

EXHIBIT 10

6th Annual John and Lawrence Bonzani Memorial Law Lecture

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1 Klin: Okay. I'm going to begin again, but I'm not going to
2 repeat all of that. I hear I was muted for, uh, the
3 virtual audience. So, you want to mute over there so
4 we don't get feedback? Alright. Fantastic. Got a
5 lot of tech issues going here. Are we good? Everyone
6 can hear me in all the spaces? Okay. I'm still Celia
7 Klin, uh, the Dean of Harpur College. And I am still
8 delighted to welcome everybody here today, um, for the
9 Sixth Annual John and Lawrence Bonzani Memorial Law
10 Lecture. Um, so, a warm welcome to everyone who is
11 here in person, of course and also the many people who
12 are joining us virtually today. I want to thank and
13 acknowledge one more time, but it's worth saying it
14 again, um, our alumnus Andrew Bonzani, his wife Marie,
15 um, and their son, Luke, who are in the audience
16 today, um, and also a welcome to the friends and
17 family of the Bonzanis who have joined us by the
18 webinar. Uh, this annual lecture is made possible
19 each year, uh, through the support -- the generous
20 support of the Bonzanis, and we thank them for their
21 unwavering support of Harpur College, the gift of this
22 lecture series, which has, for many years enriched,
23 the education of our students and faculty. And as
24 you'll see today, um -- I think it will be clear, uh -
25 - that today's lecture will make it clear the value of



1 this gift. So, I wanted to ask Andrew if he would
2 share a few words with us, and then I will move on and
3 introduce the speaker.

4 Bonzani: From up there?

5 Klin: From up here.

6 Bonzani: Yeah. (Inaudible - 00:02:43).

7 Klin: (Inaudible - 00:02:44).

8 Bonzani: Okay. This will be very short. It -- it's just, uh,
9 a matter of thanks. Um, first of all, I want to say
10 hello to my daughter, Claire, who is, uh, watching
11 from, uh, remote. She couldn't make it today. And
12 she'll kill me for this introduction. Uh, I did want
13 to say just, uh, a word of thanks to Erin, the Harpur
14 Edge team, Dean Klin, for making this a reality. Uh,
15 this is the fifth, I think, uh, annual lecture series,
16 um, and, uh, it's an extraordinary amount of support
17 and, uh, investment of the Binghamton, um, team for
18 this. So, thank you for that. Uh, I -- I wanted to
19 comment quickly on how this one in particular came
20 about. Uh, I was sitting in my -- my little office at
21 home, uh, when my son came in and said, "Hey, Dad."
22 Uh, he was watching The -- The Vow, um, and he was
23 reading about the Epstein case. And he said, "You
24 know, the lead prosecutor went to Binghamton." Um,
25 and sure enough, she did. And I -- I reached out to



1 Moira, a cold call -- I mean, a cold email out of
2 nowhere. And I figured, well, how can I get her
3 attention so she doesn't think, who is this person?
4 So, I said I'm a Binghamton grad in the subject line
5 or something along those lines. Binghamton grad '86.
6 So, um -- and responded right away. Um, said, I'd
7 absolutely be interested in going back and giving back
8 because of what you felt for the school and -- and
9 university. So, I'd like to end with, uh, again,
10 thank you all for joining, but a special thanks to
11 Moira for -- for agreeing to do this. So, thank you.
12 Klin: Thank you, Andrew. Um, I want to recognize the co-
13 sponsors and planning committee for tonight's event.
14 That includes the Harpur Edge, who has done a lot of
15 work to put this lecture together, the Binghamton
16 University Human Rights Institute, the Pre-Law
17 Advising Office, and the Thurgood Marshall Pre-Law
18 Society. And before I introduce our speaker, just a
19 couple of housekeeping details. So, we are going to
20 ask people to hold questions and comments until the
21 end, where we'll have plenty of time for questions and
22 answers. Um, and for those people who are attending
23 virtually, feel free, of course, to put your questions
24 into the chat and we'll get to as many as we can. Um,
25 and again, for those of you in person, please join us



