies.
9 Q. Did -- do you still have the copy of that
10 email?
11 A. I -- I'm sure I -- again, it's -- it's -- I'm
12 sure it's in an -- an old email folder.
13 Q. Do you know if you gave it -- provided it to
14 your attorneys at some point?
15 THE WITNESS: Did I -- had I even retained
16 you at that point?
17 Q. (BY MR. LEMOINE) It's February 19th.
18 MR. BEARD: If we have it, we'll -- we'll
19 produce it. I think I might.
20 A. Are you asking, sir -- are you asking about my
21 reply or are you asking about her email to me requesting
22 a comment?
23 Q. (BY MR. LEMOINE) So I didn't know that -- how
24 you communicated with her.
25 A. She wrote me unsolicited, said I'm writing an

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1 article for io9 and I'd like to ask if you would comment
2 on these issues. And I commented on them, bullet point
3 --
4 Q. Right.
5 A. -- and sent it back to her.
6 Q. And was it a pretty lengthy email that she sent
7 to you?
8 A. Yes, sir.
9 Q. Okay. And so you went through each of them and
10 --
11 A. Yes, sir.
12 MR. BEARD: Counsel, if I might, the -- I
13 think all that has -- has been released out on Twitter,
14 both the emails she sent to Vic and Vic's response.
15 MR. LEMOINE: Okay.
16 MR. BEARD: I think, yeah.
17 MR. LEMOINE: And I'm not -- I'm not
18 implying that you didn't produce it, I just didn't --
19 hadn't seen them.
20 MR. BEARD: Yeah. No, I'm just trying to
21 -- I'm trying to rack my brain to know if I did. It was
22 -- if it was, it was real early when this stuff was
23 going on. I don't think so.
24 Q. (BY MR. LEMOINE) Regardless, you -- it was --
25 there was no oral conversation with Ms. Elderkin?

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1 A. No, sir.
2 Q. Okay. So -- so we could go look and we'd get
3 the email and see exactly how you responded to whatever
4 she wrote.
5 All right. If you turn to page 6. Top
6 paragraph reads, When reached by io9 to comment,
7 Mignogna said that he had never forced himself on
8 anyone, claiming that any and all encounters I have ever
9 had have been 100 percent consensual. He gave specific
10 responses to the accusations present in this article,
11 denying some and providing his own version of events on
12 others. Did I read that correctly?
13 A. Yes, sir.
14 Q. And you haven't read the articles, you don't --
15 MR. BEARD: Counsel, sorry, I got -- I got
16 lost. Where -- where is that?
17 MR. LEMOINE: Page -- page 6.
18 MR. BEARD: Page 6. Okay.
19 MR. LEMOINE: Very top.
20 MR. BEARD: Yeah, okay, sorry, got it.
21 Q. (BY MR. LEMOINE) But you haven't gone through
22 this article to figure out whether or not she accurately
23 portrayed your commentary, your -- your responses?
24 A. I was told that -- who -- by people who knew
25 what I had responded to her and then read the article,

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1 that -- that they -- that she did not print my complete
2 responses.
3 Q. Right. Did anyone help you craft your
4 responses?
5 A. Yes.
6 Q. Was it an attorney?
7 A. No.
8 Q. Who was it?
9 A. It was a man-and-wife couple named Jessica and
10 Cliff, Jessica and Cliff -- I don't know their last
11 names. They're PR, you know, kind of -- just kind of
12 help people, and somebody -- actually, it was -- I don't
13 even -- I -- I think Todd Haberkorn --
14 MR. BEARD: I'll get you that -- those
15 names.
16 A. -- referred them to me.
17 Q. (BY MR. LEMOINE) Let me ask a few follow-up
18 questions and see if I jog your memory a little bit.
19 Have you ever used Jessica and Cliff's
20 services before?
21 A. No.
22 Q. Todd Haberkorn is the person who introduced
23 you?
24 A. Yes. Well, I -- may I -- may I --
25 Q. Sure.

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1 A. -- revise that? What I mean is I understood
2 that they had helped him craft a statement. I was --
3 didn't know what to do or how to respond to everything
4 that was happening and -- and I -- so I reached out to
5 them to see if they could help me, as well. Todd did
6 not call me and say, This is their name and number.

7 Q. Now, did you know Jessica and Cliff outside of
8 that?

9 A. No, sir.

10 Q. That's the first time you had ever met them?

11 A. Yes, sir.

12 Q. And so that would have been sometime in 2019?

13 A. Yes, sir.

14 Q. And do you know, were they -- are they local to
15 Dallas?

16 A. No, sir, I believe they're in Florida.

17 MR. BEARD: Florida.

18 Q. (BY MR. LEMOINE) And did you pay them?

19 A. Yes, sir.

20 Q. And did you meet them in person to discuss the
21 issues?

22 A. No, sir.

23 Q. Talk to them on -- talk to them on the phone?

24 A. Yes, sir.

25 Q. And would you have emailed with them?

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1 A. I probably did.

2 Q. Were there multiple drafts of your response
3 that you--all went over?

4 A. Yes, probably.

5 Q. And do you know -- and would you have emailed
6 those back and forth?

7 A. Between them and me?

8 Q. Yes.

9 A. Yes, sir.

10 Q. And do you know, were those -- did you save
11 those drafts on your computer somewhere?

12 A. No, no more than you save a rough draft of
13 something, you save the final draft, you know, and you
14 work on something and --

15 Q. But you would have edited the draft, sent it to
16 them; they would have edited and sent it back?

17 A. Actually, no. More than -- more times than not
18 they would write something, and then I would -- they
19 would send it to me, and then I would make adjustments
20 to it that I felt were appropriate.

21 And if I may say, there were things that
22 they actually suggested that I never posted, I never --
23 like I never ever released. Like we talked about
24 something, and then I just didn't feel good about
25 releasing it at all.

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1 Q. Meaning there was personal information that you
2 didn't want to discuss?

3 A. No, no, no. No, meaning that they wrote up
4 something that I didn't want to release, that I -- I
5 didn't want to -- I didn't want to get out. Not
6 personal information, just didn't want to exacerbate the
7 situation, you know.

8 Q. If you look at exhibit -- stay on -- still on
9 Exhibit 8, page 7.

10 A. Yes, sir.

11 Q. There's a reference to a woman named Rachel?

12 A. Yes, sir.

13 Q. Do you recall -- do you know who that Rachel
14 is?

15 A. No, sir.

16 Q. All right. If you look at the -- on page 7,
17 the second full paragraph, it says, Mignogna
18 acknowledges events that happened, including that he had
19 rubbed the back of Rachel's thighs, but said the
20 encounter was consensual.

21 You sure you don't remember who that is?
22 Because, obviously, her name is not Rachel.

23 A. If I -- may I have a minute to read this?

24 Q. Sure.

25 A. Where is the -- where does Rachel start here?

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1 Q. Page 6, last paragraph.

2 A. Yes, I believe that's Kara Edwards, and I think
3 that I replied in my reply to -- you know, in -- in the
4 email that I sent to -- to Beth Elderkin, I -- I
5 believe. I believe. But in my reply, I -- I stated
6 very clearly that many of the details of this were
7 untrue.

8 Q. All right. If you would turn to Exhibit 8,
9 page 9.

10 A. It's so funny to me.

11 Q. What -- what -- what's funny?

12 A. I'm reading this. So she has this horrific
13 experience, and then a second situation, she agreed to
14 come by my room briefly. Now, why would she do that?

15 I'm sorry. I -- I -- I didn't even -- like
16 I said, this is -- some of this is still kind of fresh.

17 Q. If you look at the bottom of page 7.

18 A. Yes, sir.

19 Q. Last paragraph. It says, Rachel says she did
20 not report the incident to hotel management or to police
21 because she feared Mignogna would attempt to negatively
22 impact her career. He's very well-known in the
23 industry, very, very powerful in our industry, she said.

24 Would you agree with the statement that
25 you're very, very powerful?

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193	<p>1 A. No, sir.</p> <p>2 Q. And why do you disagree with that?</p> <p>3 A. Because it's not true. Voice actors are a dime</p> <p>4 a dozen, and --</p> <p>5 Q. So you're --</p> <p>6 A. I have no power or influence. I audition for</p> <p>7 roles for 20 years just like everyone else. I get some,</p> <p>8 I -- I don't get many others.</p> <p>9 Q. Turn to Exhibit 8, page 9. Third full</p> <p>10 paragraph.</p> <p>11 A. Yes, sir.</p> <p>12 Q. This is in 2014, a professional cosplayer,</p> <p>13 Diana. That's not her real name.</p> <p>14 Do you know who it is?</p> <p>15 A. I'm fairly certain it was someone at an event</p> <p>16 in Hawaii. I'm fairly certain it was at an event, but</p> <p>17 I'm not -- I'm not sure, again. But I believe it was at</p> <p>18 an event.</p> <p>19 Q. And when the -- when Ms. Elderkin was provided</p> <p>20 the information, did she use the actual names?</p> <p>21 A. No, she did not.</p> <p>22 Q. She used -- okay. So pseudonyms of some sort?</p> <p>23 A. Yes, sir. And, of course, when I replied, I --</p> <p>24 I used the names of the people I believed these -- they</p> <p>25 were. Of course, she didn't publish that, but --</p>
194	<p>1 Q. Are you aware of anyone being harassed online</p> <p>2 that has come out against you in this -- during this</p> <p>3 controversy?</p> <p>4 A. No. Not personally, no. I do know that people</p> <p>5 that have defended have been viciously harassed. I do</p> <p>6 know that.</p> <p>7 Q. All right. If you turn to page 15.</p> <p>8 A. Sorry?</p> <p>9 Q. Page 15.</p> <p>10 A. Fifteen?</p> <p>11 Q. Yep.</p> <p>12 A. Yes, sir.</p> <p>13 Q. Top paragraph, four sentences down, it starts,</p> <p>14 but an email shared with io9 also showed Mignogna --</p> <p>15 MR. BEARD: Wait one second.</p> <p>16 A. Hold on, I'm sorry. I couldn't quite make out</p> <p>17 what you --</p> <p>18 MR. BEARD: Okay. I don't see 15 now.</p> <p>19 MR. LEMOINE: Exhibit 8.</p> <p>20 MR. BEARD: Oh, Exhibit 8, page 15. My</p> <p>21 bad. All right.</p> <p>22 Q. (BY MR. LEMOINE) Are you with me?</p> <p>23 A. Yes, sir.</p> <p>24 Q. All right.</p> <p>25 MR. BEARD: Oh, yeah, sorry. Yeah, sorry.</p>
195	<p>1 Q. (BY MR. LEMOINE) First full paragraph, fourth</p> <p>2 sentence down, says, But an email shared with io9 also</p> <p>3 showed Mignogna three days later privately telling a fan</p> <p>4 how a certain voice actor turned to be hateful toward</p> <p>5 me. Mignogna mentioned that person by name.</p> <p>6 Do you know who that is?</p> <p>7 A. No. Three days later from what? I'm -- I'm</p> <p>8 trying to get a context here.</p> <p>9 Q. Looks like it would be February 11th, based on</p> <p>10 context.</p> <p>11 A. Harassment included -- oh, this is -- okay. So</p> <p>12 the context here is people being harassed, correct?</p> <p>13 Q. Yes.</p> <p>14 A. Or -- or somehow being messed with because --</p> <p>15 right?</p> <p>16 Q. Yes.</p> <p>17 A. No, I -- I -- I don't know -- showed Mignogna</p> <p>18 three days later privately telling a fan how a certain</p> <p>19 voice actor had turned to be hateful toward me.</p> <p>20 Well, I -- I -- that's -- I don't remember</p> <p>21 that, but I don't -- that certainly has happened. But I</p> <p>22 have never encouraged anyone to -- to do any -- anything</p> <p>23 hateful or negative, attacking, certainly not death</p> <p>24 threats.</p> <p>25 Q. And anybody associated with you, do you know if</p>
196	<p>1 they've encouraged that type of behavior?</p> <p>2 A. No, sir. I've heard -- I've heard people tell</p> <p>3 that they've received death threats, and I've also heard</p> <p>4 that every time they're -- they're put on the spot to</p> <p>5 produce said death threats, they never do. I don't know</p> <p>6 if that's true or not so I -- I -- I've heard the buzz,</p> <p>7 but I don't really have any personal knowledge.</p> <p>8 Q. Right. If you turn to page 17. That block</p> <p>9 quote appears to me to be a quote from Ms. Specht, your</p> <p>10 former fiancée?</p> <p>11 A. Yes, sir.</p> <p>12 Q. First paragraph, last sentence. It says, I've</p> <p>13 had to face the reality that the loving, monogamous</p> <p>14 relationship I believed in and was devoted to never</p> <p>15 existed.</p> <p>16 Do you agree with Ms. Specht's hindsight</p> <p>17 review of your relationship?</p> <p>18 A. No. It certainly did exist at some point, but</p> <p>19 I -- I failed Michele miserably, and I deeply regret</p> <p>20 that.</p> <p>21 MR. BEARD: While you're looking,</p> <p>22 two-minute break?</p> <p>23 MR. LEMOINE: Sure.</p> <p>24 THE VIDEOGRAPHER: And we're going off the</p> <p>25 record at 3:27.</p>

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1 (Break taken from 3:27 p.m. to 3:37 p.m.)
2 THE VIDEOGRAPHER: And we're back on the
3 record for the beginning of disc number 5. The time is
4 3:37.

5 Q. (BY MR. LEMOINE) Mr. Mignogna, I'm going to
6 show you what I've premarked as Exhibit 9. And you can
7 put that in the binder or keep it in front of you, it's
8 up to you.

9 A. My name has an additional G in it, but --

10 Q. Oh, I'm sorry.

11 A. -- people have missed it for a long, long time,
12 so it doesn't matter at all.

13 Q. My -- my apologies.

14 A. No, no worries. I just wanted to let you know.

15 Q. So I put together the timeline just to kind of
16 show start to finish -- or not start to finish, but
17 start -- you would agree with me that this firestorm
18 kind of kicks off on January 16, 2019, right?

19 A. Yes, sir.

20 Q. And then by January 19, 2019 is when the
21 GoFundMe announcement occurs?

22 A. I'm sorry?

23 Q. I'm sorry, February 19th --

24 A. Oh.

25 Q. -- is when the GoFundMe occurs?

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1 A. If you say so. I don't remember dates, like,
2 specifically, but, yes.

3 Q. Okay. And then along the way, you are losing
4 convention invites, would you agree with that?

5 A. Yes, sir.

6 Q. Was there any other business besides
7 invitations to cons that you lost, that you can point
8 to?

9 A. Well, I mean, the -- there were at least seven
10 or eight recurring roles at Funimation that I had been
11 playing for many, many years, I lost those, and any
12 future recording sessions of those shows. I lost the
13 recurring character that I was playing for Rooster
14 Teeth. And I'm sure there are, you know, other
15 repercussions, you know, ripples that I might even never
16 know about.

17 Q. And the Rooster Teeth termination, we don't
18 know why that occurred, we just know it occurred,
19 correct?

20 A. Yes, sir.

21 Q. And then the Funimation termination, we don't
22 know why that occurred either?

23 A. Well, we can only assume, based on the -- the
24 three stories that -- the three incidents that Tammi --
25 Tammi?

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14 Q. Now, were there allegations floating around
15 after January 16, 2019 that you were a pedophile?

16 A. Well, people have been throwing that word
17 around for, you know --

18 Q. For -- for what?

19 A. Well, just for a while.

20 Q. About you?

21 A. Yes.

22 Q. For how long?

23 A. I don't know.

24 Q. I mean, when's the first time you can recall --

25 A. I don't recall. Like I said, there are people

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1 out there that see me hugging someone for a photo in
2 front of 300 other people and 25 video cameras, it's
3 purely for the photo, and they -- and they decide
4 somehow that I'm a pedophile. There is no evidence of
5 that. There's no proof of it. There are no charges.
6 There are no convictions. It's just salacious.

7 Q. Have any of the Defendants, to your knowledge,
8 ever accused you of being a pedophile?

9 A. Not to my knowledge.

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<p>1</p>	<p style="text-align: right;">217</p> <p>18 Q. Are there any conventions that you can point 19 to, as you sit here today, that you had an actual 20 contract with that were terminated as a result of this 21 firestorm? 22 A. Yes. 23 Q. All right. Which ones are they? 24 A. Phoenix Comicon. I'm fairly certain I had a 25 contract with a couple of Informa shows. And my</p>
	<p style="text-align: right;">220</p> <p>1 understanding is that Informa told my agent that -- that 2 one of their sponsors put pressure on them to cancel me. 3 I do not know for a fact, but one of their sponsors, a 4 big sponsor, is Funimation. So, you know, it would seem 5 possible to me that Funimation put pressure on Informa 6 to drop me from the shows that I was scheduled for. 7 That would be Megacon, Fan Expo Toronto, Dallas Comicon. 8 I think those are the -- the three that come to mind. 9 Q. All right. But you don't have -- no one has 10 ever told you that it was something that Funimation did 11 that caused you to lose those? 12 A. No one used the word Funimation, no. 13 Q. All right. Did those -- 14 A. I might look into it a little further, though. 15 Q. All right. Did any of those -- in this 16 conversation, did anyone tell you that it was anything 17 that the three individual Defendants said or did that 18 caused you to lose those -- those cons? 19 A. Kameha Con did. 20 Q. But we've established you got to go to Kameha 21 Con, right? 22 A. Only after a great deal of back and forth. I 23 was originally canceled, even though I had a contract, 24 because of -- of -- of pressure put on by them and 25 threats.</p>

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1 I have also been told, again, I don't know
2 specifics, not yet anyway, that there are other events
3 that the Defendants have contacted and encouraged not to
4 have me, or said they weren't going to come and they
5 were going to try to get their other voice actor friends
6 not to come if I was there.

7 Q. And who told you that?

8 A. I don't recall at the time. I don't recall
9 right now.

10 Q. Do you know what cons that they allegedly --
11 the individual --

12 A. Not as -- not as I sit here today, sir.

13 Q. Do you have any written evidence, emails, text
14 messages, anything?

15 A. Not yet.

16 Q. When did you first start doing voice work for
17 anime films?

18 A. If memory serves, maybe 2000. Maybe 2000,
19 2001. I started in Houston with ADV Films and then
20 sometime a few years after that, which is, by the way,
21 where Monica began, that's how I knew her, and then a
22 few years after that, I met people from Funimation who
23 encouraged me to -- asked me if I wanted to play a role
24 in certain things they were doing, and that's how I
25 ended up starting to work at Funimation.

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1 Q. When would you say your reputation in the voice
2 acting community was at its peak?

3 A. I can't answer that. I don't know. I'm not --
4 it's not for me to say when it's at a peak. I don't
5 know.

6 Q. Well, you don't kind of intuitively know when
7 you're getting invited to more cons and getting asked to
8 do more shows?

9 A. There's an ebb and flow to it all.

10 Q. When did you first start doing the Broly voice
11 for Dragon Ball Z?

12 A. About 15 years ago.

13 Q. Is that the most famous character that you've
14 done?

15 A. No, sir.

16 Q. What's the most famous character?

17 A. Probably Edward Elric from Fullmetal Alchemist.

18 Q. When was the last Fullmetal Alchemist?

19 A. Full -- I'm sorry. Sorry. Fullmetal ended,
20 wow, roughly 10 years ago.

21 Q. And you've also done the voice characters on
22 video games; is that correct?

23 A. Yes, sir.

24 Q. What video games?

25 A. Oh, wow. Soul Calibur, Persona, Sonic, Final

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1 Fantasy, a large number. I kind of just don't even keep
2 track anymore.

3 Q. When you go to these cons, do you usually do
4 panels by yourself or are you with people?

5 A. Both.

6 Q. Is it unusual for you to do a panel by
7 yourself?

8 A. No. But it's also not unusual to do them with
9 others.

10 Q. And what about most recently when you were in
11 Ireland, did you do panels by yourself or with others?

12 A. I paneled -- I did panels by myself. Often,
13 I'll do a -- often, I'll do a panel on a particular
14 show, and if there are other voice actors there that
15 were part of that show, you know, we'll do a Fullmetal
16 panel with me or Kaitlyn and -- and Aaron. Or if there
17 are multiple people that are at the convention who were
18 in that show, or if it's a Dragon Ball panel, you know,
19 we would do a panel if there are multiple voice actors
20 there from Dragon Ball.

21 Q. How many cons have you done in 2019?

22 A. Nine, thus far.

23 Q. Do you typically average between 30 and 40 a
24 year?

25 A. No, I -- I think I average closer to 20 or 30.

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1 I had a pretty large number lined up for this year. I
2 can only assume because of -- of the Broly movie. He's
3 a pretty popular Dragon Ball character, and I've played
4 him in all the anime and video games, Dragon Ball video
5 games for 15 years. So it was kind of exciting when
6 they came out with a new movie that he was the main
7 character of. And it's apparently done very, very well.

8 Q. Would you agree with me that if you read the
9 articles that were being written about you that are
10 reflected in Exhibits 1 through 8, and you were at
11 convention, on or around convention, that that would
12 give you pause to invite you to conventions?

13 A. Some yes, some no. I've spoken to convention
14 organizers who come down on both sides of it.

15 Q. So there's some conventions out there that
16 aren't concerned at all about the allegations against
17 you?

18 A. There's some.

19 Q. All right. And then there's others that are?

20 A. Certainly. And if I may say, I hope this is
21 okay, but if I -- I mean --

22 MR. BEARD: Go ahead.

23 A. A convention organizer may be on the fence,
24 based on rumor and social media, but if a voice actress
25 in the industry or a voice actor in the industry calls

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1 up and -- and puts pressure or -- or a -- an animation
2 company like Funimation or Rooster Teeth calls up and
3 puts pressure on a convention, you know, they can
4 certainly sway the conventions having me.

5 Q. (BY MR. LEMOINE) All right. As you sit here
6 today, you don't know of any instances where Funimation
7 or Rooster Teeth put pressure on a convention not to
8 hire you or allow you to come, do you?

9 A. Not yet.

10 Q. All right. And other than Kameha Con, are you
11 aware of any other conventions that any of the
12 individual Defendants reached out to that chose not to
13 let you come, or cancelled the contract with you?

14 A. You know, Sean, I'm thinking now there was one,
15 and I can't remember the name. Can I have a second?

16 Q. Sure.

17 A. No, I don't yet have any specific information
18 to that effect.

19 Q. Are you familiar with a website called
20 prettyuglyliar.net?

21 A. I've heard of it.

22 Q. Have you ever gone on and looked at it?

23 A. No, sir.

24 Q. Why not? Well, take it -- let me strike that.
25 What have you heard about it?

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1 A. I'm sorry?

2 Q. What have you heard about it?

3 A. I have heard that it's just a repository for
4 garbage.

5 Q. About who?

6 A. Anybody. You. I mean, anybody. No one.
7 Anybody. Anything salacious, anything people desperate
8 to know about other people might want to read.

9

4 Q. Would you agree with me that this issue of you
5 kissing young girls and that being kind of creepy has
6 been around for a while?

7 A. No, sir.

8 Q. Something that just started?

9 A. No, I wouldn't agree that it was kind of
10 creepy, that part of your sentence.

11 Q. All right. How about we do it this way: Would
12 you agree with me that people online have commented that
13 it's creepy that you kiss young girls?

14 A. Sure.

15 Q. And that's been around for a while?

16 A. Yes, sir.

17 Q. And that's certainly impacted your personal
18 reputation, hasn't it?

19 A. Not much. I mean, I -- I was doing pretty well
20 in the industry, as you pointed out yourself at the
21 beginning of the deposition. I have done hundreds of
22 characters. I've -- I'm just saying I have been a voice
23 actor at Funimation and been hired repeatedly for 15
24 years, and --

25 Q. And it all started on April 16th, 2019, when

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1 that tweet went out?
2 A. April?
3 Q. I'm sorry, January 2016.
4 A. No. No. Like I said, my belief is that --
5 that that date was chosen to piggyback on the popularity
6 of the Broly movie. There has been a recurring theme
7 here. Over the years, any time I am announced as part
8 of a new, big new show or playing a role, there are
9 always a handful of people that want to jump on that
10 publicity and -- and get some attention for themselves.
11 Q. And -- and by get attention to themselves, you
12 mean people post anonymously that you -- you harass
13 people or do inappropriate things?
14 A. Yes.
15 Q. And so they want to get attention for
16 themselves --
17 A. Yes.
18 Q. -- through an anonymous avatar, I guess?
19 A. Yes. For the same reason they don't want to be
20 listed right now, because they want the attention, they
21 want people to click on, ooh, I like your post, and, oh,
22 look how many people liked my post, but they don't --
23 you know, they certainly don't want the accountability.
24 And whenever any supporters have been pressed for any
25 evidence or substance, well, a friend told me that they

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1 heard from a friend, who saw a friend who said that they
2 heard at a convention four years ago, etc., etc.
3 Q. And so the people that have come out and
4 actively accused you of things, you've sued?
5 A. I'm sorry?
6 Q. The people that have come out with evidence and
7 said, this is my testimony and this is what happened,
8 you've sued them?
9 A. What evidence would that be?
10 MR. LEMOINE: Objection, nonresponsive.
11 Q. (BY MR. LEMOINE) Isn't it true that you --
12 well, let me back up.
13 Your complaint is that people don't offer
14 evidence, right? They just say things anonymously,
15 fair?
16 A. Some people.
17 Q. All right. And some people actually come out,
18 use their name and make statements about things that
19 you've done that they think were inappropriate, right?
20 A. Yes.
21 Q. And you've sued at least two of them, two women
22 that allege that you did inappropriate things to them,
23 correct?
24 A. Yes.
25 Q. All right. You haven't sued any of the

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1 magazines or online articles that wrote articles using
2 all of these anonymous names?
3 A. Not yet.
4 Q. You're planning on doing that?
5 A. Possibly.
6 Q. You would agree with me that if you don't sue
7 those magazines, your reputation is still going to be
8 damaged because you'll never --
9 A. Oh, I would say my reputation has been
10 irreparably damaged.
11 Q. And because of those articles, correct?
12 A. No, sir, because of everything. All of it.
13 It's a cumulative thing. Didn't you use -- like the
14 term you used, death by a thousand cuts, you know.
15 (Exhibit 18 marked.)

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<p>16 Q. What -- what current model -- what's your phone</p> <p>17 that you use?</p> <p>18 A. iPhone.</p> <p>19 Q. An iPhone. Do you know what model it is?</p> <p>20 A. It's the X, the 10.</p> <p>21 Q. Okay.</p> <p>22 A. Yes, sir.</p> <p>23 Q. How long have you had that phone?</p> <p>24 A. A couple of months, I think.</p> <p>25 Q. Okay. So since what, March, April?</p>	
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<p>1 A. Maybe. Maybe. Maybe.</p> <p>2 Q. Okay. What was your prior phone that you had?</p> <p>3 A. iPhone 9.</p> <p>4 Q. Okay.</p> <p>5 A. I've had every version of them.</p> <p>6 Q. Did you keep the iPhone 9 when you upgraded to</p> <p>7 the 10?</p> <p>8 A. I sold it or I was -- I intended to sell it.</p> <p>9 Q. Okay. Did your text messages, to the extent</p> <p>10 any hadn't been deleted as part of your -- what you</p> <p>11 testified about earlier, were those transferred to your</p> <p>12 new iPhone, your text message conversations?</p> <p>13 A. I -- I assume so. You know how you do the --</p> <p>14 you do the backup --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- and then when you buy the new phone, you --</p> <p>17 the first thing you tell it to do is restore from</p> <p>18 backup.</p> <p>19 Q. Right.</p> <p>20 A. But as I mentioned earlier with -- with the</p> <p>21 other gentleman, I -- I don't like to scroll through 55</p> <p>22 text message conversations. Once a conversation is</p> <p>23 over, I'll get rid of it so it's easier to find the ones</p> <p>24 that are current and ongoing.</p> <p>25</p>	

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<p>15 Q. And so I understand from your earlier</p> <p>16 testimony, for some of those conventions you actually</p> <p>17 had a written contract, fair?</p> <p>18 A. Not back then.</p> <p>19 Q. I'm talking about in January 2019 --</p> <p>20 A. Yes, sir.</p> <p>21 Q. -- until today.</p> <p>22 A. Yes, sir.</p> <p>23 Q. Fair?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You had a contract with many of them?</p>	271
	<p style="text-align: right;">272</p> <p>1 on January 30th, 2019, are you referring to a text</p> <p>2 message, an email or a phone call?</p> <p>3 A. Anime NYC emailed me.</p> <p>4 And what were the other ones you mentioned,</p> <p>5 sir?</p> <p>6 Q. Anime Milwaukee.</p> <p>7 A. Anime Milwaukee? I honestly don't remember</p> <p>8 whether they called me or sent me an email.</p> <p>9 Q. Do you know whether you were signed up or</p> <p>10 slated to appear at Anime Milwaukee as of January 30th,</p> <p>11 2019?</p> <p>12 A. I can -- I can -- I can check my schedule. If</p> <p>13 I was canceled, I can only assume that I was scheduled</p> <p>14 to go.</p> <p>15 Q. And in terms of the person who would have the</p> <p>16 records of being scheduled and being canceled by a</p> <p>17 particular convention, that would be you?</p> <p>18 A. Yes -- well, for Anime Milwaukee, yes, sir.</p> <p>19 Q. Which ones did this gentleman, Gary Hassen,</p> <p>20 handle for you?</p> <p>21 A. Gary Hassen only handled the pop culture</p> <p>22 events, like a multi-genre event. I -- I -- he -- I --</p> <p>23 I never wanted him to involve himself with the</p> <p>24 anime-specific conventions, mostly because it's a</p> <p>25 different -- it's a completely different dynamic, and I</p>

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1 had an ongoing long relationship with a lot of the
2 organizers myself, and --

3 Q. Fair. I take it within a -- you've testified
4 that within a few days of your conversation on the
5 telephone with Ms. Denbow, you had a further
6 conversation with the folks at Funimation, where they
7 communicated to you that they were terminating your
8 relationship, fair?

9 A. No, sir. I did not speak with Funimation. A
10 couple of days after my initial conversation with Ms.
11 Denbow, she called me back, and there was someone else
12 on the line, a gentleman. I -- I don't remember his
13 name. And they were the ones on the phone that informed
14 me that my employment with Funimation was terminated.

15 Q. Was Karen Micah on the phone?

16 A. Maybe. Possibly.

17 Q. Was Zack Hall from Sony on the phone?

18 A. I don't remember the names.

19 Q. What do you recall about what they told you?

20 A. They told me, quote, We have finished reviewing
21 the -- the situation and concluded that your
22 termination -- your employment with Funimation is
23 terminated, effective immediately.

24 Q. Now, you said employment. At the time, you had
25 an independent contractor agreement with Funimation; is

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1 that relate to the social media uproar that we've been
2 talking about today; is that fair?

3 A. Yes, sir.
4

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1 that right?

2 A. Yes, sir.

3 Q. You weren't like a W-2 employee where they
4 provided you benefits; you got paid by the hour --

5 A. Yes, sir.

6 Q. -- for your voice acting, fair?

7 A. Yes, sir. Sorry.

8 Q. And then did Funimation make any public
9 statement at the time that it terminated you?

10 A. No, sir. In fact, as I mentioned earlier, they
11 told me on the phone that they had no intention of
12 making any public statement, and I didn't either.

13 Q. Did you, thereafter, make any public statements
14 about the social media uproar situation that was going
15 on?

16 A. Relating to what specifically?

17 Q. Relating to Funimation's termination of the
18 relationship.

19 A. No, sir.

20 Q. Did you --

21 A. I was rather ashamed. I was embarrassed.

22 Q. Got it. You have a personal Twitter account, I
23 take it?

24 A. Yes, sir.

25 Q. And you, from time to time, have issued tweets

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277	<p>1 Q. There's nothing untrue about that.</p> <p>2 A. I can't speak to what Funimation's core mission</p> <p>3 is. I mean, only Funimation can do that.</p> <p>4 Q. Okay. Fair. Do you -- do you share that core</p> <p>5 mission yourself?</p> <p>6 A. Absolutely.</p> <p>7 Q. And with respect to the second sentence of the</p> <p>8 next tweet, which I think is clarified at the bottom,</p> <p>9 Funimation makes the statement, we do not condone any</p> <p>10 kind of harassment or threatening behavior being</p> <p>11 directed at anyone. Do you see that?</p> <p>12 A. Yes, sir.</p> <p>13 Q. They don't mention Vic Mignogna in that</p> <p>14 sentence at all, do they?</p> <p>15 A. No, sir.</p> <p>16 Q. And what your argument is, that you must infer</p> <p>17 that they're referring to your conduct, fair?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Now, is this the only public statement that</p> <p>20 Funimation has made about the Vic Mignogna situation,</p> <p>21 that you're aware of?</p> <p>22 A. As far as I know, yes.</p> <p>23 Q. Certainly, from February 11th, 2019 to today,</p> <p>24 there have not been any other tweets by Funimation --</p> <p>25 A. No, sir.</p>
<p>2 Q. Let me ask you, let's look at Exhibit 7. It</p> <p>3 should be in that notebook in front of you. Is that the</p> <p>4 February 11 Funimation tweet, Exhibit 7?</p> <p>5 A. Yes, sir. Yes, sir.</p> <p>6 Q. Does Funimation, anywhere in that Twitter</p> <p>7 thread, use the word sexual?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you know whether Funimation condones any</p> <p>10 kind of harassment or threatening behavior being</p> <p>11 directed at anyone?</p> <p>12 A. I don't know. I would -- I don't know.</p> <p>13 Q. I think you testified earlier that with respect</p> <p>14 to the -- the first tweet on this page, Exhibit 7,</p> <p>15 there's nothing untrue about that particular statement,</p> <p>16 fair?</p> <p>17 A. Yes, that was just a statement of fact, that I</p> <p>18 had been recast in that show.</p> <p>19 Q. And then looking at the subsequent tweets, you</p> <p>20 would agree with me that there's nothing untrue about</p> <p>21 the following statement, part of our core mission is to</p> <p>22 celebrate the diversity of the anime community and to</p> <p>23 share our love for this genre and its positive impact on</p> <p>24 all, fair? Nothing untrue about that?</p> <p>25 A. Nothing what about it?</p>	279
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	<p>1 Q. -- that you're aware of, fair?</p> <p>2 A. No, sir.</p> <p>3 Q. I just have a few follow-up questions here and</p> <p>4 I think we can wrap this up. If a particular convention</p> <p>5 terminated you before February 11th, 2019, you would</p> <p>6 have to agree that that -- that particular convention</p> <p>7 did not terminate you because of Funimation's tweet,</p> <p>8 fair?</p> <p>9 A. Not necessarily.</p> <p>10 Q. Why do you say that?</p> <p>11 A. Well, if someone from Funimation privately</p> <p>12 contacted a convention and said, we're not going to</p> <p>13 sponsor your show if you have this guy, and then the</p> <p>14 convention contacts me and says, we're not having you;</p> <p>15 now, I don't know that that happened, but I don't know</p> <p>16 that it didn't, so not necessarily.</p> <p>17 Q. Well, assuming that didn't happen and the only</p> <p>18 public statement by Funimation about its termination of</p> <p>19 you is this February 11th tweet, then Funimation's</p> <p>20 communication could not have caused a termination of a</p> <p>21 convention that -- that occurred to you before</p> <p>22 February 11th, fair?</p> <p>23 A. No, I'm not going to assume that that didn't</p> <p>24 happen.</p> <p>25 Q. Do you have any personal knowledge of any such</p>

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1 event occurring?

2 A. Not yet, but I -- I have been -- as I mentioned
3 earlier, I -- I have heard rumblings from the convention
4 community and organizers and my -- and Gary Hassen that
5 a sponsor, a large sponsor, who was fostering
6 relationship with one of the large convention organizers
7 put enormous pressure on the conventions not to have me.

8 Q. Is --

9 MR. BEARD: John?

10 MR. VOLNEY: Yes.

11 MR. BEARD: I don't think he understood the
12 question. If I could jump in.

13 He's asking did the tweet itself, just the
14 tweet, cause any damage before it was sent out?

15 MR. VOLNEY: Right.

16 THE WITNESS: No, I thought -- no --

17 Q. (BY MR. VOLNEY) Yeah, okay, so let me back up
18 because it was a long question. It was a long question.

19 A. I thought you asked me if Funimation couldn't
20 have had any involvement before the tweet, and my answer
21 is, sure they could, privately, in closed back channels.

22 Q. Right. But in terms of what you know, you
23 don't know any specific conduct by Funimation that
24 occurred privately in back channels to somehow stymie
25 you from getting a convention job or keeping a

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1 convention job, fair?

2 A. We -- I'm so sorry, John, please say it again.

3 Q. It sounds to me like you've heard rumors or
4 you've made assumptions that Funimation may have done
5 something privately as a sponsor of a convention to get
6 you canceled, fair?

7 A. Yes, sir.

8 Q. Other than rumors, do you have any other
9 evidence of that sort of behavior by Funimation?
10

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<p>24 MR. VOLNEY: Okay. Those are all the 25 questions I have. Thank you.</p>	<p>CHANGES AND SIGNATURE</p> <p>WITNESS NAME: VICTOR MIGNOGNA DATE: JUNE 26, 2019</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>PAGE LINE</th><th>CHANGE</th><th>REASON</th></tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	PAGE LINE	CHANGE	REASON																																																															
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<p>THE WITNESS: Thank you, John. MR. LEMOINE: Nothing further. MR. JOHNSON: We'll reserve. MR. BEARD: Pass the witness. You're done. THE VIDEOGRAPHER: And we're going off the record at 5:39 p.m. (Deposition concluded at 5:39 p.m.)</p>	<p>I, VICTOR MIGNOGNA, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.</p> <p>_____</p> <p>VICTOR MIGNOGNA</p> <p>THE STATE OF _____)</p> <p>COUNTY OF _____)</p> <p>Before me, _____, on this day personally appeared VICTOR MIGNOGNA, known to me (or proved to me under oath or through _____) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.</p> <p>Given under my hand and seal of office this _____ day of _____, _____. NOTARY PUBLIC IN AND FOR THE STATE OF _____ COMMISSION EXPIRES: _____</p>																																																																		

DEPOSITION OF VICTOR MIGNOGNA
June 26, 2019

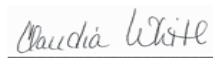

<p style="text-align: right;">289</p> <p>1 NO. 141-307474-19 2 VICTOR MIGNOGNA,) IN THE DISTRICT COURT 3) 4 Plaintiff,) 5) 6 VS.) TARRANT COUNTY, TEXAS 7) 8 FUNIMATION PRODUCTIONS,) 9 LLC, JAMIE MARCHI, MONICA) 10 RIAL, and RONALD TOYE,) 11) 12 Defendants.) 141st JUDICIAL DISTRICT 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">REPORTER'S CERTIFICATION DEPOSITION OF VICTOR MIGNOGNA JUNE 26, 2019</p> <p>I, Claudia White, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:</p> <p>That the witness, VICTOR MIGNOGNA, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;</p> <p>That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature and return to CSI Global Deposition Services by _____;</p> <p>That the amount of time used by each party at the deposition is as follows:</p> <p>Mr. Ty Beard, Esq. - 00 HOURS:00 MINUTE(S) Mr. J. Sean Lemoine, Esq. - 03 HOURS:40 MINUTE(S) Mr. Sam Johnson, Esq. - 00 HOURS:30 MINUTE(S) Mr. John Volney, Esq. - 00 HOURS:30 MINUTE(S) That pursuant to information given to the</p>	<p style="text-align: right;">291</p> <p>1 FURTHER CERTIFICATION UNDER RULE 203 TRCP 2 The original deposition was/was not returned to the 3 deposition officer on _____; 4 If returned, the attached Changes and Signature 5 page contains any changes and the reasons therefor; 6 If returned, the original deposition was delivered 7 to Mr. Sean Lemoine, Custodial Attorney; 8 That \$ _____ is the deposition officer's 9 charges to the Defendants for preparing the original 10 deposition transcript and any copies of exhibits; 11 That the deposition was delivered in accordance 12 with Rule 203.3, and that a copy of this certificate was 13 served on all parties shown herein on and filed with the 14 Clerk. 15 Certified to by me this _____ day of 16 _____, 2019. 17 18 19 20 21 22 23 24 25</p> <div style="text-align: right;"> _____ Claudia White Texas CSR #8242 Expiration Date: 5/31/21 Firm Registration No. 526 CSI Global Deposition Services 4950 N. O'Connor Road, Suite 152 Irving, Texas 75062 (877) 784-0004 fax (972) 650-0225 production@courtroomsciences.com</div>
<p style="text-align: right;">290</p> <p>1 Deposition officer at the time said testimony was taken, 2 the following includes counsel for all parties of 3 record: 4 Mr. Ty Beard, Esq., Attorney for Plaintiff 5 Mr. J. Sean Lemoine, Esq., Attorney for Defendant 6 Monica Rial and Ronald Toye 7 Mr. Sam Johnson, Esq., Attorney for Defendant 8 Jamie Marchi 9 Mr. John Volney, Esq., Attorney for Defendant 10 Funimation 11 I further certify that I am neither counsel for, 12 related to, nor employed by any of the parties or 13 attorneys in the action in which this proceeding was 14 taken, and further that I am not financially or 15 otherwise interested in the outcome of the action. 16 Further certification requirements pursuant to Rule 17 203 of TRCP will be certified to after they have 18 occurred. 19 Certified to by me this 1st day of July, 2019. 20 21 22 23 24 25</p> <div style="text-align: right;"> _____ Claudia White, Texas CSR #8242 Expiration Date: 5/31/21 Firm Registration No. 526 CSI Global Deposition Services 4950 N. O'Connor Road, Suite 152 Irving, Texas 75062 (877) 784-0004 fax (972) 650-0225 production@courtroomsciences.com</div>	

EXHIBIT B

Vic Mignogna Timeline

[Vic] "a homophobic rude asshole who has been creepy to underage female fans for over ten years"

1-16-19
Pet. ¶ 15

Polygon
"In addition to the sexual harassment claims, Mignogna's alleged homophobic behavior remains a concern with anime fans"

1-25-19
Depo. Ex. 2

Anime News Network
"making unwanted physical advances on female con-goers"

1-30-19
Depo. Ex. 4

DAO Dragonball
"over 100 independent allegations surfaced, dating back to 2003"

2-1-19
Depo. Ex. 5

RoosterTeeth
Termination
Tweet
2-5-19
Depo. Ex. 6

Funimation
Tweet
2-11-19
Depo. Ex. 7

Gizmodo
"asked not to be named in fear of retaliation from Mignogna or his fanbase"

2-19-19
Depo. Ex. 8

Go Fund Me
N. Rekieta
\$\$\$

2-19-19
Depo. Ex. 11

Phoenix Con
1-18-19
Pet. ¶ 20

Anime NY Con
Anime Milw Con
1-30-19
Pet. ¶ 22

Kawaii Con
2-1-19
Pet. ¶ 23

Ancient City
Con
2-3-19
Pet. ¶ 25

Denver Con
2-4-19
Pet. ¶ 26

Florida Con
Realiegh Con
Kamicon
Hudson Valley Con
2-5 to 2-6-19
Pet. ¶ 27

EXHIBIT C

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

V.

**FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI**

Defendants.

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IN THE DISTRICT COURT

141st JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

DECLARATION OF J. SEAN LEMOINE

1. I am a partner with the law firm of Wick Phillips Gould & Martin, LLP (“Wick Phillips”).

2. I am of sound mind, competent and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

3. I am an attorney at law duly admitted and licensed to practice before the courts of the State of Texas. I was so licensed in November 2000. My practice is based out of the DFW Metroplex, which includes Dallas County, Tarrant County, and Collin County, Texas (and has been so for my entire career). I represent Monica Rial and Ronald Toye (the above captioned Defendants) identified as the “Moving Defendants” in their Motion to Determine the Scope of Anti-SLAPP Stay, or Alternatively for Leave to Conduct Discovery (the “Motion”).

4. As an unfortunate result of this lawsuit, I have come to learn of an individual named Nick Rekieta (“Rekieta”), who is a lawyer licensed to practice in the State of Minnesota for about four years. As described in the Motion, Rekieta has inserted himself into this litigation, and is a fact witness based on his own actions, including setting up and promoting the “GFM War Chest” (defined in the Motion).

5. On May 31, 2019, Rekieta conducted a YouTube show located online at <https://www.youtube.com/watch?v=tdLIPOqHNKE> that discussed a hearing before the Honorable John Chupp (presiding judge in this matter) regarding confidentiality concerns of depositions and witnesses. During the show Rekieta made the implicit threat that the identity of any potential witness against Plaintiff Vic Mignogna became available their personal information would be exposed on the internet, and that Rekieta would view it as a real “**shame**” if the witness’s employers were somehow contacted.

6. The following is a rough transcription of Rekieta’s comments, starting around the 17:00 minute mark:

“Hey Pretty Ugly Little Liars. I know you’re watching even though you’re never ever understanding. But, just in case you don’t realize what that means. Is that if any of your identities are discerned by the court...it might not even be me. It might be Casey leaking them to Shane that makes them public. That would be a real shame. That would be a real shame. If uh like your workplace, like let’s say there was someone who emailed a convention or a signing event or something, and it was easy to ascertain where they worked. Like imagine what happens when that person who goes out and lies about someone to get their job ruined, that person’s email and workplace gets exposed to the internet. I just...it’s the weirdest thing on earth that they would ask for this.”

7. On July 3, 2019, Rekieta conducted another YouTube show located online at <https://www.youtube.com/watch?v=-ZeKhCntC8o&t=9396s> that focused on the deposition sought by Moving Defendants, and the Motion to Quash filed by Plaintiff to stop Rekieta’s deposition.

8. In the July 3 video Rekieta:
- a. referred to me as a “smug piece of trash” (between the 2:14 and 2:17 mark)
 - b. announced he was already unavailable for deposition on August 2, 2019 (and noted it would be difficult for him to be deposed because he has children);
 - c. would openly oppose his deposition;

d. self-declared any information he might have as irrelevant;

e. directed me to “earn it bitch” in response to obtaining his deposition;

f. and noted he had no interest in complying with a deposition notice because “all of you are scum.”

9. It is unclear who the “all of you” refers to, but I believe that he means myself and my co-counsel.

10. Between the 2:36 and 2:37 mark of the July 3 video, Rekieta indicates that he intends to make me “earn the right to do this deposition.”

11. I have never met nor spoken to Rekieta.

12. On July 4, 2019, Rekieta did another live-stream on his YouTube channel, found online at <https://www.youtube.com/watch?v=EIDKxTZM6L4>. In the July 4 video, Rekieta actively promoted (starting around the 44:00 minute mark) obtaining additional funding for the Plaintiff through the GFM War Chest to “make [Moving Defendants] mad.”

13. Around the 46:00 minute mark, one of his anonymous guests (“yellowflash”) commented that he would like for Rekieta to raise enough money to sue (and apparently put a lien on the car of) a woman that goes by “Mars girl.” The following is a rough transcription of the comment:

“it's important that everyone know is that we need enough money in there so that we can finish these cases and then sue Mars girl if you want Mars girl gets sued we need enough money to beat Funimation and Soye and MoRonica so then we can sue Mars girl cuz he's not gonna get any money from Mars girl, the point is to just sue Mars girl and put a lien on her on her 1980s Volkswagen . . .”

14. Rekieta did immediately disclaim that he cannot guarantee that the GFM War Chest will be used to sue a specific person or publication.

15. It is obvious to me, based on how carefully Rekieta discusses the GFM War Chest, that he has read the transcript of Plaintiff’s deposition. For reasons obvious to a trial lawyer, he

does not want to discuss that deposition with his viewers.

16. As of July 9, 2019, the GFM War Chest is at \$206,170 with 6,204 people donating. Below is a screenshot (July 9, 2019) of the top half of the weblink for <https://www.gofundme.com/vic-kicks-back>



17. My name is J. Sean Lemoine. My work address is 3131 McKinney Avenue, Dallas, Texas 75204. I declare under penalty of perjury that the foregoing is true and correct, and within my personal knowledge.

Executed on July 9, 2019.

A handwritten signature in black ink, consisting of a stylized 'J' followed by a series of loops and a long horizontal stroke.

J. Sean Lemoine

[ANIME](#) [MOVIES](#) [ENTERTAINMENT](#)

Dragon Ball Super: Broly voice actor responds to sexual harassment, homophobia claims

31

Though lots of allegations began to surface recently, some go as far back as 2010

By [Petrana Radulovic](#) | [@Pet_rana](#) | Jan 25, 2019, 6:38pm EST

Exhibit 2 P. 001



Vic Mignogna attends the premiere of *Dragon Ball Super: Broly* in December 2018. | Rich Fury/Getty Images for Funimation

Anime-dub voice actor Vic Mignogna, best known for his work on *Fullmetal Alchemist*, is facing serious claims of sexual harassment and homophobia. He **released a statement earlier this week on Twitter**, responding to accusations of misconduct that started to surface on social media after the premiere of *Dragon Ball Super: Broly*, in which he voices the title character.

In the statement, Mignogna refutes the homophobia allegations outright, stating that some of his dear friends are “members of the LGBTQ community.” While several fans alleged online that he refused to sign yaoi fan art — often romantic images featuring two male characters — he suggested that he he did not want to sign non-canon material in general.

He also disputes a serious claim about his supposed anti-Semitic behavior, arguing that a joke he made about the Holocaust was just a poor choice of words.

Exhibit 2 P. 002

"Someone pointed me to a moment years ago where I was in a panel, and referred to a bunch of noise coming from another room jokingly as 'a holocaust,'" he said. "As I said then, it was a metaphor ... Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone."

Finally, he apologized for making fans uncomfortable with physical contact, including unsolicited hugs and kisses. This was among the most common type of allegation that surfaced on Twitter earlier this month, when *Broly* hit theaters.

"Never in a million years would it be my intent to make anyone feel uncomfortable," he said. "Rather, [hugging fans] was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels this way."

Mignogna said he will stop his physical interactions with fans as a result. His full statement can be found below.

1

Exhibit 2 P. 003



vic mignogna ✓
@vicmignogna



♡ 15.4K 1:45 AM - Jan 21, 2019

💬 5,408 people are talking about this



Many conventiongoers' stories continue to come out on social media, detailing times when the actor acted flirtatiously towards them (**fondling, kissing, groping**, etc.) without their consent, most while they were still underage. While these allegations are only just picking up steam, **many of them go as far back as 2010**.

In addition to the sexual harassment claims, **Mignogna's alleged homophobic behavior** remains a concern with anime fans. While he said that he refused to sign fan art in general, conventiongoers argue that he would only deny signing pictures depicting characters in gay relationships, even if the art wasn't sexually explicit, while he was happy **signing other fan art**. Organizers at conventions, meanwhile, shared stories of unprofessional behavior, such as overstaying **his panel time** and **yelling at staffers**.

As more stories surfaced, the hashtag **#KickVic** started to circulate on Twitter. **Leaked screenshots** reveal that Mignogna took to the Discord for his private fan club, the Risembool Rangers, last Saturday to encourage his fans to counter the accusations. The hashtag **#IStandWithVic** rose in response.

When Polygon reached out to Funimation, which distributes *Dragon Ball Super: Broly* and used to license *Fullmetal Alchemist*, the company declined to comment on the allegations.


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Interest

'Far From Perfect': Fans Recount Unwanted Affection from Voice Actor Vic Mignogna

posted on 2019-01-30 06:00 EST by Lynzee Loveridge

Every year, hundreds of thousands of anime fans flock to conventions, whether it's their mid-sized local con or planning a trek to Anime Expo. The reasons are just as varied as the attendees: some will spend early morning hours assembling racks and decoration for their artist alley booth, some will perfect their make-up and glue for the cosplay masquerade, and others will hop from fan panel to fan panel to learn about dubs lost to time or obscure appearances of hamburgers in anime.



For many, conventions are a weekend of fandom and freedom. Parents can drop off a small group of friends, assured that they'll get their coveted autographs and UFO catcher plushies. It's a place to laugh loudly, be unabashedly nerdy, and interact with the creators and actors in what's assumed as a safe environment. Adults and kids alike are there to check off their "must-sees" but while everyone is running off to the next panel or cosplay meet-up, who is making sure the star-struck, awkward teens are engaging with guests appropriately and vice versa? Where is the line for appropriate guest and attendee behavior and what should be done when it's crossed?

These questions came to the forefront of social media these last weeks as rumors about convention guests and staff interactions with minors stopped being whispered and instead were shouted. A Twitter thread posted on January 16 accused *dub voice actor Vic Mignogna* of homophobia, rude behavior, and most concerning, making unwanted physical advances on female con-goers. The thread quickly spread with over 4,000 retweets at the time of this writing and over 400 comments, many relaying their own negative experiences, including unwanted and unsolicited physical affection from the *Fullmetal Alchemist* voice actor. As with any claims involving a person with a moderate fan following, Mignogna's supporters were quick to attempt to discredit individuals' claims or at the very least dispute the voice actor's intentions behind kissing or hugging attendees unannounced.

I was approximately 14 years old when she attended New York Comic-Con in 2014 and met Mignogna. She described the encounter as "really, really uncomfortable." She discussed how the voice actor put his hand underneath her zip-up sweatshirt and on her waist for the initial photo. Then, thinking that the photo-taking portion was done, she was surprised when he asked her to look toward the camera again. That's when he put his face close to hers and then kissed her.

妖



REVIEW


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Jun 23, 12:0

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Jun 22, 14:0

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Jun 21, 15:0

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Jun 21, 13:0

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Exhibit 4 P. 002



J posing with Mignogna in 2014

Multiple individuals, many with friends present to corroborate, relayed their personal encounters with Mignogna with an increasingly common series of events. A fan would be in Mignogna's autograph line to get a piece of merchandise signed for a friend. Upon approaching Mignogna, they would make typical small talk before he would ask the attendee if they wanted a photo. They would agree and would unexpectedly find the voice actor kissing their cheek or pulling them in for a tight hug for the photo op. Time and again, the individuals in the picture said that the physical affection happened without their consent and made them uncomfortable. The behavior wasn't limited to one con, one person, or even one year, and for all intents and purposes seemed like a common occurrence regardless of whether the other party was a young adult or a minor. It was often done in the wide-open areas of conventions and to the cheers of crowds.



Taylor at Colossalcon in 2013

Taylor was 18 when she attended Colossalcon in Sandusky, Ohio in 2013. She was feeling ill when she got up that morning but decided to still tag along with her friend to Mignogna's autograph line. She wasn't an avid fan of Mignogna, but her friend was, so she went so her companion could get a second item signed. When it came to be their turn, Taylor said that Mignogna told her she was "adorable." She didn't think much of the statement and when he asked her if she wanted a photo she thought, "why not?" He embraced her for a photograph and when the moment was over, Taylor said he hugged her and then kissed her on the face. Onlookers cheered. Taylor, who identifies as

Exhibit 4-P-008



Hakata BD/DVD

Jun 21, 12:0

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Jun 21, 10:5

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COLUMN



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Jun 20, 14:0

Aggre:tu workplac romance, second s tone than discuss tl they liked them the

COLUMN



queer, reiterated that she felt extremely nauseated and that the entire event feels "gross" when she thinks about it.

No one seemed to be asking, Mignogna included, whether the other party was a willing participant or whether a celebrity should be making an intimate display toward an underage con-goer no matter the intention behind it. The line continued to blur as more individuals came forward, including one person who, at the age of 15, was given Mignogna's personal cellphone number after an encounter in his autograph line.

Azure was 15 years old and presenting as female when he met Mignogna at Anime Expo in 2006 in Anaheim, California. He was in the autograph line with a friend, also 15 years old, who had prepared a gift for Mignogna. Azure was dressed in cosplay, a cardboard version of Alphonse's armor from Fullmetal Alchemist. The two approached Mignogna and Azure's friend joked that Azure's costume was "sexy." Azure was surprised when Mignogna enthusiastically agreed. The group laughed it off and left the line. Later that day, they got an exclusive visit from Mignogna in the hallway. He chatted with the group, asked them how long they were visiting the con, and then mentioned his fanclub. After making the group swear they wouldn't share it, Mignogna gave them his personal cell phone number. Azure wrote it down in his Paris Hilton diary when he arrived home from Anaheim. A reverse phone records search shows that the number Azure provided belonged to Mignogna until at least 2016.



Azure's phone book

He and his friends would share several group phone calls with Mignogna. Azure said at the time that it "felt validating and cool that he was giving us the time of day and attention." According to his account, the friends and Mignogna mostly discussed voice acting and the teens would request him to repeat lines. Similar to the first time Mignogna approached the friends, Azure said he often pushed for them to join his fanclub to the point that Azure became uncomfortable. He also noticed that Mignogna never brought up the group's parents or whether they had permission to be chatting privately with a 45-year-old man.

0:00 / 0:34

Exhibit 4 P. 004

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Jun 20, 13:1

Heidi pic
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REVIEW

Jun 20, 13:0

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Mignogna is in no short supply of fans who believe in him. His fanclub, the Risembool Rangers, is unique among the anime fandom both in its longevity and the lengths its members will go to show their dedication to their favorite voice actor. Founded during the height of *Fullmetal Alchemist*'s popularity in 2005, the Yahoo! Group-turned-Discord channel maintains a full-fledged store run entirely by fanclub volunteers and allegedly "at cost" with inventory, like CDs and signed autographs, provided in part by Mignogna.

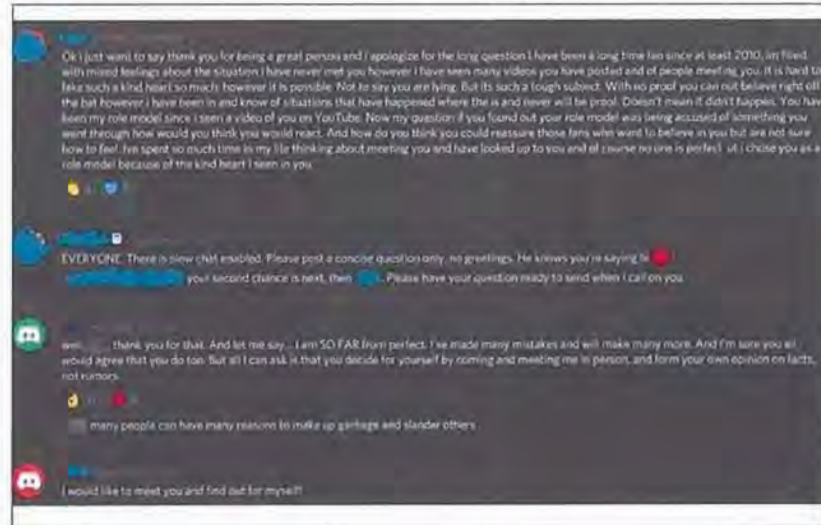
Approximately 43% of Risembool Rangers were underage in 2006. Fanclub photos retrieved by Anime News Network show a common pattern by Mignogna of kissing and closely embracing fans for photographs.

The store's responsibilities have been passed down from fanclub member to fanclub member and run entirely on a volunteer basis. One former store manager described her schedule as working her normal job from 3 a.m. to 7 a.m. and attending college courses for 11 hours while managing the fanclub store for a few hours in between classes. She then would ship all the store's orders each Friday. The former manager was reluctant to discuss the store's operations further, but another former Mignogna store manager stated that orders were taken via PayPal and the money went directly to whomever was managing the store at the time to cover their shipping costs.

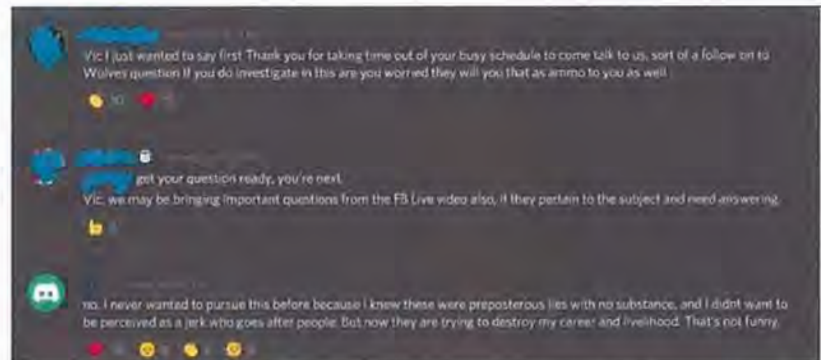
Active members in the fanclub would also volunteer as mods in the forums and busy chatroom, organize con meet-ups for members, and occasionally get to have dinner with the man himself along with other club members. These predominantly young, female members were not compensated for their time running the shop, managing the fanclub's official activities, or moderating the forum and chat. On at least one occasion, Mignogna asked panel audiences if any were members of his fanclub to specifically recruit them to manage his autograph line, CD sales, and till at a convention. That's how one 16-year-old Risembool Ranger ended up working during part of Animazement in 2008.

"With the help of my friends, we sold both his anime songs CD and his Christian CD. We also managed the line and cut it off when it got too long. We counted his money and made sure it matched the number of CDs sold even though we were not a part of the convention staff. Afterwards, we gave him a gift we made which was a sketchbook full of fan art of various characters he voiced and some candy and treats. He was super nice and appreciative during the whole thing. Then, he went around and gave everyone hugs. Some people we knew, but weren't a part of the group, joined in and he thanked them as well for just being fans of his. When he got to me, he gave me a hug as normal but thanked me specifically in an oddly seductive voice and kissed my neck before moving onto other people. Afterwards, I felt so shocked and oddly violated. Because it was such a small convention, I saw him multiple times afterwards, including in an elevator I needed to use. I was so frightened, I took the stairs. I avoided him the entire weekend. He recognized me even in different cosplay and tried to come to me. I ran away every time."

The tried and true Risembool Rangers were on hand to come to Mignogna's aid when allegations of his impropriety came to the surface. When the January 16 Twitter thread picked up steam, Mignogna turned to his fanclub's Discord channel on January 19 to assuage fans before issuing his public statement.



In response to a fan's concerns about who to believe, Mignogna writes: "I am SO FAR from perfect. I've made many mistakes and will make many more. And I'm sure you all would agree that you do too. But all I can ask is that you decide for yourself by coming and meeting me in person, and form your own opinion on facts, not rumors ... many people can have many reasons to make up garbage and slander others."



Mignogna responds to a second question by characterizing the allegations as "preposterous lies with no substance" that could potentially damage his career.