1 afterwards that way, um, for a reception. And for
2 those of you who are not attending pers- -- you know,
3 in person, but are virtual, um, I guess go have a
4 snack afterwards and think of us. Um, so, the
5 speaker. It's my, uh, pleasure to introduce our
6 distinguished speaker, Moira Penza. Moira graduated
7 from Harpur College in 2005 with a concentration in
8 both English and History. Um, as a student, she was
9 very busy. Served as a judicial review board member,
10 a member of the speech and debate team, Phi Beta Kap-
11 -- Kappa, and a number of other things. Uh, she went
12 on to earn her JD from Cornell Law School and is
13 currently a partner at Wilkinson -- I meant to ask you
14 to pronounce this, but it's probably Stekloff. Okay.
15 I got it. Um, and is an accomplished litigator. Her
16 legal commentary, impressively, has been features --
17 featured in many prestigious outlets, including The
18 New York Times, NPR, Bloomberg, the BBC, The Guardian,
19 The Daily Beast, and many others. Um, Moira has been
20 a trial counsel and a member of the trial team on some
21 of the firm's most high pro- -- profile cases. Uh,
22 before this position, she previously served as an
23 Assistant United States Attorney for the Eastern
24 District of New York, where she led numerous criminal
25 investigations and prosecutions involving both white



1 collar and violent crime. A lifelong New Yorker, uh,
2 Moira has dedicated much of her career to public
3 service and pro bono work in the New York community,
4 especially on behalf of victims of sexual violence.
5 Uh, she has been widely recognized, um, for her work,
6 including being named a Rising Star by Law360, honored
7 by Bloomberg's Law "The 40 Under 40" list, named one
8 of the most powerful lawyers in New York State for
9 three consecutive years by City & State magazines.
10 So, quite an impressive career. So, please help me to
11 welcome Moira Penza. (Inaudible - 00:06:50).

12 Penza: I can do this. It's fine.

13 Klin: Okay. Do you want me to put this back to where it
14 was?

15 Penza: Sure.

16 Klin: Okay. Oh, you need -- and you're going to need -- so
17 you might want it over there.

18 Penza: Okay. That's fine. We can put it over here.

19 Klin: That's fine. That's why I (inaudible - 00:07:06).

20 Penza: That works.

21 Klin: Alright.

22 Penza: Good evening, everyone. Thank you, Dean Klin, for the
23 generous introduction. And thank you, Andrew and
24 family, for inviting me to be part of this lecture
25 series. Andrew, it's an honor to be part of the



1 legacy that you've established for your brothers.
2 Being back here at Binghamton fills me with joy and
3 gratitude. When I applied to Binghamton, I knew the
4 school had an excellent academic reputation, and I
5 also knew I couldn't afford private school. What I
6 didn't know was that matriculating here would be one
7 of the best decisions of my life. I met my best
8 friends here 20 years ago, and I learned how to learn,
9 how to develop relationships with professors, how to
10 use office hours. I had my first legal job working as
11 an intern at the Broome County Public Defender's
12 Office. At Binghamton, I developed a confidence that
13 enabled me to excel when I went off to Cornell Law
14 School, one of the top law schools in the country,
15 then Paul, Weiss, one of the top law firms in the
16 country, and then where we pick up our story at the
17 United States Attorney's Office for the Eastern
18 District of New York, one of the top prosecutor's
19 offices in the country. Binghamton prepared me to
20 succeed when measured against the best of the best and
21 to do so with courage, kindness, integrity, and a
22 commitment to service, all traits that were instilled
23 during my years here. Now, on to NXIVM, which is why
24 you're all here. So, we're going to start -- it just
25 clicks. No. Okay. Clicker is not working, but we'll



1 figure it out. Let's see. Sorry.

2 Female: No. It's okay. I'm sorry this is happening.

3 (Inaudible - 00:09:12).

4 Penza: Okay. Um, so, we're going to start on October 17th,
5 2017. So, as a lifelong New Yorker, as Dean Klin
6 pointed out, I am fairly religious about reading The
7 New York Times and the New York Post on a daily basis.
8 That morning, on the front page of The Times, was this
9 article describing a secret organization in upstate
10 New York outside of Albany, in which women were being
11 branded on the pubic area with a symbol that,
12 unbeknownst to them, was a man's initials. A picture
13 of Sarah Edmondson showing her brand was right below
14 the fold. Women were brought into the organization by
15 other women they knew under the guise of it being a
16 female empowerment group and provided damaging
17 material called collateral that could be used to
18 destroy their lives if they ever broke their
19 commitment to the group. The women who were joining
20 did not know that the organization was headed by a
21 man, Keith Raniere, or that he was having the women
22 branded with his initials. Now when I read this
23 article, I had never heard of NXIVM before. I had
24 never heard of Keith Raniere. But I immediately
25 recognized that there were potential federal crimes at