Mignogna also assured his fans that the statements being made wouldn't be seriously considered by others in the business. His claim of course, wasn't entirely baseless. Rumors about Mignogna's alleged behavior toward con-goers and supposed outbursts at fellow voice actors and con staff have been shared within insider circles for over a decade. While researching this article, I kept learning of more conventions that supposedly "blacklisted" Mignogna from ever returning. Yet, any attempts to reach out to long-time staff for each event were met with silence. If the rumors were true, no one with any kind of power in the industry was willing to talk about it.

Anime News Network reached out to Mignogna to comment in hopes of gaining more specifics about the allegations. He declined to comment and instead chose to stand by a statement he issued on January 21 where he mentions the allegations from the January 16 Twitter thread in general.

This is heartbreaking. Over the last few days, a number of comments and allegations have been voiced on social media. I'd like to share my thoughts.

Homophobic? NO! Some of my dearest friends are members of the LGBTQ community, including several that I brought into my production family on Star Trek Continues. This is a blatantly false statement. I said many years ago that I didn't think a particular character I voiced was gay, contrary to what some fans believed, not because it matters to me AT ALL, but because I was told this was the case. I also elected not to autograph Yaoi, not because I am homophobic but because I didn't wish to sign material that was not canon.

Anti-Semitic?? I couldn't even grasp where this was coming from until someone pointed me to a moment years ago where I was in a panel, and referred to a bunch of noise coming from another room jokingly as "a holocaust." As I said then, it was a metaphor for armageddon, death, and mass destruction, but not "THE Holocaust." Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone.

I sincerely apologize to any convention staff member who ever felt I was anything less than kind and grateful to be included in their event. Unknown to most staffers, contractual arrangements made in advance with cons were occasionally not honored when I arrived and that made me frustrated. That does not excuse making anyone feel badly and I am deeply sorry.

I would also like to sincerely apologize to anyone who ever felt my interaction with them (a hug or a kiss on the cheek or forehead) was crossing a line. Never in a million years would it be my intent to make anyone feel uncomfortable. Rather, it was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels the same way. Hence, I will not be interacting in the same way with fans in the future. Understand this is the climate we live in and this is how it has to be. To my fans who ask me for hugs, etc., I'm sorry, but please know that I am no less grateful to or supportive of you!

Finally, any allegations of sexual harassment, sexual assault, or most disturbingly, pedophilia are COMPLETELY AND UTTERLY FALSE. My heart weeps for anyone who endures a violation of this kind, so to be accused of harming others in this way....I have no words.

Sincerely,
-Vic Mignogna

In the statement, Mignogna compares the kissing seen in the above photos to the same kind he shares with family members and says he will no longer engage in such behavior with con-goers. He then apologizes to his fans that he will no longer be able to hug or kiss them if requested. He also denies any allegations of sexual harassment, sexual assault, pedophilia, homophobia, and/or antisemitism.



Regardless of these specific points of contention, discussion of yaoi and yuri was banned outright from the Risembool Rangers chatroom and forums. The Yahoo! Group's page states: "NO posting adult content! This too is self explanatory [sic]. Vic is a Christian and does not approve of yaoi, yuri, *hentai*, etc...if you were a fan of Vic, you would know that. We're not saying you must clean up your life because of that, just that it has no place here. End of discussion!"

A Jewish fan of Mignogna's work on *Persona 3* left his autograph line feeling judged in 2010. The 19-year-old lined up with a replica of Junpei's hat for Mignogna to sign and also grabbed a copy of his fan music CD. When their turn came, Mignogna allegedly asked them why they chose the fan music CD but not any of his Christian music CDs. The fan apologized and stated they were Jewish. According to them, Mignogna stared at them up and down and responded by saying, "Well, we can change that."

"I couldn't believe that he would say something like that to me," they said. "I wasn't trying to be rude by telling him my religion, I was just trying to answer his question. I ended up just grabbing the CD and the hat without his signature and apologized to him and just bolted out of the signing line."

One week after issuing his statement, another alleged victim came forward, a fellow talent and TV show contestant.

On January 28, prominent *cosplayer* Jessie Pridemore publicly recounted her own experience with Mignogna at Anime Next in 2011 where the voice actor allegedly grabbed her arm to keep her from leaving his side during a convention. Pridemore wrote that fans approached after he allegedly held her arm and they made small talk about a series he had appeared in. During this conversation, Pridemore claims Mignogna slid his hand up her back and through her hair before grabbing and tugging it. In her account, Pridemore wrote that he then insinuated that the reason she enjoyed the series was because of

Exhibit 4 P. 007

another *voice actor's* performance in it, a man Pridemore claims raped her and bragged about it to others in the industry.

When a friend approached to help Pridemore, she wrote that she did not respond because she was stunned. She claimed Mignogna pulled on her hair again "with the implication that if the other *voice actor* had 'had' me, he could too." She said she then left the group in tears.

Prior to Pridemore's post, little of the allegations against Mignogna made their way outside of social media and it's unknown what, if any, ramifications they might have beyond the viral tweet expiration date. He appeared at the premiere of *Funimation's Dragon Ball Super: Broly* film where he voiced the titular Broly. Individuals have tagged *Funimation* while using the hashtag #KickVic on Twitter to relay stories to the company, but any discussion about the actor himself hasn't stopped [ticket purchases](#) in the U.S. His convention booking [calendar](#) on the RiseMbool Rangers' website shows two to three convention appearances per month year round.

Despite the longevity of Mignogna's reputation and numerous first-hand accounts of unwanted physical contact between the *voice actor* and attendees, any kind of repercussions were left to internal memos and insider discussions. Conversations that the attendees manning their Artist Alley booths, *cosplayers* practicing their skits, and gaggles of teenage fans waiting in line for a *Vic Mignogna* autograph would never overhear.

Additional reporting by Bamboo Dong

All the stories included in this article were corroborated by multiple sources with the exception of the Persona 3 fan.





Images were provided by the respective sources, shared via the RiseMbool Rangers fan club, or from Vic Mignogna's professional [website](#).

Anime News Network reached out to multiple convention staff and industry staff members, former and current, and voice acting talent but did not receive responses by press time.

If you're a victim of sexual assault and need help, please call RAINN at 800.656.HOPE (4673) to be connected with a trained staff member from a sexual assault service provider in your area. Your call will be confidential. You can also visit the [RAINN website](#) for other resources and an online chat.

Update: This article is updated for better clarity and to further protect the identities of the individuals in the photos. A previous version of this article published on January 30 included a photo of a minor being kissed on the cheek by *Vic Mignogna*. The photo and two other photos showing similar behavior were used in the article to illustrate the commonality of such posing by Mignogna with female fans, some underage. *Anime News Network* at no time claimed those photos were examples of non-consent by the subjects. Due to third party mischaracterization of the photos and a request relayed from one individual in the photo, *Anime News Network* removed the fan club photographs on February 4.

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6/24/2019

'Far From Perfect': Fans Recount Unwanted Affection from Voice Actor Vic Mignogna - Interest - Anime News Network

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Fixing the Staircase: Vic Mignogna's Sexual
Assault Allegations and the Voice Actors Who
Speak Out



Vic Mignogna, the voice of Broly in *Dragon Ball Super*, has been accused of sexually assaulting women at anime conventions. In the wake of these allegations a cultural divide has formed that reflects our society as a contrast between #MeToo and #FakeNews.

One female victim alleges that around the year 2009 an unnamed voice actor and another man intoxicated her, took her up to their hotel room, and raped her. Afterward, this unnamed voice actor told Vic Mignogna that she was a "con slut," and then at subsequent conventions Vic Mignogna treated her poorly and sexually assaulted her. Yet no criminal charges have been filed and Mignogna denies the allegations.

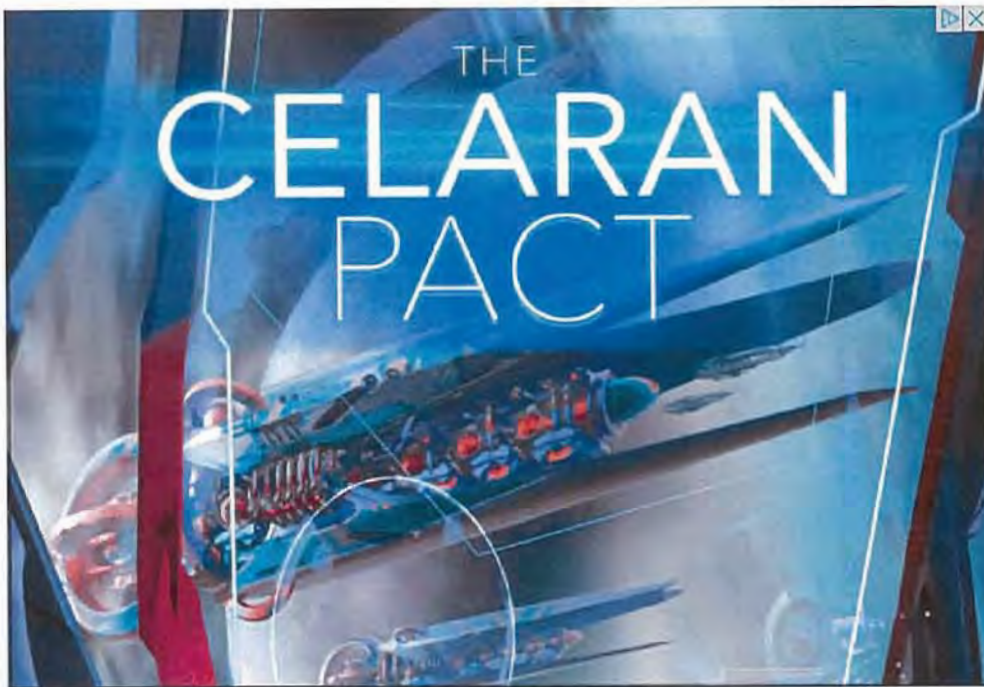
Exhibit F-2. 002

Such an allegation toward a celebrity may seem like a one-off and hard-to-believe story that perhaps is the cost of being famous. However, numerous allegations of sexual assault have shadowed Mignogna's career and continue up to today. During the research for this article, over 100 independent allegations surfaced, dating back to 2003.

These allegations are affecting Vic Mignogna's career and social life, as conventions are cancelling his appearances and fans are arguing on his social media pages. This comes right after the premiere of the box-office record-breaking film (<https://deadline.com/2019/01/dragon-ball-super-broly-opening-day-domestic-box-office-1202536491/>), *Dragon Ball Super: Broly*, where Vic plays the titular villain. The poor optics of these allegations may even lead to him losing voice acting roles, including Broly.

Are the allegations true? In this article we'll examine these allegations, hear stories from women who claim to be victims of his assault, talk to Dragon Ball voice actors and industry insiders who have worked with Mignogna, discuss the response from his primary employer FUNimation, analyze fan discussions on both sides of the spectrum, and highlight conventions that book Mignogna as a guest or ban him from attending.

This website's purpose is to record the culture and history of Dragon Ball's development and the way it influences our society. This article's subject is not about Dragon Ball's content as much as it's about the industry at large and the people that work on the series. It serves as a historical record and chronological narrative of the information that is available.



Remember that allegations are not a guarantee of guilt. No judgment is being made, nor intent to libel, and no unspoken intentions of any sort are implied.

Cultural Context

It's important to understand the cultural context that these allegations against Vic Mignogna are arising from. Sexual assault allegations in our society are a hot topic and divisive issue because of social phenomenon like the [#MeToo movement](https://en.wikipedia.org/wiki/Me_Too_movement) (https://en.wikipedia.org/wiki/Me_Too_movement), where countless people who claim to have been sexually assaulted or harassed have come forward to share their story.

Famous examples of the fallout of this movement include the Harvey Weinstein scandal, as reported (<https://www.newyorker.com/news/news-desk/from-aggressive-overtures-to-sexual-assault-harvey-weinsteins-accusers-tell-their-stories>) by Ronan Farrow, who won the 2018 Pulitzer Prize for Public Service for his efforts. Also actor Kevin Spacey (<https://www.usatoday.com/story/life/2017/11/07/kevin-spacey-scandal-complete-list-13-accusers/835739001/>), comedian Louis C.K. (<https://www.nytimes.com/2017/11/09/arts/television/louis-ck-sexual-misconduct.html>), Bill Cosby (<https://www.latimes.com/entertainment/la-et-bill-cosby-timeline-htmlstory.html>), Michigan State University gymnastics physician Larry Nassar (https://en.wikipedia.org/wiki/Larry_Nassar), and the powerful men (<http://time.com/5015204/harvey-weinstein-scandal/>) on news channels such as Roger Ailes (<https://money.cnn.com/2017/05/18/media/timeline-roger-ailes-last-year/index.html>), Bill O'Reilly (<https://www.nytimes.com/2017/10/21/business/media/bill-oreilly-sexual-harassment.html>), and Matt Lauer (https://en.wikipedia.org/wiki/Matt_Lauer#Sexual_misconduct_allegations) who have had their careers damaged or ended by victims coming forth after years of silence.

The news of these scandals spread around the country from 2017 to 2018 (<https://www.chicagotribune.com/lifestyles/ct-me-too-timeline-20171208-htmlstory.html>) and continued to rise in intensity as more and more victims added fuel to the fire with their stories (<https://metoomvmt.org/>) of frustration, fear, and loneliness. And even with this movement inspiring them to speak out, there was still the anxiety of coming forth because of the backlash of being shunned or mocked for telling their story, or for being designated as 'not smart enough' to avoid the situation that led to them being victimized. And as we discovered, it was rampant in every industry of our society.

Until now there has never been a bombshell report about a man in the anime industry using their fame and influence to manipulate women for sex. But according to recent news, one might be led to believe that Vic Mignogna is such a man.

Vic Mignogna Intro

Vic Mignogna (https://en.wikipedia.org/wiki/Vic_Mignogna) is a 56-year-old voice actor who began acting in 1999, and is most well-known for playing Edward Elric in the English dub of *Fullmetal Alchemist*, released in 2003. The success of this series launched his career into playing hundreds of roles (<https://www.imdb.com/name/nm0586003/>) in anime, cartoons, and live-action. He's also a multi-talented (<https://www.vicsworld.net/>) musician, producer, stage actor, and singer.

This same year he was hired by FUNimation Entertainment, the official licensor of Dragon Ball in the United States and other English-speaking countries, to play the role of Broly in three Dragon Ball Z films starring the character, released from 2003 – 2005.

In the following years he would perform as Broly in each of the dozens of Dragon Ball video games, right up to 2018 with the release of the megahit *Dragon Ball FighterZ*, which sold more than 3.5 million copies (http://www.pushsquare.com/news/2018/10/dragon_ball_fighterz_tops_3_5_million_sales_in_less_than_a_year) in less than a year. So throughout the course of his career, Dragon Ball fans have always associated him with the role of Broly.

But Broly is not where most of Vic's fans come from, and most of Vic's fans are not the typical young male fan of Dragon Ball. But instead, young girls.

Vic Mignogna's Fan Club

Many of the roles that Vic Mignogna plays are in shows catered to girls and children. For example, *Ouran High School Host Club* (2006), *Free! Iwatobi Swim Club* (2015), and *Digimon Adventure Tri* (2015).

Every independent actor has to build their own following through their work and through social media. Vic has created a loyal following through a website dedicated to him called the Risembool Rangers (<https://www.risemboolrangers.com/>). The Risembool Rangers are named after the fictional town of Risembool in *Fullmetal Alchemist*, and it is the hometown of the main character that Vic Mignogna plays.

Fans congregate here to buy his merchandise and to discuss Vic, his work, and Christianity. Vic is an open Christian and will often hold 'Gospel of John' panels at conventions around America, where fans come to hear him read and preach the gospel. He has a music CD where he does the same, played to piano, and he makes it available at conventions. And on his fan club's website he sometimes asks his fans to pray.

It's common for the Risembool Rangers to have a meeting at whatever conventions Vic goes to, as organized through their site and Facebook page (<https://www.facebook.com/RisemboolRangers/>). Here he will often give special attention to his Rangers, including hugs, kisses, personal advice, and motivation. It's easy to see why young girls would be attracted to Vic. He voices many characters that are in anime that appeal to girls, he's handsome, has a bright smile, and is supportive of his fan's dreams.

But some people, including former members of the group, consider it to be a cult of personality (<https://www.tumblr.com/search/risembool%20ranger>). For example, in a recruitment video described as the "official promo for the Risembool Rangers" (<https://www.youtube.com/watch?v=AgpZh165X9E>), images of the members and Vic appear alongside text saying, "We have a great and loving leader... We are friends... We are family... Are you ready? Join us..." This video can be viewed as silly fun, or as

something rather strange. Their website even has a page (<https://www.risemboolrangers.com/about-the-fan-club.html>) on it that attempts to convince visitors that they are not a cult.

Another strange factor is the way that he focuses on young girls to be his biggest supporters. According to *Anime News Network* (<https://www.animenewsnetwork.com/interest/2019-01-30/far-from-perfect-fans-recount-unwanted-affection-from-voice-actor-vic-mignogna/142212>), 43% of Risembool Rangers were underage in 2006. This issue is exacerbated by his age, as any 56-year-old who spends so much time interacting with young girls on a website, without parental supervision, and who then embraces and kisses these children at conventions, is going to raise eyebrows, even if it's innocuous.

From what I can tell, there aren't any other clubs like Vic's in the anime community. Every anime fan has a series they enjoy, and some of them become curious about the voices behind the show, follow them on social media, and get to engage with them. Maybe one day they get to meet them at a convention for a signing or panel. But a forum dedicated to talking about one specific actor, their roles, their personality, and their merchandise, with volunteers pouring countless hours into maintaining and moderating it, and that lasts for decades, is unheard of.

There may be a darker side to this fan club, which is how Vic might be taking advantage of his fan's desire to please him and receive validation from him. For example, by putting them to work without pay. *Anime News Network* describes a volunteer thusly: "One former store manager described her schedule as working her normal job from 3 a.m. to 7 a.m. and attending college courses for 11 hours while managing the fan club store for a few hours in between classes. She then would ship all the store's orders each Friday."

Likewise, how at Animazement 2008, in Raleigh, NC, Vic asked members of his club to work for him in an unofficial and unpaid capacity to sell his CDs and manage his lines. And how afterward he said 'thank you' in a reportedly seductive voice to one of those club members, and then kissed her on the neck.

Allegations

Allegations of misconduct or rude behavior have shadowed Mignogna for years. For example, a site was created in 2011 for the explicit purpose of giving a platform for people to complain about him, called *Vic Meggnogna Horror Stories* (<http://vicmeggnognahorrorstories.tumblr.com/>). It ran for 6 years. Allegations here and elsewhere include treating staff poorly at conventions, being banned from conventions for preaching his Christian faith at panels, kissing underage girls without their approval or request, saying things to minors that are laced with sexual undertones, being homophobic (<https://www.youtube.com/watch?v=8RdHhHkh6Rw&feature=youtu.be&t=4m>) and refusing to sign gay fan art of characters he played, making people feel upset for not being Christian, and being anti-Semitic.

The more research I performed on Vic, the more stories I read from people who claim to have worked at conventions (<https://twitter.com/MarzGurl/status/1087417246798893061>) where he was a nightmare of a guest. Sometimes he'd get banned by the staff, but there were just as many conventions willing to book him and companies willing to hire him. The essential point that each anecdote conveyed was that when the camera is on him, he's one person, and when it's not, he's another.

These rumors continued for years, but it was a *Twitter* thread on January 16, 2019, which coincides with the premiere of *Dragon Ball Super: Broly* in America that lead to our current situation. *Twitter* user 'hanleia' wrote (<https://twitter.com/hanleia/status/1085478817764827136>), "Vic Mignogna is a

homophobic rude asshole who has been creepy to underage female fans for over ten years and I've been screaming about this since 2010 but every year nothing changes." It has received over 8,400 Likes, 4,200 Re-Tweets, and 440 replies by the time of this article's publication, and the responses led to more fans sharing their stories on their own accounts.

The numerous people discussing Vic on the eve of the film's premiere and the days after led to people creating the hashtag #KickVic (<https://twitter.com/search?q=%23KickVic&src=tyah>). The goal being to kick Vic out of conventions, out of the anime community, and ultimately out of a job. Like before, they claimed he was homophobic, anti-Semitic, rude to convention staff, and touched people inappropriately.

In response, On January 19, Vic had a two-hour chat session
(https://www.facebook.com/pg/RisemboolRangers/photos/?tab=album&album_id=2025842334129717&_xts=%5B%5D=68.ARCKp6eb-fwDFc5fobw3JqlzMYyXiBVwxwgmOX3Vmu9mDPX_4VWcqsHIGiXJgKNolFq1gmnVwWzhguHxijFvQOgZ1_9UeRwQxoZLt3l6icWvb93jA1JyUG_wDaHb-tLKuzQH-h_1wUWbJmGWHmTaLKOJ_DtL7CbItWkJHJWGkwQx-X-KeM2buRfgnMdb6VQpB2A_-eP3tGhrBGPv66dlskoCF5csYBBffgVoMJltEa2AKoE-oVghvH4XUXWChbldg19UYhnm7lqo_uwMiAWZRpTaRB46rHr1e8wf7ykMGLgEZUq1Hx3tdLfITvgVSVliJ9QMN44q6ubzMYf-3lWP1lC9HSVQqOcUmryNS7XlJS-ls4kCLLhHJeJTw&_tn=-UC-R) with his fan club members on his Discord channel.

In this chat he said, "These rumors and gossip have been slung around for many many years. None of these outrageous stories are true, and there is not one shred of proof or evidence to support them. ... I have been very open and warm and welcoming to fans for many years, and that includes hugging them, taking pictures and occasionally giving them a kiss on the cheek or forehead. But all of the outrageous stories that keep getting passed around are simply desperate attempts for attention." He adds, "I am NOT homophobic, NOT anti-semitic, NOT a predator of any sort."

He says, "I'll hug 1000 people and 999 will say 'he's so kind and open and friendly with his fans' and 1 will say 'he hugged me too tight and it was creepy.' ... So it appears that I am going to need to revise the way I interact with fans at conventions."

When a fan asked why people are attacking him, he replied, "Because they are sad and lonely. They don't like to see others having fun or enjoying themselves, and feel some sick need to trash anyone who doesn't see things their way."

Vic went on to say that he was going to push back against these allegations after years of "rolling over." "I never wanted to pursue this before because I knew these were preposterous lies with no substance, and I didn't want to be perceived as a jerk who goes

after people. But now they are trying to destroy my career and livelihood. That's not funny."

He then advised his club members to defend him on social media. "Please do whatever you can to counter these lies and negativity. Remember the old saying... 'The only thing necessary for evil to triumph is for good people to do nothing.'"

Following their leader's request, in opposition to #KickVic his fan club members created #IStandWithVic (<https://twitter.com/search?q=%23IStandWithVic%20&src=typd>).

But their posts weren't enough to turn the tide, and the discontent with Vic grew louder.

On January 20, Vic posted a rebuttal (<https://twitter.com/vicmignogna/status/1087239820680880128>) on his *Twitter* account where he says "This is heartbreaking," and then defends against the main allegations.

He says he is not homophobic because, "Some of my dearest friends are members of the LGBTQ community," and he hired several into a live-action fan-made production of *Star Trek* that Vic produced and starred in. "This is a blatantly false statement."

Regarding anti-Semitism, he says this came from a panel he did years ago where a lot of noise was being made in the room next door and he "jokingly" referred to it as "a holocaust." He says it was a metaphor, and he was not referring to the literal Holocaust. "Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone."

Regarding being rude to convention staff, he apologizes, but says that one time he arrived at a con and the contractual arrangements that had been made before the convention were not honored, and "that made me frustrated. That does not excuse making anyone feel badly and I am deeply sorry."

He also apologizes to anyone he has made feel uncomfortable through his unwanted embraces. "It was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels the same way. Hence, I will not be interacting in the same way with fans in the future."

Each of these statements can be analyzed, and that's exactly what MarzGurl on *Twitter* did when she posted (<https://twitter.com/MarzGurl/status/1087417226490048515>) a 32-part critical analysis of his rebuttal.

After this, *Polygon* reported (<https://www.polygon.com/2019/1/25/18197827/dragon-ball-super-broly-vic-mignogna-harassment-response>) on this growing issue on January 25. This brought it to the mainstream media's attention.

Jessie Pridemore Speaks Out

Following the surge of people coming out to share their story, on January 28, a cosplayer and photographer named Jessie Pridemore posted (<https://www.facebook.com/jessie.pridemore/posts/10156852278447159>) her own painful experience with Mignogna on her *Facebook* page. In this post she recounts her experience

of being taken advantage of while drunk at a convention by two unnamed voice actors. She goes so far as to call it rape. Within that story she also accuses Vic of sexually assaulting her by pulling on the back of her hair and insinuating that the only reason she liked a certain anime was because the voice actor who had sex with her was in it. She was so frightened she didn't know what to do, and then ran away in tears.

Jessie said she never spoke out before because of retaliation. "I know this will probably tarnish me getting invited to cons. It's why I started moving away from working for anime companies. I've become really good at ignoring shitty people over the years. But it is long past time that this comes out to light."

The noteworthy thing about her story is that she did not name the people she said raped her, but she did name Vic for making a sexual assault that by any definition is a lesser (albeit equally valid) assault. So by placing the two allegations in the same narrative it leads your mind to associate Vic with the rape, when that's not the case. Not naming the alleged rapist left a lot of unanswered questions, along with the fact there was no supportive evidence for any of the claims.

Despite that, almost all of the commenters supported her and were female, including famous voice actors. They said, "I love you and always support you. Your talent and reputation transcend this." And, "Thank you so much for being so open and honest about this... You are an incredible person and your strength is inspiring." The rest of the comments echoed sentiments of how bad a person Vic is, and how he was, "A creeper and known issue in conventions. ... On a list of 'guests who are to never be invited again.'"

It must be noted that when Jessie was asked for comment for this article-in-progress, she blocked me from her *Facebook* account.

Following Jessie's statement, *Anime News Network* (<https://www.animenewsnetwork.com/interest/2019-01-30/far-from-perfect-fans-recount-unwanted-affection-from-voice-actor-vic-mignogna/142212>), followed suit with their own report about these allegations against Vic. It consists of numerous anecdotes and pictures from fans who personally conveyed their experiences with Vic to the writer of the article. They described how they met Vic at a convention, did a photo-op, and were then made to feel uncomfortable or violated by Vic's closeness, unrequested kisses, hugs around the waist, and even a hand underneath their clothes. This led to its own surge of hundreds of comments where fans shared their stories about Vic, many of which corroborated the article, but others which questioned whether this was gossip and even counted as news.

Allegations, Analysis, and Evidence

We need to take a moment to grasp the magnitude of how many allegations there are against Vic Mignogna, and that this situation has continued for such a long period of time. It is self-evident that the powers-that-be and that continue to hire and book Vic are for the most part content with ignoring the allegations, or are unwilling to take specific actions considering that they may be baseless.

However, given the sheer amount of allegations it feels like some are bound to have veracity. The problem is that there's no way to confirm which ones are true or false because there's such little evidence. The only thing that is public record is pictures of Vic hugging and kissing his fans, and being dropped from conventions over the years for various complaints, but the exact reasons for why remain unspoken, or as mere rumors that he is difficult to work with.

In regard to oft-hand allegations, anybody on the Internet can create a social media account or blog and then fabricate a story about a celebrity, and yet it will still be added to the list with the others and absorbed into the social consciousness. From there the

court of public opinion will condemn the actor and their life will be affected. Such false allegations create a detrimental effect on the named celebrity and they weaken the validity of those that are genuine.

Without evidence, how can someone who was sexually assaulted, drugged, or raped, prove it years after the fact? If they didn't take pictures, record audio, or file criminal charges, it's near impossible. Conversely, how can someone accused of such behavior prove they didn't do it? It's more difficult to prove a negative than a positive. As a result, he-said, she-said is the order of the day.



Nonetheless, circumstantial evidence, in enough quantity, can be effective in showing a pattern. It's a technique that prosecutors often use to show the repeat behavior of a suspected criminal. And this large amount of circumstantial evidence is what's at the heart of this story. You either believe it or you don't. So unless someone with enormous clout in the anime industry, who has a good reputation, and has worked with Vic, comes out with direct evidence to prove that Vic did these things, then we'll never know for certain if it's true or false.

Convention Response

Even without definitive proof, following these recent allegations in January, several conventions announced that Vic Mignogna would no longer attend their convention. For example, on January 28, 2019, PlanetComicon, in Kansas City, announced (<https://twitter.com/PlanetComicon/status/1090116322506223617>), that Vic had cancelled his scheduled appearance.

The majority of responses to this announcement were ones of relief and gratitude that Vic would not be there. For example, 'atomic_pixies' said (https://twitter.com/atomic_pixies/status/1090440834393096193), "I've been warned to stay away from him since I was in my teens. I'm 32." They also said (https://twitter.com/atomic_pixies/status/1090120425907150849), "Thank you for listening to your attendees. It's always such a good sign for a con and makes me even happier to attend."

But a few fans expressed dismay at how Vic is being treated, and were disappointed that they would not get to meet him. 'HaleyAngelo_art' said (https://twitter.com/haleyangelo_art/status/109037210565500802), "I'm also sad to see his cancellation. I had a GREAT experience when I met him, as did my niece (on a different occasion) and several friends who have met him at different conventions. He's so down to earth!"

In these responses the fans who support the cancellation presumed that PlanetComicon was appeasing their requests, when actually the staff stated Vic cancelled the appearance at his own volition. The fans said this was just the staff's polite way of saying that Vic has been booted from the con.

Likewise, the Rangerstop and Pop Atlanta convention announced (<https://twitter.com/karanashley/status/1086306910092038148>) on January 18 that Vic would attend their convention, but then fans sent them the allegations and requested to

#KickVic. The staff replied they had not heard of these allegations before and would investigate them. Then on Jan. 28, the staff cancelled (<https://twitter.com/RangerstopConv1/status/1089959255694888961>). Vic's appearance.

This was followed on Jan 30 by Emerald City Comic Con announcing (<https://twitter.com/emeraldcitycon/status/1090678552817741824>), "Vic Mignogna's appearance at Emerald City Comic Con has been cancelled."

So it seems like a lot of conventions are cancelling Vic's appearances, and thus hurting Vic financially. But then again, if you look at Vic's official convention appearance calendar (<https://risemboolrangerscalendar.weebly.com/>), he still has convention appearances lined up for almost every weekend of 2019.

Timing and Society

Some fans question the timing of these allegations in light of *Dragon Ball Super: Broly's* success. For example, on the GameFAQs forum

(<https://gamefaqs.gamespot.com/boards/2000113-dragon-ball-general/77429356?page=2>), user 'fancystopperman' said, "This #MeToo shit is starting to get to me.

Counting these women, this is the 84th girl I've heard this year claim sexual harassment and NOT ONE of them claimed it instantly. They all waited 4 years—decades. I'm not saying they're all fake but at least one of them has to be off base." User 'MrReadman' replied, "I feel the same way. Just by chance some of them are telling the truth, but the timing of this [convention] cancellation (*you know, the big new Broly movie*) leads me to believe that some (not all) are trying to cause controversy." User 'PFM18' called the allegations "FAKE NEWS."

Others question whether hugging and kissing a person is even a problem, and claim, as Vic does, that it's just innocent touching. That may well be true, but most people don't like to be touched by strangers. According to this 2015 study on touching

(<https://www.independent.co.uk/life-style/health-and-families/body-map-shows-where-men-and-women-are-comfortable-being-touched-a6710336.html>), it is a subjective experience. "We may perceive a touch in a particular place from a relative or friend as a comforting gesture, while the same touch from a partner might be more pleasurable, and from a stranger it would be entirely unwelcome." The conclusion being that the only people who can decide if a touch is harmless are those who are touched. And if you're touched without asking for it, and without consent, it can be harmful.

Conventions are a place where fans are star-struck, the celebrities are paid to be friendly, the fans are young, naïve, and inexperienced, and Vic is a charming man who likes to give his fans special attention. So it's easy to understand why so many of Vic's young fans would be surprised by his unexpected touch, or even shocked and mentally harmed.

It's especially questionable giving the amount of sexual assault that occurs in the convention scene (<https://thegeekanthropologist.com/2015/06/19/the-character-of-sexual-harassment-at-cons/>).

Sexual Assault at Conventions

One of the reasons sexual assault allegations about Vic Mignogna are such a sensitive issue is because sexual assault is a rampant problem at conventions. It is allowed to occur at conventions because the people who put on the conventions don't do enough to resolve it, and the attendees repeat their illicit behavior. This is despite the fact that sexual assault at anime conventions and Western comic-cons is a long-standing and well-known problem (<https://www.bitchmedia.org/post/how-big-a-problem-is-harassment-at-comic-conventions-very-big-survey-sdcc-emerald-city-cosplay-consent>).

In one survey (<https://www.scribd.com/doc/242846454/Sexual-Harassment-Survey-Responses>) of San Diego Comic-Con attendees from 2012, out of 3,600 people surveyed, 59% said they felt sexual harassment was a problem in the comics industry and 25% said they had been sexually harassed. Given that over 130,000 people attend the SDCC each year (<https://www.cnn.com/2018/10/08/new-york-comic-con-is-bigger-than-ever-brings-more-than-100m-to-nyc.html>), this amounts to tens of thousands of victims. Then consider that this is just a single convention, and hundreds of conventions occur each year across the country. It's likely that this issue is just as prevalent at anime conventions, but I could not find a similar study to confirm it.

Assault issues at conventions include preying on underage girls, taking upskirt pictures, gender harassment (https://medium.com/@hudsonschris35_50553/kinds-of-sexual-harassment-during-anime-conventions-69fc131f2aaf), seductive behavior, sexual bribery, sexual coercion, sexual imposition, drugging, fondling, "creeping" (<https://www.washingtonpost.com/news/morning-mix/wp/2014/07/28/creeping-at-a-con-sexual-harassment-at-comic-con-not-so-comic/>), "pressuring someone to consume alcohol, rape, and the general manner in which older men prey upon younger women. Of course, it needs to be stated that men are also victims of sexual assault.

It is especially prevalent in the cosplay community, whereby fans dress up in the costumes of their favorite characters. In part, because in the cosplay world, sex sells. For example, the world's most famous cosplayer, Jessica Nigri (https://en.wikipedia.org/wiki/Jessica_Nigri), with over 3.5 million followers on Instagram (<https://www.instagram.com/jessicanigri/>), makes a point of showing off her breasts in her photographs and videos while wearing skimpy costumes. Other aspiring cosplayers emulate this model for success, and in-turn garner fans who are attracted to them for their sexuality. It's not a stretch to say that the perception of female cosplayers as sex objects has become normalized.

In 2014 the issue was so pronounced that a movement was started by *16-bitSirens* called "Cosplay Does Not Equal Consent

(<https://web.archive.org/web/20140219092052/http://www.16bitsirens.com/consent/>)".

The goal was to combat sexual harassment, from "threats of violence to inappropriate touching, and from lewd *Facebook* messages to stalking." They stated, "The consensus is that it isn't safe to be a woman in cosplay." In addition to shaming people who act like creeps, the recommendation for everyone was that, "It is always better to ask a cosplayer for permission." And of course this highlights the message that it is not okay to hug or kiss someone without their permission. Especially underage girls.

In 2016 this helped lead to the creation of a site to combat the issue called the Survivor Support Network (<http://cosplayer-ssn.org/policies.php>), which is, "an inclusive page for members of the cosplay community who are survivors of harassment, trauma, sexual assault, or abuse to find support and comfort." They have a Convention Harassment Policies (<http://cosplayer-ssn.org/policies.php>) page where you can see every convention in America and whether or not they have a policy against harassment and whether they enforce it. Some have a policy but do not enforce it, while many don't have any policy at all. As a result, sometimes harassed attendees don't know how to respond or who to talk

to, or they're so shocked that they freeze up, look around in confusion, and by the time they regain their composure the harasser is gone—so it never gets reported. Only later do they share on social media about what happened.

And in a world where 51% of incidents of rape are committed by repeat offenders (<https://jezebel.com/analysis-of-untested-rape-kits-reveals-serial-rapists-a-1780808012>), not banning one-time offenders from a convention can lead to repeat incidents. The same thing occurs on campus universities (<https://www.nytimes.com/2017/01/24/us/when-campus-rapists-are-repeat-offenders.html>). Predators, narcissists, sociopaths, and psychopaths repeat their strategies to target their prey and deflect from those who attempt to expose them. It is important to recognize their patterns, both for those who have been victimized to come to terms with what occurred, and to help others avoid being victimized in the future. This is as true for celebrities as it is for average fans. Perhaps even more so for celebrities, as they are in a position of power.

Hollywood is ahead of the anime community in its reaction to the #MeToo movement. For example, in the 2018 Cannes Film Festival, pamphlets (<https://www.hollywoodreporter.com/heat-vision/comic-con-metoo-cosplay-community-looks-own-1129134>) were included in each attendee's gift-bag that included a hotline number to report sexual harassment.

Due to the lag in the anime community for authorities to resolve the problems, fans have resorted to policing themselves and raising awareness of harassment. One of the ways they've done this is by boycotting conventions if they invite a certain guest, or entire conventions outright. For example, Boycott Anime Matsuri (<https://www.facebook.com/BoycottMatsuri/>) is a movement to stop people from attending the Houston-based anime convention, in most part due to the Co-Founder John Leigh's alleged harassment of attendees

(<https://www.chron.com/life/article/Houston-s-Anime-Matsuri-festival-draws-12789687.php>). Their movement has had an impact, as many celebrities cancelled their appearances (<https://nerdiertides.com/2018/03/01/boycott-anime-matsuri-aims-to-highlight-the-sexual-harassment-of-the-anime-conventions-leadership/>). Eventually John Leigh pledged to do better and said, "I sincerely apologize." But for many it wasn't enough and the controversy continues.

Self-policing and movements can be effective, but it's difficult for convention owners to deal with the offenders when they are celebrities because the celebrities are what bring in the money through ticket sales. Conventions used to be about the hobby, but they are now a money-making business first and foremost. Just as in any industry, those with power and influence may use their influence to gain advantage over young, naïve, or fearful individuals for sexual favors. This includes voice actors in anime and video games.

As a result, fans have created a website to report offending celebrities, and a term to brand them by.

Broken Staircase

BrokenStaircase (<http://brokenstaircase.info/>) "is a crowd-sourced directory of alleged predators at US anime conventions." Vic Mignogna is the third entry on the list, in bright red, reading: "sexual misconduct with minors, physical boundary violations, verbal and physical sexual harassment, homophobia, anti-Semitism."

The term Broken Staircase or Missing Stair (<http://pervocracy.blogspot.com/2012/06/missing-stair.html>) refers to a member of a community who is known to cause harm to others and who has to be worked around like a missing stair in a staircase; and then the workaround becomes so normalized that even though people are getting hurt by this person, instead of 'fixing the staircase' they blame victims for not applying the workaround.

The creator of the site says, "Everyone around them knows that there's an issue, but because the problem's been there for such a long time, people have learned to jump over it. The convention community is full of these people due to a common geek social fallacy: that ostracizers are evil and that excluding people is malicious and wrong."

BrokenStaircase was created by an anonymous anime fan as a platform for other fans to report their sexual abusers at conventions without fear of retribution. In an interview with *Kotaku* (<https://kotaku.com/as-spreadsheet-of-accused-abusers-spreads-anime-conven-1831879237>) the creator said, "I just got so tired of seeing so many parallel accounts of the same predators ... I kept seeing people make call-out posts, but if they're being made on *Twitter*, they're just going to vanish into the ether because of time. If they're made on *Facebook*, they're not going to make it outside of a really small circle. The convention community is nationwide."

On the FAQ section of the site the creator says, "A lifetime of abuse watched by bystanders plus an assault last year by a rapist in the convention scene have given me strong opinions on the consequences of silence." They said on *Kotaku*, "I know we all want to be accepting because the reason we're together as a community is because we're rejected for our interests in other spheres of society. ... But at the same time, there are people who are just not safe."

On this site, anybody can make an anonymous claim against a celebrity in the anime community, and then their name will be added to the list after being reviewed by the moderator. This system protects the victim from being targeted, but it could be prone to abuse. So the way it works is that, "People accused by multiple sources will be highlighted in red. Reports made with no associated documentation will be in grey. Take everything with a grain of salt." The creator says, "I'm not interested in punishing these

people. ... Conventions can punish. Law enforcement can punish. ... I am here to equip people who are likely to be victimized to arm themselves and be suspicious because fear keeps us safe in these situations."

In reading through the list (https://docs.google.com/spreadsheets/d/1hL-rK_3LtjqL7atYAfwi1k-WSvNQeiRhGoWT7uTLA/edit?usp=sharing) of alleged offenders I was surprised to see another Dragon Ball voice actor's name: Todd Haberkorn, the voice of Jaco the Galactic Patrolman in *Dragon Ball Super*. Todd's entry reads: "providing alcohol to someone under 21, inappropriate comments about body, invited attendees to sleep in hotel room." The linked statement (<https://colossal-guest-2011.tumblr.com/>) says this incident occurred at Colossalcon 2011, in Sandusky, Ohio.

BrokenStaircase's existence is a symptom of a much larger problem. While this site may serve a beneficial purpose, it can also be considered a blacklist of actors not to interact with, and in-turn, a list of people for companies not to hire. This can damage that person's career, and with voice actors in particular, who are self-employed individuals, it can amount to decades of work going down the drain. The fact that anybody can post anything they want about someone, and then it's open to subjective opinion, should be frightening to every celebrity out there. And maybe that's the point: To hold these people accountable when the system fails to do so.

Voice Actors Are Not Perfect

It may be difficult to view voice actors as fallible creatures who make mistakes or have a history of purposeful abusive behavior. I suspect it's because we hear their voices so often that we become familiar with them in an emotional and idealized way. Oftentimes this emotion is comforting, uplifting, inspirational, funny, or nostalgic, and we associate their voice with this feeling.