1 play. As a member of the Organized Crime and Gangs
2 Unit, I was trained to look for organizations that had
3 the outward appearance of legitimacy but were being
4 used to facilitate crimes. Reading that article,
5 something struck a chord with me. And at that time, I
6 had the power and the privilege to do something, and I
7 did. Looking back, I recognize that decision to act
8 as one of the most consequential of my life. So, I
9 went to the office, got on the internet, and I fell
10 down the NXIVM rabbit hole. Uh, my friend Tanya
11 Hajjar, who sat in the office next to me, had also
12 read The New York Times article, and she ended up
13 going on to try the case with me. Um, and so, she
14 also -- that day, we spent the day really researching
15 NXIVM and researching Keith Raniere. So, for years,
16 and this was quite shocking to me, there had been
17 reports of how dangerous Keith Raniere and NXIVM were.
18 Most significantly, the Albany Times Union had done a
19 series of investigative reports back in 2012 called
20 "Secrets of NXIVM." That -- and that was five years
21 prior, but there were sources going back as early as
22 2003. By the end of that day, I had learned that
23 Keith Raniere had started with a failed multi-level
24 marketing business called Consumers' Buyline and
25 reinvented himself as a self-improvement guru,



1 claiming to be a scientist, philosopher, and, no joke,
2 the smartest man in the world. His followers called
3 him Vanguard. NXIVM classes themselves operated like
4 other multi-level marketing schemes based on
5 recruiting new members into expensive courses, and
6 there were reports of people having nervous breakdowns
7 when attending these courses. I also learned that
8 NXIVM was incredibly well financed by several
9 heiresses, including Pam Cafritz, who had recently
10 died, and Clare Bronfman, heiress to the Seagram's
11 liquor fortune. Some of these women's fortunes had
12 been used to fund a litigation machine that attacked
13 perceived enemies of the group for years. Most
14 disturbingly, though, I read reports that Keith
15 Ranieri was a sexual predator who had abused at least
16 two underage girls. Now, most of the time, the way a
17 federal crime is prosecuted is it is brought to
18 prosecutors by a federal law enforcement agency, like
19 the FBI. So, the FBI will have been conducting an
20 investigation and then come to the U.S. Attorney's
21 Office once they have reason to believe crimes are
22 being committed and need a U.S. Attorney's Office on
23 board for search warrants and other next steps. This
24 was different. Here, I went to a trusted supervisor
25 who had herself brought some major victim-centric



1 cases, and we, together, reached out to an FBI agent
2 that she knew, Mike Weniger, which she had just worked
3 with to help us investigate. At the same time, I was
4 making calls to everyone I could publicly identify and
5 getting interviews set up. Within a couple of days,
6 Mike Weniger was at my office, and it was as if he had
7 walked in from central casting. He was tall, dashing,
8 and totally committed to doing the right thing. He
9 also brought a healthy dose of skepticism in those
10 early days, which is very important. I can assure
11 you, no one at the FBI or the Eastern District of New
12 York is bringing cases based on newspaper articles.
13 But soon, we were interviewing witnesses, and that
14 changed everything. I won't go through all the
15 evidence that we were uncover- -- uncovering during
16 that investigative period because we'll talk some of
17 what -- we'll talk about some of it as we go through
18 parts of the trial. But within a few weeks between
19 the interviews we were conducting and the subpoenas
20 and search warrant returns we were getting back,
21 including Keith Raniere's own emails showing that he
22 was the head of DOS and that it existed for his own
23 nefarious desires, we knew that there were very
24 serious crimes that had been committed, including sex
25 crimes. Now, when you're investigating a federal



1 crime as a prosecutor, you typically want to keep your
2 investigation covert for as long as possible,
3 presuming no one is in -- in any immediate physical
4 danger. That allows you to continue to gather
5 evidence and build the case while minimizing the risk
6 that targets of the investigation will destroy
7 evidence or try to flee. But by the end of 2017, the
8 fact of our investigation was being reported by both
9 the Albany -- Albany Times Union and The New York
10 Times. Raniere had gone off the grid in Mexico,
11 having dropped his phone and email, and we thought
12 there was a serious risk people were continuing to be
13 harmed or would be imminently. By then, we had enough
14 evidence to charge some crimes, so we couldn't wait
15 any longer. FBI Special Agent Mike Lever, who is here
16 tonight, was another one of the lead case agents who
17 worked with us right from the beginning. Together, we
18 swore -- he swore out a criminal complaint charging
19 Keith Raniere with sex trafficking and forced labor as
20 part of DOS. Mike is another Binghamton alum. We'll
21 forgive him for being a Watson rather than a Harpur
22 graduate. Um, and he's here today as a friend, and
23 he's dashing, too. You've probably heard the adage
24 that when the feds finally got Al Capone, it was on
25 tax evasion. For us, it was very important because of