It's especially difficult if they do things for the community, inspire their fans, or help others on a personal level. We say, 'They couldn't have done this bad thing here because look at all the good they've done over there.' Likewise, if you've had a positive experience with a celebrity at a convention, you might make the false assumption that somebody else could never have a negative experience with them.

For a counterpoint to this argument, a lot of people thought Bill Cosby was a kind old man who made millions of people laugh every week on *The Cosby Show*, and we giggled at his silly commercials for Jell-O Pudding, but then it turned out he raped dozens of women (https://en.wikipedia.org/wiki/Bill_Cosby_sexual_assault_cases) through drug-facilitated sexual assault. Cosby was convicted (<https://www.nytimes.com/2018/04/25/arts/television/bill-cosby-sexual-assault-allegations-timeline.html>) in 2018 of three counts of aggravated indecent assault after 60 women came forward to accuse him, years after their assault occurred.

It's also common for fans to admit that yes, perhaps the celebrity has some quirks, but it is the victim's fault for not realizing this and treating the actor with the proper care. They say, 'You shouldn't have dressed like that.' 'You shouldn't have drank so much.' Or, 'You shouldn't have gone up to their room.' This shifts the blame to the victim. Hence, the need for the Broken Staircase label.

The Comics Alliance

(<https://web.archive.org/web/20160129185129/http://comicsalliance.com/sexual-harassment-women-in-comics/>) posed the question, "Which one of these statements makes more sense to say: 'These people need to find more ways to stop people from harming them.' OR: 'These people should stop causing harm.' If you ever find yourself saying the former instead of the latter, take a moment and ask yourself why." The

Missing Stair entry (https://en.wikipedia.org/wiki/Missing_stair) on *Wikipedia* states, "the problem is the missing stair (the predator) and the solution is fixing the stair (stopping the predatory behavior)."

So with all of these allegations about Vic Mignogna floating around, what has one of his biggest employers done about it?

FUNimation's Response

FUNimation has hired Vic to perform as Broly for the last 16 years. Allegations against Vic have been well-known in the industry for 16 years. FUNimation has known about these allegations, yet continued to hire him. Fans are upset by this, and that's why the *Twitter* post on the night of *Dragon Ball Super: Broly's* premiere went viral.

FUNimation has been contacted for comments on sensitive issues before, including executives, producers, and social media managers, but they have never responded. This time it seemed better to ask former FUNimation employees to comment, thinking that they'd be able to open up. But no, they did not respond. Similarly, when *Polygon* published their article on Mignogna, they wrote, "When *Polygon* reached out to FUNimation ... the company declined to comment on the allegations."

FUNimation has never stated their private business decisions for why they continue to hire Vic in the face of so many allegations, so for the time being one can only surmise.

From a legal standpoint the allegations against Vic have not resulted in criminal charges or provided direct evidence of guilt. So firing Vic because of these allegations, no matter how numerous, may have produced legal repercussions against FUNimation. Even if FUNimation provided a detailed explanation for their rationale behind the decision, it would still leave questions that may never receive answers.

From a business perspective, fans expect Vic to reprise his role as Broly because they associate him with the character. Replacing him may result in backlash by fans against FUNimation, against the new voice actor, and result in reduced ticket sales, which would upset those who are invested in the company.

Furthermore, it would tarnish the company's image, bring trouble to the cast and crew of each series he's been involved with, and blight everyone in the industry who has worked with Vic, yet said nothing and did nothing.

There's also the moral question of ruining a man's career because of allegations that cannot be proven.

FUNimation has, however, taken action with similar incidents in the past. For example, in 2015, voice actor Scott Freeman was convicted to 3 years of prison for possession of child pornography (<https://www.animenewsnetwork.com/news/2015-09-06/voice-actor-scott-freeman-convicted-of-possession-of-child-pornography/92346>). FUNimation stated, "In May of 2015, FUNimation became aware of the legal matter involving Scott Freeman, at which time we suspended our relationship with Scott. In the wake of recent news, we have permanently ended the relationship." So in a situation where there is direct evidence of criminal conduct and actual conviction, FUNimation severs their ties with an actor.

But in regard to Vic Mignogna, on the surface it seems they've done nothing. However, it's likely that FUNimation and their parent company Sony Pictures are conducting an internal investigation into these allegations about Vic. The results and subsequent response remain to be seen.

Is it possible that Vic Mignogna will be replaced as the voice actor for Broly, or soft-banned from voice acting entirely by the industry? If so, what would that mean for Vic, for the fans, and for the series he's been involved with moving forward? What would it mean for the industry at large? Will people take notice? Will it spark change?

Dragon Ball Voice Actors Weigh-In

What do those who have worked with Vic think about these allegations? Five Dragon Ball voice actors and professionals in the anime industry that have worked with Vic were asked to weigh-in.

One of them was Adam Sheehan, a former Senior Marketing Manager at FUNimation. He did not respond to an initial email before publication, but his name will be important later in this story. Of the rest, only two voice actors responded, and one of them requested they remain anonymous. It can be presumed the others don't want their name associated with this scandal.

One who did not mind speaking candidly is Kara Edwards, the voice of Videl in *Dragon Ball Super*. She said: "I do believe Jessie, as in my experience very few victims make their stories up. I will say I have never been assaulted by any voice actor or person in the business. Have I seen or experienced inappropriate actions? Of course. Until recently, that was part of being a woman in any industry. And I'm glad to see things changing."

Another voice actor in the industry, Jamie McGonnigal (https://en.wikipedia.org/wiki/Jamie_McGonnigal), said (<https://twitter.com/McBenefit/status/1090066200577695744>), "I've been a voice actor for 20 years. I've known Vic Mignogna for most of that. I'd heard stories of him preying on particularly younger women & girls & I've seen his behavior up close. Now dozens of courageous women are sharing their experiences. We must listen to them. #KickVic. We need to be better. As a community, an industry, a world. We need to listen to survivors. What does it say to our daughters & sons when we say to "Prove it." and "We don't believe you"? It says no one will believe you. And it says go ahead and do what you want. We need to stop."

Todd Haberkorn Speaks Out

Jessie Pridemore did not name her alleged rapist at the convention circa 2009. However, in the comment section of her post she did say, "6 out of 7 women who messaged me about the unnamed voice actor have been correct." More people tried to guess, but she explained that she did not want to come out and name him because, "I can't be alone when I do this. He's too powerful in the community." As time went on, people on *Twitter* started to accuse Todd Haberkorn of being the unnamed rapist.

At 1:30 EST, January 31, voice actor Todd Haberkorn made a statement (<https://www.facebook.com/todd.haberkorn.75/posts/10217214343366123>) on his *Facebook* account where he claims that he is the one who had sex with Jessie Pridemore in 2009, but that he did not rape her.

In Todd's post he recalls the particular details of the events that Jessie referred to. He says that he was a guest at a convention with a friend named Adam, and that a "very close friend" of Adam's would be at the convention's weekend party for the guests. So he meets up with this friend (Jessie), and the three of them have drinks at the open bar. They flirt with one another, continue drinking, and then proceed to their hotel room, "where we engaged in consensual, adult intimacy: sex." He says that the following morning, the two of them woke up early at around 5 to 6 am, and "left the hotel room together – she went her way and I went mine."

So Todd states they had consensual sex between two adults. Alcohol was involved, and he acknowledges this as a factor, but argue the two both wanted to have sex and they left on amicable terms.

He says, "A week later, this young woman contacted me and we began chatting; getting to know each other a bit more. She mentioned that she was glad Adam had introduced us." Todd provides images with his post as visual evidence of the two of them chatting in casual conversation. Todd says Jessie suggested that they become sex buddies at conventions throughout the country, having sex whenever they happened to meet up.

But Todd says that he declined the offer because he was going through a divorce, and through their conversations, "I saw that she had some issues that I didn't feel equipped to take on given my own circumstances." Later, he says Jessie made the offer again. "After that, we lost touch but roamed in similar circuits on the con scene. If we happened to cross paths, things were pleasant and polite."

He adds, "As a sexual abuse victim myself, I'm incredibly sensitive to anyone's experiences with abuse in this realm. ... But I also know that I am 50% of the equation and have just as much right to share my side of the story as well."

Todd finishes the post with his own hashtag: "[#Truth4Todd](https://twitter.com/search?q=%23truth4todd&src=tyah) (<https://twitter.com/search?q=%23truth4todd&src=tyah>)."

This post generated hundreds of comments and shares. Most sided with Todd and thanked him for coming forward to counter the allegedly fake allegations. "I am so glad that you had the courage to come out and share this. Lying about rape is wrong, just as much as raping is wrong. Thank you for pointing out the truth." "Seems a lot of females who feel slighted like to become drama queens and purposefully try and make their hook-ups into something they're not in order to gain attention and make the man look bad." And, "People are more willing to destroy a man's career or life before they would consider that a woman might not be stating the truth."

Others were confused by it. Especially with how it contradicted Jessie's earlier allegations. They wondered if it counts as rape if both people are drunk. And if so, who raped whom? But above all else, why Todd would want to name himself prior to Jessie naming him. Did he feel that it would be best to get ahead of the story in order to frame it with his own narrative? Or was it because he felt maligned by these allegations and needed to defend himself?

In any case, the differentiator between the two stories is that Todd provided evidence of their conversations after the incident. This lends more credence to the rebuttal than to the allegation. Because you have to ask yourself, why would a woman who claimed that she was raped, then proceed to sexually proposition her rapist, flirt with him, and remain friends while hoping to be sexual partners with no strings attached?

From what can be observed from their contradicting claims, it seems like it was a night where two lonely and hurt people got drunk and made each other feel better for an evening. This happens all the time. Where the problems begin is when that experience gets defined as rape. And on the one side, Todd's fans think he did the right thing by exposing the supposedly false narrative of a woman who claimed rape. On the other side, Jessie's supporters continue to believe her claims that she was taken advantage of, and feel it was scummy for Todd to contradict her and publish private conversations.

A divisive contrast of #MeToo versus #FakeNews.

Adam Sheehan Speaks Out

Later that same day, at 5:48 pm, EST, former Senior Marketing Manager at FUNimation Adam Sheehan posted (<https://twitter.com/neumaverick/status/1091106085006524416>) a 16-part rebuttal to Todd Haberkorn's original rebuttal on his *Twitter* account.

Even though Adam's last name was not mentioned in Todd's statement, he comes forth as the one being mentioned. Adam says, "He decided to include me in this response so I wanted to help add to the narrative." In this rebuttal he questions why Todd would come out at all. Also, "I've known Todd for many years and like most people he's a mix of good and bad. I've been friends with other VAs that we all thought were good guys and shocked to find out they were very much not that after all."

Just as Todd did with Jessie, Adam shares images of private conversations between himself and Todd about Vic Mignogna. Their discussions indicate that sexual assault allegations surrounding Vic Mignogna were an open secret within the voice acting industry.

He then describes his own recollection of the party. He says, "Jessie was repeatedly given more to drink, again and again. Someone should have stopped people from giving her drinks. Someone should have stopped her leaving with Todd later that night to go back to his room.... That someone should have been me and a few others. ... It doesn't matter the excuse, I didn't help. I was a bad friend that night."

He states that both Jessie and Todd are good friends, as Todd taught his daughter theater and Jessie was the photographer at his wedding. So it's not about loyalty. "This is about Todd jumping on Jessie's very brave post about Vic when he wasn't named in it to save his own skin."

Adam questions Todd's intentions. He wonders, if Todd's so sensitive to people's experiences with abuse, then why put out this statement while Jessie is going through such turmoil for speaking up about Vic? Why not take this moment to speak up about Vic, or about his own abuse? "I know Todd is not a Vic fan so this could have been a moment to step up and publicly address things he's seen. But he did not. Instead he went after Jessie. Easy target."

He then adds his own hashtags to the mix: "[#BelieveSurvivors](https://twitter.com/search?q=%23BelieveSurvivors&src=typd) (<https://twitter.com/search?q=%23BelieveSurvivors&src=typd>), [#HaberWTF](https://twitter.com/search?q=%23HaberWTF&src=typd) (<https://twitter.com/search?q=%23HaberWTF&src=typd>)."

Commenters appreciated the added context and balance, but were just as divided. A woman said, "This adds way more transparency and fortifies my stance to believe Jessie. You may not think you were a good friend that night but you are certainly being one

now." A man said, "God I hate this #MeToo movement bullshit. I'll always support Todd! Looking forward to seeing him at cons this year."

Conclusion

Ultimately, all of these issues became public because the problems with these celebrities and within the anime industry were not addressed years ago, quietly, and in private. Multiple people who are in a position of authority at major companies, voice acting studios, and at conventions have heard these allegations about Vic Mignogna for years, and yet chose to do nothing about them. So then when Vic is cast once more as Broly in *Dragon Ball Super: Broly*, and it becomes one of the most successful anime films of all time, a limelight is cast on Vic and his years of sexual assault allegations. This causes fans to speak up about Vic, which leads to Jessie Pridemore accusing someone of raping her and tying Vic into the story. This draws attention to her story, and also to this unnamed alleged rapist. People start guessing that it's Todd Haberkorn and this makes Todd come out with a rebuttal, where in the process he names Adam. So then Adam comes out with his own rebuttal, and the entire can of worms explodes in our faces!

This is where we're at, so let's take a moment to think about this complicated situation.

The allegations against Vic Mignogna have not been proven. But logic dictates that if hundreds of people across a span of 16 years come forward to share their stories of how they were sexually assaulted or offended by the same man, and none of these people know one another, then there is likely some truth to their claims. A normal employee in any industry would not be receiving assault allegations over a span of decades if there weren't something fishy going on. Likewise, if colleagues of this man are aware of these allegations and talk about it amongst themselves as if it's an accepted fact, then maybe that really is the case. But without evidence, what should be done?

In some cases it may be necessary to throw a Broken Staircase out of a group because the harm they cause is too severe and they have already been given enough opportunities to change. In other cases, they may be able to make amends and alter their behavior. At the very least, we need to recognize them. Tolerating the perpetrators to such a degree that it enables them to continue doing heinous acts needs to end. Look to the Catholic Church sexual abuse cases (https://en.wikipedia.org/wiki/Catholic_Church_sexual_abuse_cases), involving priests and thousands of underage boys to see how ignoring the problem, or arguing that it's too embarrassing to address, can enable it and make it worse.

What's the worst that can happen with keeping a Broken Staircase in place?

Sexual assault.

With Vic in particular there has been no definitive evidence to convict him. This divides people, and they say, 'He's finally getting what he deserves!' Or 'Our society is condemning an innocent man!'

But how are we supposed to know the truth if the people on the inside won't allow the truth to come out? Don't people deserve to know who they're dealing with? Who they're giving their money to? And to be protected from harm? We're left to wonder, 'How many Broken Staircases are out there?'

There's more that can be said, but what's here is enough food for thought. What was discussed is a symptom of bigger problems. Vic is just one more example in a long line of lessons. But at what point will the entire Staircase collapse? And will the repairman ever fix it?

As Vic once stated: "The only thing necessary for evil to triumph is for good people to do nothing."

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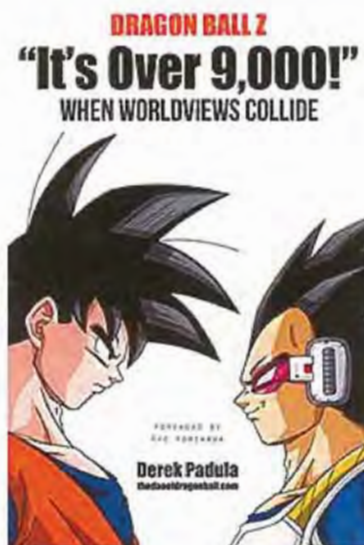


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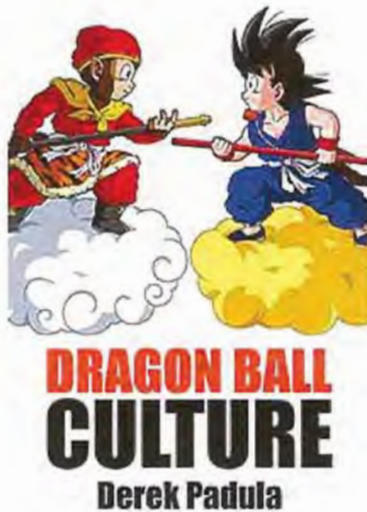
[Derek Padula \(https://thedaooofdragonball.com/about\)](https://thedaooofdragonball.com/about) is the author of The Dao of Dragon Ball and "It's Over 9,000!" (<http://thedaooofdragonball.com/books>) Connect with Derek on [Twitter \(https://www.twitter.com/DerekPadula\)](https://www.twitter.com/DerekPadula), [YouTube](https://www.youtube.com/channel/UCEo-a4tHSWeY5nkzSIJcpg)

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(<https://www.facebook.com/pages/The-Dao-of-Dragon-Ball/291746590854799>). Goku inspires him to rise higher!



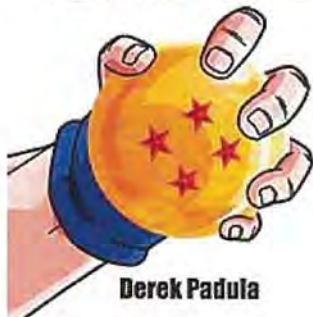
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Exhibit 50.040

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Jacob Buckelew • 5 months ago

Incredible write up. I absolutely believe women's safety is important and abusers should be heavily punished. But that is exactly why we need to slow down and think over things carefully. There's a lot of people who think that it is more appropriate to do the opposite and it's incredibly toxic. It does more harm than good for whoever or whatever agenda they speak for. Anyone that claims to be a rape survivor better not be dealing with half truths or falsehoods and such people should be dealt with accordingly or we risk great injustices both socially, psychological, and professionally on either side of accusations in the present and in the future.

6 ^ v • Reply • Share ›



mena • 5 months ago

So, all of this has been known for years, and no one from the industry came together to confront Vic about his overly touchy behavior with fans and force him to stop? No one lectured to him how a grown man shouldn't get so close to fans and how it may be perceived? Do these industry people not realize that if Vic falls, they all fall with him? This type of behavior jeopardizes everyone's paycheck. You have fans that would refuse to watch a show unless certain voice actors are reprising the role. I feel as if all the people that were working with Vic just ignored the behavior because they felt it didn't involve them directly. It's all about to come crashing down now. They're all gonna wish they nipped it in the bud years ago. Too late now.

You anime industry people better learn to stick together and check each others behaviors instead of all of this Twitter bickering and hatred amongst each other. Vic, Todd, who's next? Watching them all throw each other under the bus is interesting. This Broly movie has gotten the attention of the "big wigs" and they would probably love to see it all crash and burn. I also find it interesting that Schemmel would waste his time on Twitter liking kickvic tweets and blocking Vale instead of using his clout as the voice of Goku to gather the entire DB crew together and hold an intervention with Vic. It's not his responsibility you say, but when conventions start banning the entire DB cast, they will finally get it. You already have people tweeting bandragonball. Guilt by association is real. I wonder what Sony will do. Will they stop the hemorrhaging or exacerbate it to teach everyone a lesson? There is a ton of money at stake and I don't see this ending well.

12 ^ v • Reply • Share ›

12 ^ v • Reply • Share ›



john titor → mena • 4 months ago

Maybe they did and he just didn't stop.

2 ^ v • Reply • Share ›



GokuSS400 • 4 months ago

Look, my HONEST reaction here is that first and foremost....this should NOT continue as "Trial by Social Media" or "Twitter investigates" or any of that stuff.

Look, if you think you were raped or you think someone went too far with you....REPORT IT TO THE AUTHORITIES. TELL THE POLICE.

These allegations and such SHOULD ABSOLUTELY be handled IN A COURT OF LAW. Where the only thing that matters is the FACTS.

Let the Police/FBI whatever investigative authority....DO THEIR JOBS AND INVESTIGATE THIS STUFF, determine whether a crime was committed, and then forward that to the office of the Prosecutor to determine whether charges are warranted or not.

7 ^ v • Reply • Share ›



Teal-Rose Jaques → GokuSS400 • 3 months ago

except how those things are handled by authorities isn't all that great... A lot of the time it isn't taken seriously or is simply dismissed, especially if you don't have physical evidence. So if he isn't actually out there raping people, what evidence do they have? Just what is caught on camera here or there, where he is typically on his best behavior.

If you look to some of the photos with attached stories in the article they linked above (the anime news network one), you can see some HAVE tried to submit it, at least online or to con staff. I don't doubt some DID report it but, again, unless caught in the act or with some form of physical evidence, the people get dismissed. Even this article said, by the very nature of it, it ends up being he said/she said. This ignoring how often people are dismissed or poorly handled even WITH proof (Just one example: <https://www.king5.com/artic....>

On top of that, if you work in that industry, in any real capacity, making such an accusation can get you yourself blacklisted even if it was true. We have seen it with others: even Goshu's accusers felt the backlash

Others, even Cosby's accusers tell the backlash...

It isn't a great system, even if it is improving. More ARE being directly reported as people see they are being taken more seriously. But too many years of 'well, what did you expect wearing that/drinking that much/being in this area?' and similar have led people to feel powerless. ESPECIALLY if they are accusing someone in a position of power while not being in one themselves.

2 ^ v • Reply • Share ›



noneedtoknow → GokuSS400 • 3 months ago

Can't happen when it's the internet. You are trusting people to actually talk in front of a court when they have a hard time writing a sentence in the comments section of a video. That and victims are usually the losers in these cases. Whether it's a male or a female.

^ v • Reply • Share ›



Teal-Rose Jaques → noneedtoknow • 3 months ago

Wow, you're quite the ass aren't you? Shown by their own recounting above and in the linked articles, they are just fine at "writing a sentence". The victims seem to range all kinds of people, and while I don't know your definition of "losers", I am sure not all of them fit it. From colleagues to cosplayers to fans to con staff. There have been accusations spanning the lot of them.

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I only know of Vic and Todd through Star Trek Continues. It's unfortunate to see both of these guys involved in this type of controversy. While I do condemn anyone who actually behaves as the allegations claim, we do have a standard of innocence until proven otherwise in this country. We just can't abandon that, no matter how vile the allegations may be. On that basis alone, I raise my hand in support of these guys until it's been proven otherwise.



Agreed. Allegations nor emotional falsehood stories should never be used as actual evidence for political gain.

I agree.



I'm gonna need a bit more than hugs and kisses to consider it assault tho. No offense to anyone who thinks that's assault but, just no. Maybe it's because where I'm from, culturally speaking, we greet people that way, so it's not a big deal for us. Not only that, but this isn't just some random guy hugging strangers, this is a dude hugging and kissing his fans on the cheek. I don't really see a problem with it.

Exhibit 50 044

Let's be honest now. If fucking a girl while drunk (both parties), is now considered rape, half of American men that go to bars would be in jail. Fuck, I wouldn't be surprised if that's how some of your parents met. Consensual sex between 2 drunk parties is a thing, sorry.

6 ^ v • Reply • Share ›



Brendan Ledwith → Yuki Tachibana • 4 months ago

. If fucking a girl while drunk (both parties), is now considered rape, half of American men that go to bars would be in jail.

It's been rape for years and years in many places. The logic is simple: when under the effects of alcohol, you're in an altered mental state that decreases much of your ability to function and make sound judgements. As such, you are no longer considered to have the ability to consent.

2 ^ v • Reply • Share ›



Yuki Tachibana → Brendan Ledwith • 4 months ago

Yeah...but both parties are drunk, so why is it that 1 party specifically is the one that has to go to jail?? Doesn't seem very equal to me.

2 ^ v • Reply • Share ›

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TonyTony Chopper → Yuki Tachibana • 2 months ago

the thing is with stuff like MeToo, there are a lot of girls know who are attention whores and will make shit up if they see something online about some famous guy that they briefly hugged. quite often, these girls will talk about it bein their dream to go and meet this person and mabey a hug and kiss if its allowed by the famous person they are meeting. and they will make up dates and places as long as it sounds reasonable. dont take this the wrong way, I de know that lots of stuff in that kind of chain is true, but this is what I have learned from people around me (that I am not particularly close with). the type of girl that does what I talked about above are, sadly, very common amongst girls that are around the age of lots of the girls in his fan club.

^ v • Reply • Share ›

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Poosmith • 4 months ago

One thing that I am VERY confused about is Jessie allegations.. she said she was raped and wouldn't name who it was.. but she somehow TRIES to tie Vic into the whole mess.. when in reality it was Todd.. and then Adam tries to help Jessie by saying this and that about both Todd and Jessie... but the question I have is.. HOW DOES THAT RELATE TO VIC?! Sure showing proof of texts about "knowing" some of the allegations circulating is one thing.. but there is a BIG problem with that being "proof". It all bubbles down to more 'he said she said' stuff.. they are just allegations in the end.. and to me the REAL problem of these allegations is that Jessie tried to relate her rape allegations to Vic, when it was actually Todd.. she tried to push a narrative that Vic was the villain and people are just accepting this? And I know they also said stuff in the text about how Vic can be such a Diva to con staffers.. but how the hell does that relate to anything that is going on with his sexual harassment case? Nani da fuck?!

3 ^ v • Reply • Share ›



Bruno ➔ Poosmith • 4 months ago

Exactly Jessie allegations makes no sense. Unless of course maybe Jessie and others are protecting Todd whom might not be an white actor?

2 ^ v • Reply • Share ›



David Blau • 5 months ago

Not taking sides here, but hundreds or thousands of people have been claiming for decades that aliens landed at Roswell in 1947. Very specific allegations. Doesn't make it true. Point is, evaluating claims with little hard evidence is difficult and prone to dangerous assumptions.

There's no doubt that sexual assault is a problem, and that it's under-reported. We just need more people to come forward with corroborating evidence.

6 ^ v • Reply • Share ›



Corfish1001 ➔ David Blau • 5 months ago

You're not going to find evidence of sexual assault. The best you're going to find is some uncomfortable photos of him with his fans. He wouldn't do anything majorly aggressive somewhere where people can easily get evidence on him.

What we do know is hundreds of girls and con volunteers have all spoken for over a decade about his behavior. I have witnessed some aspects of this behavior first hand

(He walks around cons with groupies following him, and no security to keep them from crowding around him. That is a huge safety issue.) I have never been to a con where someone hasn't brought up what a prick he is.

We've also now got other voice actors speaking out against him. Some have said while they have never witnessed anything, they have heard the rumors too and believe them. Others have said they have seen him get a little weird with his fans before, and it isn't an industry secret.

Ultimately, all we have here are witness statements, with no physical evidence beyond a few awkward photos. But the difference between this and say the moon landing, is that there is no evidence he DIDN'T do any of this, whereas we have evidence that the moon landing DID happen.

[see more](#)

9 ^ v • Reply • Share ›



Jéssica Ailin Gramkow → Corfish1001 • 4 months ago

Never met Vic personally, never knew his work apart from RWBY (I watch subbed anime and the ones I watch dubbed is in my own language, since I'm from Brazil) and never knew all the shitstorm that was happening with Vic until I started to read some reddit posts about it. Needless to say, I was shocked, but not at all surprised, since sexual harrassment is a nasty shit occuring in the industry for years now.

But I do believe that the hate bandwagon is true and most people are jumping in just for their 10 minutes of fame. This mob mentality is true and it's disgusting. I'm not saying that ALL allegations are fake, some may be true, who knows? But who am I to judge when I don't have anything besides the good ol' she said/he said?

Vic can act like a prick in conventions, that much seems to be the consensus. More than once I saw people complaining that he was late for his pannels, left early, things like that. And that sucks. I wouldn't doubt that some of those allegations came from unhappy fans that were treated poorly during pannels (BUT NOT SEXUAL HARRASSED OR HARRASSED AT ALL).

What pisses me off too is that a lot of VA's that worked with him for years apparently "Saw it happen" or "Happened to them" and they never did

ANYTHING. But now that there's an angry mob with the #KickVic they suddenly have the urge to step up and say something. It seems iffy, if you ask me.

Either way I'll wait for the authorities or someone come up with REAL EVIDENCE of this, because so far all that was presented to me was hearsay and bandwagons full of haters.

2 ^ v • Reply • Share ›

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Secundum • 5 months ago

Either provide proof or it didn't happen.

'Innocent until proven guilty.'

Even if every single allegation is true (which is a statistical impossibility), we should still treat the accused as normal, because to do otherwise is a VERY slippery slope.

7 ^ v • Reply • Share ›



Iggy → **Secundum** • 4 months ago

Corporations don't need to conform to legal basis in that regard. They can fire anyone for anything without having to need to explain any of it. Though, the moment it becomes an issue of any sort of discrimination, that's when one lawyers up.

If a company determines association with an individual is a risk, there is no such thing as "innocent until proven guilty."

3 ^ v • Reply • Share ›



Fiere → **Iggy** • 4 months ago

Yet they kept him for all of these years, despite voice actors claiming its true and he has done it to them.

^ v • Reply • Share ›

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Xiro → **Secundum** • 4 months ago

So now we start recording our encounters with him and he will now completely

change the way he interacts with people. Aren't you smart.

As the author put it, hundreds of reports over a span of years, how likely is it that every single one is a misunderstanding or outright false? Not very. Innocent until proven guilty is a phrase for the courtroom.

3 ^ v • Reply • Share ›



Daniel Chung → Xiro • 4 months ago • edited

and it's to prevent mob mentality...DO YOU UNDERSTAND HOW DIFFICULT IT IS TO PROVE YOU AREN'T A SEXUAL PREDATOR? you know how difficult it is to shake off such labels EVEN IF it's found that you aren't a sexual predator? that label IS FOR LIFE.... not only that.... but we actually have evidence of people falsifying information, hell the people in the photos, that we've seen, demonstrated and stated that the allegations or the use of their photos for such context is completely false.

If you want to go with "innocent until proven guilty" stays in the courtroom, then there's no justice.... there's only vindictive and mob mentality..... and you know how dangerous that is? people HAVE BEEN LYNCHED.

9 ^ v • Reply • Share ›

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Charles Mitchell • 3 months ago

I believe in waiting for any and all evidence to be presented. Some of the "evidence" presented by ANN has been debunked by the people in the photos who never said they were touched inappropriately and that their photos were used without their permission - now maybe it was a mistake on behalf of ANN or just an intentional attempt to falsify evidence I cannot say. This is why trial by social media is stupid and wrong.

I never knew Vic's name until all this happened, I have watched several anime he worked on - but I do not follow voice actors so I have no idea who any of them are. I am not a fanboy for Vic. So I am not blindly backing him nor am I backing the accusers. I get that they might have been afraid that they would not be believed, or their jobs would be at risk. But if you are working with someone that has assaulted you is that really a place you should remain or want to be? Not victim blaming here, just stating if a co-worker assaults you sexually or violently

you should tell somebody. Go speak to a higher boss or the HR dept. if serious enough (like rape or attempted rape) tell the police.

As to the studios like FUNimation and RoosterTeeth firing someone or conventions banning them on unproven rumors and accusations alone - should they then not also take action against the other VA's who have said that they KNEW for years about Vic and said nothing?

[see more](#)

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IGeo • 5 months ago

/Todd is the good guy here. Hoping he overcomes this and ultimately wins this war, He certainly has the resources to triumph and silence his accuser.

6 ^ v • Reply • Share ›



Dave → IGeo • 5 months ago

I don't know if any of the allegations against, nor commendations for this person are factual or not. I do know that this issue is systemic throughout our culture. Regardless of the area, function, business or occupation. Sexual abuse is and always has been a major problem throughout the history of humanity. We can be eternally thankful that todays methods of information distribution can now make these allegations known much faster than ever before and we can now render whatever assistance is needed, be it legal, medical or just a sympathetic ear. This and the fact that those who have been abused are now speaking up, not hiding or repressing their abuse and allegations.

6 ^ v • Reply • Share ›

Exhibit 5 050



Esmondtheleo → Dave • 5 months ago

We also know that there are plenty of false charges and if you look hard enough you find alot of them get over turned later but no one reports that normally cause it doesn't seem as much of a story to talk about male victims of false allegations. And men are usually made the abuser or if they are abused they are made to look weak. Until real evidence is made public, any accusations or actions taken against him by companies over the allegations is a hasty judgment and for me personally they will lose my respect as a whole for covering for themselves now and not either acting before or sticking it out till the truth is revealed.

2 ^ v • Reply • Share ›



DerekPadula Mori • 4 months ago

Since this article was published on Feb 1, more conventions have cancelled Vic's appearances, including the Dragon Ball-centric KamehaCon in Dallas, Texas.

Monica Rial, the voice of Bulma, has said that Vic Mignogna assaulted her:

"Stop harassing my friends and colleagues. You want the truth? IT HAPPENED TO ME! I had hoped it wouldn't come to this but here we are. I don't owe you anything but if it'll stop it from happening to someone else, then so be it. I will tell you everything when I'm ready to do so."



3 ^ v • Reply • Share ›



AntiMetaman → DerekPadula • 4 months ago

Well, I didn't even know who Vic was 3 days ago but since this was all over my twitter and youtube feed, I had no choice but to do the research. This article was very well written and non-biased compared to the ANN article. I do agree that even without evidence, if allegations from hundreds of people dating back from 2003, are all on the same person, then that shows a pattern of behavior. The issue of hugging and kissing people on forehead/cheek is clear and there's no doubt about it. Vic even has admitted to it. What's not clear are the allegations of sexual assault / rape. Now with

Monica Rial coming out, there's more to the story than just Jessie Pridemore. I'd have to say that as an animation company who cares about their reputation, they would probably fire him and that goes the same for conventions. Not having no support from fellow VAs and this many allegations is something to not ignore. I do think that everyone deserves a fair trial and proper investigation.

6 ^ v • Reply • Share ›



Xiro → AntiMetaman • 4 months ago

Considering Ms. Rial is another big name for Funimation, it would be very unwise to keep him on at this point.

2 ^ v • Reply • Share ›

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Poosmith → DerekPadula • 4 months ago

So apparently, Monica Rial has just taken Vic's position from Rooster Teeth right after he got fired.. hmmm idk but smells a bit fishy :thinking:

2 ^ v • Reply • Share ›



Brendan Ledwith → Poosmith • 4 months ago

What role? Do you mean voicing Uncle Qrow? Because besides rumors that I can find no evidence for, I'm very confused about your statement. And if that is what you mean, I'd be inclined to doubt such a rumor regardless, unless Monica has demonstrated substantial ability to voice male characters?

1 ^ v • Reply • Share ›

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Iggy • 5 months ago • edited

I can't speak for anyone here but myself, and anything I say can ultimately be dismissed because I choose to retain my anonymity and all persons involved.

So whether you take what I say as fact or fiction is entirely your call. But from my PERSONAL experience, Vic was one of the most rude and toxic individuals I've ever met. He never violated my space, never acted abusively towards me, and never harassed me, but he

was hostile to a point where he literally cost me a job.

I've long moved on since and I am happy with what I do, but because of this I'd be lying if I said I didn't bear some level of a grudge against him. And that makes any opinion of the man, and his accusers, completely biased.

I am not jumping on the bandwagon because everyone else is, but I ultimately and fully side with every single one of his accusers. Not because it's the right or decent or factual thing to do. I do it because I am personally vindictive towards him. It's petty as all hell, I know that. But it's at least a reason that is personal to me, and not because of something I read online.

I want this guy to rot in unemployment hell because he put ME through an emotional roller coaster. Justice for his victims is just a bonus to me. I know that makes me a pretty terrible person, but in every single past case like this, I always advocated for honesty, transparency, and rational thought before immediately picking side. If I'm going to point out to any hypocrisy, it'll at least be my own.

4 ^ v • Reply • Share ›



DerekPadula Mod → Iggy • 5 months ago

Since this article was published, Vic has had several more conventions cancel his appearances. And earlier today Vic was fired from his role on the show RWBY.

3 ^ v • Reply • Share ›



Iggy → DerekPadula • 5 months ago

Wonder how Funimation will respond. He's not an actual Funi employee, but he's one of their most frequent freelancers.

Considering some of the shit their employees have put up with regarding him, I imagine this is exactly what they were looking for to sever business with him. They could even go so far and recast Broly for the home video release.

2 ^ v • Reply • Share ›

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ListlessAzure • 3 months ago

while overall each element, mostly takes a neutral stance, when looking at the whole, it

focuses solely on his negative, giving only of a poor light placed upon him, with no rebuttal or mention of actions by the accusers or their own controversies that have come out.

"The allegations against Vic Mignogna have not been proven. But logic dictates that if hundreds of people across a span of 16 years come forward to share their stories of how they were sexually assaulted or offended by the same man, and none of these people know one another, then there is likely some truth to their claims."

-Logic also dictates that when someone is proven to have lied they will continue to do so, therefore if one person has lied about an action or claim then their word should be weighted far less because of it, this is why known liars and fabricators are not used in courts by prosecutors due to their character being in question. With the validity of the current accusers in question, their stories lacking consistency and being found with severe issues in validity.

A major point I feel was missed was the Funimation Internal investigations that occurred. that two were done, the logical thought would be that he had done an action that between the first and the second caused him to be fired. however no allegation has been brought forwards that was within that scope of time. Now this causes a conflict with the narrative because one

see more

1 ^ v • Reply • Share ›



DerekPadula Mod → ListlessAzure • 3 months ago

Thanks for the detailed rebuttal and counterpoints. I will take these into account when I write a revised version for my book, USA DBZ, and for any future articles on the topic of Vic Mignogna. I appreciate you taking the time to provide statistics and sources.

2 ^ v • Reply • Share ›



A.O.Cortez • 3 months ago • edited

this is dangerous trend nowadays.. remember smollet's hoax ? it is so easy to claim something yet in the face of real police investigation the truth came out the opposite.

you need to be careful in writing about this issue as it is as of now a mob justice on social media. People with axe to grind will pile on and on for what ? petty revenge ? it is also unfair for you to bring rumors of homophobia and antisemitism as if it have any bearing on sexual assault which is a crime by itself. No need to add rumors to the mix just to make vic worse , the victim should take him to court and let police handle it.

imagine , nowadays , it is safer to be investigated by police and proven to be innocent.. than to face lynch mob in social media where there is no justice except lynching..

1 ^ v • Reply • Share ›



Pecan Crisp • 4 months ago • edited

Really? You go into great detail about all of this evidence that can't be proven true or false, but don't talk at ALL about all of the evidence from KickVic that not only COULD be proven false, but WAS. The edited footage, multiple people coming out and saying their footage/photos were being used for this without their consent (and that they actually stood with Vic), the fake swatting by someone at Funimation; You can say all you like that neither side can be proven, but we've certainly proven that KickVic is not above false claims. Edit: just realized how long ago this was written, a lot of this hadn't happened yet. Sorry about that. But you can't deny that a lot of the stuff that's come out shed's quite a bit of shade on the KickVic sides truthfulness.

1 ^ v • Reply • Share ›



DerekPadula Mod → Pecan Crisp • 4 months ago

You're correct that I wrote this article before those events occurred. I may write a follow-up piece or perform an interview with Vic, as one of his close friends wants him to do an interview with me. We'll see what happens. In the meantime I've been busy working on my next book: Dragon Ball Language.

1 ^ v • Reply • Share ›

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Exhibit 5 P. 055



Spartacus • 4 months ago

@DerekPadula - Do you happen to have a list of the VAs who have come out and said that they too were victims? So far I know of Kara Edwards and Jamie Marchi

1 ^ v • Reply • Share ›



DerekPadula Mod → Spartacus • 4 months ago

Yes. Here's a list of the voice actors who have spoken out so far:

MONICA RIAL

<https://www.instagram.com/p...>



"This behavior has been going on for 15+ years. We're not going to allow it anymore."

KARA EDWARDS

[see more](#)

2 ^ v • Reply • Share ›



Michael Harrison • 5 months ago • edited

Okay I haven't read through all this but I know how it feels to be accuse of sexual harassment from the 4th grade from being double dare to touch a girl on her front left shoulder and a girl I like who was her best friend added more to their story, like I went in the girls locker room and tried to pull their shorts or pants down.

I also didn't recall during this as a child, but I also had things I didn't recall so much during my childhood but this I didn't do and told my grade school counselor that I did touch the girl on the shoulder but I didn't remember during the other stuff and as now I know I didn't feel like I

Exhibit 056

wouldn't of done that. My grade school counselor ask me if I was trying to make friends, so at that time I know I couldn't get out of that so I say "yes" to her, and I guess we talk about things and how to reenact with girls, because now I'm very careful how I talk to women and how I show I'm interested in them.

So this makes things hard for me in some areas but I had over come this.

I also think this should be look into more and to try to find proof or people who might of been witnesses to these events, that been told about him. Also photos that might of been taking that's not been photo edited with fans that look like he might been during things like this with women if any photos been taken, because most voice actors/actresses have their photos taking with fans or people.

1 ^ v • Reply • Share ›



vnisanian2001 • 2 months ago • edited

I hope Judd Apatow, who started the attacks on Cosby, dies a slow and painful death.

I also hope the baddest thing ever happens to CNN's Don Lemon, for giving those liars a platform and a voice. Dr. Phil needs to have the same thing happen to him, too.

^ v • Reply • Share ›



vnisanian2001 • 2 months ago

A lot of Bill Cosby's so-called "victims" were actually already proven false, but the media's not doing a retraction.

^ v • Reply • Share ›



rjd1922 → **vnisanian2001** • a month ago

Source?

^ v • Reply • Share ›



vnisanian2001 • 2 months ago

MarzGurl is an evil cunt who needs to be held in a maximum security prison.

^ v • Reply • Share ›



vnisanian2001 • 2 months ago

Anime News Network is a piece of fake news that needs to be banned from the media, and you are clueless for supporting the #MeToo Movement and believing every single woman who says they were raped.