1 the outsized influence Keith had on so -- Keith
2 Raniere had on so many people that we made clear he
3 was being prosecuted from the outset with the worst
4 crimes that he committed. Based on that complaint, a
5 federal magistrate judge issued an arrest warrant, and
6 with that warrant, the active hunt for Raniere began.
7 And about a month and a half later, he was discovered
8 in a small town on the western coast of Mexico. If
9 you've seen The Vow, season two, you know that, uh,
10 Keith Raniere was found by Mexican Federales hiding in
11 a closet, surrounded and protected by women he was
12 having a sexual relationship with who comprised the
13 first line of the secret organization DOS. In fact,
14 at trial, there was testimony from one of the women
15 who was there that there was to be a recommitment
16 ceremony that night where all the women were going to
17 perform oral sex on him. So, I do get an added
18 measure of satisfaction that that was interrupted.
19 Raniere was deported to the United States, arraigned
20 in Texas, and a few weeks later he appeared in
21 Brooklyn for the first time for arraignment. Now,
22 once Raniere was arrested, we were able to go fully
23 overt with our investigation, which meant that we
24 could execute physical search warrants at a number of
25 NXIVM properties. There's Mike Lever leading the



1 searches. Mike Weniger was monitoring remotely
2 because his amazing wife was due with baby number two
3 any day. And searches included Nancy Salzman's house,
4 who was the president of -- of NXIVM. There, we found
5 over half a million dollars in cash hidden around the
6 house. Also, inc- -- um, there was also a search of a
7 townhouse called 8 Hale, which was technically
8 considered the executive library, but really operated
9 as Raniere's sex lair. We collected 12 terabytes of
10 electronic information, which is the equivalent of 12
11 library floors worth of data. And what happened
12 within NXIVM is they recorded everything because they
13 thought that Keith Raniere would be like having Jesus
14 or Gandhi in your midst, and so you needed to take the
15 opportunity to memorialize everything that he said.
16 So, at the time of Raniere's arrest, we had been
17 presenting evidence to the grand jury for months by
18 then. But once he was arrested, we only had two weeks
19 to indict him. So, we did indict him. And at the
20 same time, we indicted Allison Mack along with him.
21 And this really brought, uh, major publicity to the
22 case, which was something that we had to deal with
23 because Allison Mack had starred in a television show
24 that was actually popular when I was at Binghamton
25 called Smallville. Um, and so, every time Allison



1 Mack was in court, there would be tons of press, and
2 it was quite an event. Um, at the same time, though,
3 we were continuing to investigate and continuing to
4 review the electronic data that had been seized.
5 Then, in July 2018, we superseded our indictment and
6 indicted four additional individuals, Nancy Salzman
7 and Clare Bronfman, who I already mentioned, and Nancy
8 Salzman's daughter, Lauren, and Kathy Russell, who was
9 a bookkeeper for NXIVM. Now, in addition to
10 standalone crimes, we were now charging Raniere and
11 the others with racketeering and racketeering
12 conspiracy. Racketeering is being part of a criminal
13 enterprise, just like if you had a mob or gang case.
14 Although I use NXIVM as shorthand and will continue to
15 do so today, the enterprise we charged was not NXIVM
16 or DOS specifically, but rather Keith Raniere and an
17 inner circle who together committed crimes for their
18 own personal and financial benefits, often as part of
19 pyramid organizations including NXIVM and DOS. We
20 showed that the enterprise operated by using certain
21 common means and methods, such as demanding absolute
22 commitment to Raniere, obtaining sensitive information
23 about members to use against them, and grooming women
24 and girls for Raniere. And I'll just note, um, you'll
25 see, uh, in the title of this lecture, "sex cult" was



1 put in quotes. And certainly, in the media, a lot of
2 people were calling it a cult. And when you talk to
3 experts in cults and high control groups, certainly
4 NXIVM does share a lot of similar traits. But for us,
5 it was very important to present this as a criminal
6 organization and to make sure that that was the focus.
7 So, I think except for other people's words, uh, when
8 we were at trial, we never used the word cult to
9 describe the organization. So, these are the charges
10 Keith Raniere faced at trial. For racketeering, you
11 need to prove that at least two predicate acts were
12 committed. We had 12. The crimes included DOS
13 related crimes, as well as crimes including identity
14 theft, hacking into perceived enemies' computers,
15 tampering with evidence in another litigation, tax
16 fraud, human trafficking, and sexual exploitation of a
17 minor, taking photographs of a 15-year-old girl while
18 she was underage. We won't talk about all of these
19 today. It was a six and a half week trial. And
20 frankly, I could talk about this for days straight,
21 um, but I am going to talk briefly about DOS, about a
22 woman, Daniela, who was trafficked, and about child
23 exploitation. So, starting with DOS. Now, there are
24 some different recruiting techniques that were used to
25 bring women into DOS. Typically, a woman would be



1 recruited by someone she knew, and the pitch would go
2 something like this. I notice you've been really
3 struggling with your personal growth. I'm part of
4 something that's really helped me. It's totally free.
5 I think it could really help you. Would you like to
6 be a part of it? And now, at this point, the person
7 being recruited would be told that, in order to join,
8 she would have to provide collateral so that they
9 would know that -- that she would be able to keep it a
10 secret. And at this point, many of these women
11 already had been introduced generally to the concept
12 of collateral in other NXIVM courses, with the idea
13 being that you want to keep your promise, and so this
14 is something that is going to keep you to your
15 promise. But the implication was certainly now we
16 have something on you that can be used against you
17 should you ever speak out. And so, often, because
18 these people were recruiting from people who they
19 knew, women would provide this first collateral. Now,
20 once someone had provided that initial collateral,
21 they would be told about DOS. And some of the things
22 they were told about were pretty extreme. They were
23 told it would be an organization of masters and
24 slaves. If people were resistant to that terminology,
25 they were told that was a product of their own



1 limitations and constructs of the words and that that
2 was their problem. Um, they did have to provide
3 additional collateral in order to join that would,
4 quote, "sink their lifeboats." So, enough stuff that
5 it would ruin all facets of the participant's life.
6 Professional, with their families. If they were
7 deeply religious, something that would affect their
8 religious affiliations. The women were told the
9 collateral didn't have to be true, just something that
10 could ruin these aspects of their lives. So, there
11 were people who turned over their bank accounts,
12 people who wrote letters -- signed letters addressed
13 to social services, ready to be mailed, falsely
14 accusing family members of child abuse. There were
15 videos made to look surreptitiously recorded where
16 people confessed to crimes, real or fake. And then,
17 there were lots of naked pictures and sex tapes where
18 a woman's face would be included in the picture or
19 tape. But for everything these women were told when
20 they were recruited, they were not told the ultimate
21 truth. They were told this was a women's empowerment
22 group when, in fact, it was headed by a man. Here,
23 you can see the structure and the first line, which
24 included Lauren and Allison and another woman, Nicki
25 Clyne, who you may have seen on The Vow and is still



1 loyal to Raniere. They were all already having sex
2 with Raniere and had been directly recruited by him.
3 So, when they were bringing the next line into the
4 organization, they knew exactly what they were hiding.
5 They were selling a lie of female empowerment when
6 really it was an organization headed by a man who was
7 having sex with all but one woman in the first line.
8 Some of the women were told that they would get a
9 brand, but they weren't told that it would be
10 Raniere's initials. Again, something that the first
11 line knew. None of the women who were recruited by
12 the first line were told that additional collateral
13 would be required monthly, and none of them were told
14 that sex would be any part of this group. So, the way
15 we charged DOS related crimes was that you had the
16 initial fraud, which caused people to turn over
17 valuable property, including their own naked photos.
18 And then you had extortion because once the collateral
19 was in place and new collateral was demanded, that new
20 collateral was being provided under the threat of the
21 prior collateral being released. And then, there was
22 sex trafficking and forced slave labor, which both
23 hinged on sex acts and other assignments that were
24 done under the coercive threat of the release of
25 collateral. Now, all trials involve storytelling, and