^ v • Reply • Share ›

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TonyTony Chopper • 2 months ago

well, I guess in this case we should like the voice but not the man. I hope he can keep his career, but only because his voice works well for the roles in witch he was cast. if broly appears in the future, I just hope he is allowed to come back a play that role.

^ v • Reply • Share ›

Feb 1, 2019

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Exhibit 058

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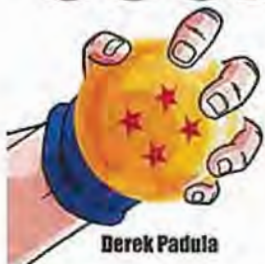
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Coming Fall, 2019!

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Exhibit 060

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DBZ: Light of Hope



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
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73/73

Exhibit 5 P. 073



RoosterTeeth

16 years old
from Austin, Texas

📅 Born April 1, 2003

📅 Joined October 1, 2018

VIC MIGNOGNA

4 MONTHS AGO

Effective today, Vic Mignogna is no longer a part of the cast of RWBY and Rooster Teeth is ending all associations with Mignogna. This will not affect the creative content of RWBY.

UPDATE: We in the RT Admin Team have always supported civil debate on the site. Recently we've seen less than civil conversations and debates around here, and we would like and we ask you to keep the site ToU in mind when you are posting. If you believe a post violates the ToU, you can flag it for moderation attention by clicking the little flag at the bottom right of the post. However, posts not violating the ToU should not be flagged and repeated flagging of posts simply because they do not agree with your views is not acceptable behavior. For more information on what constitutes a flagable post see [this thread](#) and feel free to contact an admin through direct messaging for clarification of any points.

-9 Cool

3313 🗨️

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COMMENTS (3313)



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Everyone, we wanted to give you an update on the Vic Mignogna situation. Following an investigation, Funimation recast Vic Mignogna in Morose Mononokean Season 2. Funimation will not be engaging Mignogna in future productions.

2:29 PM - 11 Feb 2019

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One of Anime's Biggest Voices Accused of Sexual Harassment



Beth Elderkin
2/19/19 3:30pm

Illustration: Jim Cooke, Photo: Getty Images

Last summer, voice actor Vic Mignogna went into a booth with a few others to record audio for a video game. At one point, Mignogna asked the client, who was overseeing the session, if she was okay with his performance. When she didn't answer right away, he followed up with: "You know the old Latin—or is it Greek? There's an axiom that says: Silence gives consent."

Stories about Mignogna have been circulating online for over a decade, including through the Tumblr blog Dear Vic Meggnogna, but the latest round of accusations started surfacing around mid-January of this year. io9 spoke with more than 25 voice actors, cosplayers, industry professionals, convention employees, and former fans about their experiences with Mignogna. Many of them asked not to be named in fear of retaliation from Mignogna or his fanbase. These, along with the testimonials circulating online, paint a picture of a 56-year-old man who aggressively hugs, grabs, touches, kisses, and propositions women—often without asking for their consent. It happens at panels, in autograph lines, at private events, and behind closed doors. His behavior has become so known in the anime and comic convention communities that it's more than an open secret.

“Have you heard of the missing stair analogy?” voice actor Jamie McGonnigal said. “It’s basically what happens when many folks in an industry know about a certain person, and warn everyone about that person, kind of quietly... It’s related to a missing stair in that, yeah, the stair is missing, but you tell the people that you know to skip that stair because it’s broken. The problem is, people who don’t know about that stair are bound to trip [on it]. That’s what it’s been like for upwards of 15 years. People just know about Vic.”



An image from Funimation's *Dragon Ball Super: Broly*, which featured Vic Mignogna as Broly.
Image: Sony

Vic Mignogna's name might not ring a bell for most, but within the anime community, he's a household name. He's appeared in hundreds of anime shows, films, and video games since 1999, including playing the lead in 2004's *Fullmetal Alchemist*. Recently, he was heard as Broly in Funimation's *Dragon Ball Super: Broly*, which made more than \$30 million at the U.S. box office, an impressive feat for an anime film. It's the latest movie in the *Dragon Ball* series, one of the biggest anime franchises in the world. The series even had a balloon at the Macy's Thanksgiving Day Parade last year.

Over the course of his career, Mignogna has amassed a strong, largely youthful fanbase—including within his official fan club, the Risembool Rangers. He's also a regular on the anime and comic convention circuit, attending on average about 30 cons per year—though that doesn't look to be happening this year. Accusations of improper conduct with his fans, first reported by Anime News Network, led many comic and anime conventions to rescind their invitations to Mignogna. Entertainment group Rooster Teeth shared that Mignogna will no longer voice a character on its American anime, *RWBY*. Funimation, a top media company for importing and dubbing Japanese anime, announced it's "no longer engaging" with the voice actor, following an internal investigation. io9 has viewed three of the reports that were submitted to the company.

Voice actor Charlotte (not her real name) confirmed to io9 that she shared her story with Funimation for its investigation. She relayed to io9 her experience, one which Mignogna denied in emailed responses to io9's questions. Charlotte said that at a con in the late 2000s, she was getting ready to go to dinner with Mignogna and some other con guests and employees. Mignogna asked if they could stop by his room first, because he wanted to show her a video, and she

agreed. Because both were in relationships—Mignogna with his now ex-fiancée Michele Specht and Charlotte with her then-boyfriend—she believed the invitation was platonic.

As they watched the video, she says, Mignogna grabbed her by the arms and kissed her aggressively, including putting his tongue inside her mouth. She tried to pull away, only to have him pull her back in. She told io9 she felt scared and frozen, “like a board.” Then, things escalated. Charlotte said Mignogna backed her up to the bed and she fell down, then he got on top of her. Soon after, a friend came to check on them, and she immediately got off of the bed.

“I was saved by a door knock. I can’t say what would’ve happened [otherwise]. I don’t know if I would’ve kicked his ass, or he would’ve kept [going] and I stayed frozen,” she said. “I keep waking up in the middle of the night with that panic feeling. It’s that panic, it’s that feeling I have to do something to get him away from me.”



“I remember he said, ‘Open the door, nobody has to know.’”

Since the recent allegations have surfaced, Mignogna has released two statements on Twitter. First on January 21, saying he regrets if he made his colleagues or fans feel uncomfortable. The second statement, released on February 13, added that he’s taking time to “recommit to God and [seek] the

help of a counselor.” When reached by io9 for comment Mignogna said that he has never forced himself on anyone, claiming that “any and all encounters I’ve ever had have been 100-percent consensual.” He gave specific responses to the accusations present in this article—denying some and providing his own version of events on others.

Several people in the anime industry, speaking under the condition of anonymity, shared with io9 their experiences with the voice actor. Rachel (not her real name) recounted with io9 two experiences she says she had with Mignogna. She said the first one, which Mignogna has denied, happened at a convention in 2008. She said a relatively friendly weekend turned uncomfortable when, outside their adjacent hotel room doors, Mignogna grabbed her in a tight embrace and wouldn’t let go, even as she tried to pull away. Like Charlotte, she knew he was in a relationship. She then went into her room, which shared a door with his. That’s when the knocking started.

“I heard a slow knocking on the door that was between our two rooms. I knew it was him so I ignored it. And just after two minutes, the hotel room phone rings. And I answered it, and it was Vic. I remember he said, ‘Open the door, nobody has to know,’” she said.

She said he continued to knock on the door, and the phone rang at least one more time, until she stepped into the bathroom and turned on the shower—sitting on the bathroom floor for up to an hour, shaking.

The second situation happened at a separate convention a couple of years later. Rachel said she had agreed to stop by his room briefly. She said he invited her to sit down on the couch in the front room of the suite, and after a brief

conversation she claims he knelt in front of her and began rubbing the backs of her thighs, and said: "Let me be sweet to you."

Rachel told io9 she then got up to leave—only for Mignogna to stand up, embrace her tightly, and press his face against hers. She tried to get out of his embrace but says he wouldn't loosen his hold. She kept giving him reasons why he should stop, like reminding him he had a girlfriend, but he kept repeating the same line—"Let me be sweet to you"—over and over, at least five or six times, she said. Rachel says she eventually got out of his embrace and left the hotel room, and later told the con's guest services manager about the incident (the manager confirmed to io9 that they had been told).

Mignogna acknowledged this event happened, including that he rubbed the backs of Rachel's thighs, but said the encounter was consensual. He also said that, to his recollection, they had shared a bottle of wine, were "probably" in her room, and had kissed before she pulled away and asked that they stop, which he says he immediately agreed to and left her room. Rachel responded by denying they ever kissed and that she doesn't recall drinking wine with him. Both she and the guest services manager separately stated she had been in Mignogna's room.

Rachel says she did not report the incident to hotel management or to the police because she feared Mignogna would attempt to negatively impact her career. "He's very well known in the industry—very, very powerful in our industry," she said.

According to the guest services manager and Rachel, in apparent retaliation after his sexual advances were rebuffed, Mignogna requested that Rachel be moved to another room for their previously scheduled joint autograph signing session (Mignogna denied doing this). Rachel said she spent the two-hour session alone, as most fans were there to see him.



Vic Mignogna as Captain Kirk in the *Star Trek* fan series, *Star Trek Continues*.
Image: *Star Trek Continues* (YouTube)

Voice actor Gretchen (not her real name) described to io9 how, before their first panel together at a con in the early 2010s, he grabbed her from behind and starting tickling her aggressively until she screamed at him to stop. Mignogna told io9 he did tickle her without her consent, calling it a “playful and friendly” attempt to lighten her mood.

There’s also a way Mignogna sometimes hugs women, as detailed by one voice actor and confirmed by several others who’ve experienced or witnessed it. According to the voice actor, who asked not to be named, when Mignogna greets women, sometimes he’ll grab a handful of hair so he can pull their heads back slightly, kissing their necks or whispering in their ears. She said it can sometimes happen in public, including in front of fans, and there’s pressure to go along with it so they don’t seem like they’re making a scene. Mignogna has denied this, telling io9, “I don’t greet people that way.”

In 2014 professional cosplayer Diana (not her real name) attended what she believed was a post-convention group dinner for con guests; however, when she arrived she found it was a private dinner with Mignogna. After dinner, Mignogna walked with her to a parking area. She claims he proceeded to grab and kiss her aggressively—without her consent—before inviting her to his hotel room. Diana said she refused, reminding him that she had a partner and knew he was engaged (at the time). She proceeded to walk away to meet with friends at a nearby hotel, one that Mignogna was also staying at. He followed.

“He’s sticking next to me the whole way there. He’s trying to convince me to come into his room and spend the night with him, saying ‘It’s so hard to find someone who understands the industry and lifestyle,’ saying he’d rock my

world,” she told io9. “We ended up outside of his door, and I was continuing to walk not realizing it was his room, when he stopped and was like, ‘This is my room, let’s go.’”

She didn’t go.

Mignogna acknowledged this event happened but said he remembered it “very differently.” He said the two of them went out to a private dinner, after which they “mutually and consensually” kissed, and he invited her to his room. According to Mignogna, Diana responded that she wanted to, but “shouldn’t since we were both involved with someone else at the time,” after which they parted ways. Diana denied Mignogna’s version of events, saying “it wasn’t nearly as simple as he makes it seem—telling him we were both taken was not the end of it.”

Most of Mignogna’s responses to these women’s stories included some mention of how, from his viewpoint, the women seemed fine with their interactions—and even acted friendly toward him later. He mentioned that he and Diana “flirted quite a bit both times” they saw each other and noted how both Gretchen and Rachel were cordial or friendly with him during their interactions after the events took place. All three of them rejected this notion as being proof that they weren’t upset with Mignogna for his behavior.

“I have seen him a handful of times since, always in public or work settings. He is mistaking my ‘friendliness’ for professionalism,” Gretchen said. “Vic can try to justify his actions any way he likes, but it still doesn’t make them any less inappropriate or invasive. The man has no boundaries.”

"After the pic, I joked, 'Well my friend's gonna be angry' and then he said, 'Oh, let's make her really angry.'"

It's easy to find proof of Mignogna's physical closeness with fans, especially female fans. There are countless photos available online—including through the hashtags #KickVic, which has shared accusations against the voice actor, and #IStandWithVic, which later emerged as a show of support. The photos show him hugging people, holding them in his arms, pressing his face against theirs, kissing them on the cheek. Some fans remark on their experiences with Mignogna positively and have been sharing their photos and stories in support of him. Others call their encounters with him uncomfortable and nonconsensual.

Former fan Viola Hewak told io9 that at a con in 2011, when she was 16 years old, she went to get an autograph from Mignogna—a common convention activity that fans sometimes pay for—when he unexpectedly got up and said, "I'm going to hug you!" Hewak told io9 he pulled her into an embrace, his hands sliding up and down her back and sides, and wouldn't let go when she tried to pull away. At a 2013 con autograph signing, another former fan named Michelle Light said he kissed her intensely on the cheek right as their photo was being taken, without asking for permission first, and added that if she hadn't moved her head she thinks he would've reached her mouth.

Con-goer Kelly, who asked her last name be withheld, described to io9 what happened at an anime con in 2014 when she went to get Mignogna's autograph for a friend of hers. She wasn't a fan, though she was familiar with his work.

"I regrettably asked for a pic with him as a way to show my friend, 'Hey, guess who I'm with.' After the pic, I joked, 'Well my friend's gonna be angry' and then he said, 'Oh, let's make her *really* angry,'" Kelly said. "He grabbed me into a tight embrace against his body, both arms. And it wasn't just a light peck on cheek, it was a big kiss. I remember when he did it, I felt frozen for a second, and then felt my face turning really red in embarrassment."

Convention staffers also discussed their own Mignogna interactions with io9. Two people who've worked at Phoenix Comicon (now Phoenix FanFusion) shared how staffers would sometimes alert coworkers over the radio when a certain person was entering an area. One of them described it being used for Mignogna, to make sure a particular 19-year-old female staffer wasn't in the area. She called it "Code Vic."





Vic Mignogna at the 2016 Webby Awards.

Photo: Getty Images

Mignogna's contact with fans isn't limited to autograph lines and panels. Over the past several years, especially following the success of *Fullmetal Alchemist* in 2004, Mignogna has cultivated a devoted fanbase online. Most notably, it's been through the Risembool Rangers, an official Vic Mignogna fan group that was started in 2005 and is currently managed by Mignogna's mother, Barb Myers, who goes by the name "Matriarch" when she addresses the group. Most of the group's activity is on a Discord chat, which is a private text and voice chat primarily for gamers, so io9 can't independently confirm the current membership numbers. But there is an official Facebook page with about 5,500 subscribers, as well as a closed Facebook group for the Risembool Rangers with nearly 1,600 members.

One former Risembool Rangers member, Dave (not his real name), joined the group back in 2009 when he was around 11 years old. Dave described the group as "absolutely rabid," ready to defend the voice actor against any criticism. Still, he stayed because he was a big fan of Mignogna and an aspiring voice actor. He left the group shortly after meeting Mignogna, saying he no longer

considered himself a fan after their encounter. While taking a photo together at a convention in 2012, Dave said Mignogna unexpectedly grabbed him around the waist, pulled him close, and asked if he had a boyfriend. At the time, Dave was 14 years old and presented as a young woman.

“I felt violated and invalidated by my idol,” he said. “I wish that I could take it away from my memory because I can’t hear that guy’s voice without thinking about how I was a grossed-out 14-year-old kid...I love anime, and I legitimately cannot watch dubs with his voice in them.”

According to former members io9 talked to, the Risembool Rangers lean toward the younger side and are sometimes underage. Mignogna communicates with his fans through email and has given out his phone number for fans to get in touch with him. He’s held Q&A sessions with members through the private Discord chat, and attends con parties hosted by the fan club—which have included events like a 2007 Twister competition, judged by Mignogna himself, where he (dressed in a *Star Wars* uniform) can be seen “signing” his name on a few young women’s lower backs as they’re playing.

A January 2019 chat, shared on the group’s Facebook page, showed Mignogna denying the allegations against him, suggesting it could be connected to the recent *Dragon Ball Super: Broly* release, and requesting members share positive stories about him online. Since then, at least eight people io9 talked to said they’ve faced online harassment for either sharing their stories or for stating online that they support the victims.

The harassment has included pizzas being sent to a former workplace, the receiving of death threats, and a fake Twitter account being created in the name of one individual. Mignogna initially spoke out on Twitter on February 8 to condemn harassment of people criticizing him. But an email shared with io9 also showed Mignogna, three days later, privately telling a fan how a certain voice actor had “turned to [be] hateful toward me.” Mignogna mentioned that person by name.



“If I’m a jerk and you don’t tell me so, then you’re consenting to me being a jerk. See how that works?”

In summer 2018, as preparations were being made to record the dubbed vocals for *Dragon Ball Super: Broly*, two people connected to the project met with Funimation executives to suggest Mignogna be recast due to some improper conduct allegations making the rounds in the voice acting community, according to someone present at the meeting. This person, who asked not to be named, said that Funimation later told them the company was conducting an investigation into Mignogna’s conduct—but it was inconclusive, so Mignogna was kept on the project. io9 reached out to Funimation for comment on this report, and the company referred us back to its original statement:

Following an investigation, Funimation recast Vic Mignogna in *Morose Mononokean* Season 2. Funimation will not be engaging Mignogna in future productions.

Mignogna told io9 that, until recently, he's "hugged everyone who comes to my autograph sessions," saying it's a common activity for voice actors. But he said that he's learned he has to change this. And over the past few weeks, Mignogna has seemingly adjusted his public behavior—at least at conventions. He appeared at Bak-Anime 2019 in early February, one of the only conventions he's scheduled to attend this year after a majority rescinded their invitations. Voice actor Neil Kaplan, who was also a guest at the show, said he didn't see Mignogna touching any guests during his autograph signing. He mostly stayed behind his table. There are also videos of Mignogna from his panels at that con, showing him tearfully apologizing for recent events, saying he got "lazy" about interpreting whether fans wanted him to hug them. But several of the people io9 talked to said it's time for him to be out of the voice acting industry.

Voice actors and other professionals have been speaking up online, including McGonnigal, *Dragon Ball* co-star Monica Rial, and voice actor Neil Kaplan—all of whom confirmed to io9 that Mignogna's behavior is a problem. Specht, Mignogna's ex-fiancée, also released a statement to io9. In her statement, she said she was not aware that he was pursuing other women during their relationship, and that she supports the people coming forward with their stories about Mignogna's behavior:

My 12-year relationship [and] engagement to Vic Mignogna ended in May 2018. Very soon after, information about Vic's previously unknown behavior began to surface, and has continued to do so over the last several months—each revelation more shocking and painful than the previous, spanning the entirety of our time together. I have had to face the reality that the loving, monogamous relationship I believed in and was devoted to never existed.

This pattern of egregious behavior is so linked to his position of power that the voices of those stepping forward with allegations need to be heard clearly, and their claims taken with the utmost seriousness. And I extend whatever remains of my broken heart to every one of them.

Last summer, Mignogna went into a studio and told a small group of people that silence gives consent. It may have been in response to a query about his performance, but voice director Donald Shults told io9 that it eventually became something else. When others in the room tried to push back, including Shults saying that the phrase doesn't reflect today's values, Mignogna didn't drop the subject. He clarified.

"If I'm a jerk and you don't tell me so, then you're consenting to me being a jerk. See how that works?" he said. "If somebody is doing something you don't approve of and you don't say anything...the implication is that you must be okay with it."

They're not silent anymore.

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ABOUT THE AUTHOR

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Beth Elderkin

Video Editor and Staff Writer at io9. My doppelganger is that rebelling greeting card from Futurama.

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Vic Kicks Back

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Vic Mignogna spent the past two decades building a career as a voice actor. He worked with great people, made great friends, and represented great companies.

Over the past month, all of that work and goodwill was maliciously and brutally destroyed by a dedicated group hell-bent on dragging his name and reputation into oblivion. This capped off with hurtful allegations from people Vic has worked with, and considered friends, for many years.

Now Vic has been removed from Rooster Teeth and Funimation, and disinvented from several conventions, disconnecting him from his income and from his fans and supporters.

Vic has tried to mitigate the situation with public statements, and the attacks on him and his character persist. Anyone who knows Vic knows he would never ask for this, and does not want this course of action. When your opponents leave you no choice, you eventually have to kick back.

This Fund is set up for Vic's legal defense fees. There are MANY possible defendants in different jurisdictions, from boring bloggers to multi-million, even multi-billion dollar corporations. It takes an

\$182,860 of \$200,000 goal

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Words cannot express the depth of my gratitude for all the kindness and support that has been shown to me over the last few weeks. I had hoped that my apologies and acknowledgments, both public and private, would be received. But I have now very reluctantly retained a law firm as my last and only recourse to attempt to salvage my reputation and my 20-year career in this industry.

A friend expressed a desire to set up a GoFundMe for legal expenses. I approved his kind offer and am so grateful, but I am not managing it, nor will I personally receive any of it. Any surplus will go to the Salvation Army Dallas Domestic Violence and Abuse Shelters.

I hold no malice toward anyone. I just love my work and the fans, and sincerely wish to continue.



vic mignogna • @vicmignogna • Feb 20

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3.3K 5.3K 22K