1 one of the biggest challenges for us was showing how
2 the victims could be indoctrinated to NXIVM and
3 Ranieri's manipulation such that they would even
4 provide the initial collateral. Most people who I
5 speak to, their first -- their first reaction is this
6 could never be me. This could never be my daughter.
7 It could never be my sister. But no one joins a cult.
8 People think that they are joining something that will
9 help themselves or others. People join at different
10 periods in their lives, sometimes seeking something,
11 sometimes with different levels of vulnerability. Um,
12 and when the women were being recruited into DOS, they
13 often had been part of NXIVM classes and teachings for
14 many years. In these classes and teachings, women
15 were often told that -- one of the -- one of the most
16 disturbing parts of NXIVM and Keith Ranieri's
17 teachings were that they were loaded with these
18 misogynistic teachings about how women behave and how
19 women are looking always to play a victim, how women
20 are always displaying weakness and crying, and
21 therefore looking for men to come save them. Whereas
22 men, from being little boys and not having the
23 privilege of being a girl, are instilled with better
24 values than women are. And these teach- -- teachings
25 were in almost every course that was taught in NXIVM.



1 So, when these women were being told to join this
2 organization that's going to free you from weaknesses,
3 this was something that the women already accepted.
4 And what was so dangerous about this language about
5 not being a victim and that everything that happens to
6 you is something that you've caused is that it makes
7 it impossible for somebody to identify abuses. Women
8 were told that anything bad that happened to them,
9 including sexual assault, they had caused in some way,
10 which exonerates anyone who wants to take advantage of
11 this and cause harm. Now, DOS wasn't only about sex.
12 Keith Raniere's vision was an organization of
13 blackmailed powerful women who could perform work for
14 him and do things like influence elections. It was
15 kind of a grand vision of what he had already been
16 doing for years, having women operate at his behest.
17 But here, he was commanding complete loyalty. At
18 bottom, Keith Raniere was very insecure. We showed
19 this through many, many messages. He was very
20 jealous, and he wanted to make sure no woman he was
21 with would ever leave the organization or ever be with
22 another man. DOS was a way to secure this, especially
23 right around the time of the death of his primary
24 companion, Pam Cafritz, who had been the chief enabler
25 of his crimes. But one of Raniere's motivations for



1 DOS was clearly sex. And what we saw was that women
2 in DOS were being ordered to do things that were in
3 line with what Keith Raniere found sexually pleasing,
4 again, not knowing Keith Raniere was part of the
5 organization. So, they would be ordered to grow out
6 their pubic hair. They were ordered to count
7 calories, becoming exceedingly thin. They were not
8 allowed to have sex with anyone else, which was a
9 requirement Raniere imposed on all of his sex
10 partners. They would have to pose for pictures that
11 served as collateral that they didn't know was -- was
12 -- were being shared with Raniere. And Raniere was
13 known for collecting images of his partners over the
14 years. It was astounding to see the pictures the
15 women from DOS in 2015 were being required to take,
16 and they could just as easily have been the women in
17 the photos from the 90s or early 2000s in terms of
18 body type, um, pubic hair, poses, except for things
19 like a giant cell phone in the background or a VCR in
20 the background. So, before the investigation was
21 launched, Keith Raniere and NXIVM had publicly stated
22 that Raniere had nothing to do with DOS. By the time
23 we got to trial, he -- he couldn't maintain that lie
24 anymore because we had so much evidence from his own
25 emails and recordings where his involvement was



1 incontrovertible. So, I'm going to play one of the
2 recordings from trial now.

3 Raniere: Do you think the person being branded should be
4 completely nude and sort of held to the table like a -
5 - sort of almost like a sacrifice. I don't know if
6 that -- that's a feeling of submission, you know. Uh,
7 we'd also, of course, (inaudible - 00:32:28) and
8 videoing it, uh, from different angles or whatever to
9 give us collateral. Probably should be in a more
10 vulnerable position. (Inaudible - 00:32:49) laying on
11 the back, legs slightly -- or legs spread straight
12 like feet -- feet being held to the side of the table,
13 hands probably above the head being held, almost like
14 being tied down, like sacrificial -- whatever. And
15 the person should ask to be branded.

16 Mack: Okay.

17 Raniere: Should say, please, brand me. It would be an honor or
18 something like that. An honor I want to wear for the
19 rest of my life. I don't know.

20 Mack: Okay.

21 Raniere: And they should probably say that before they're held
22 down, so it doesn't seem like they are being coerced.

23 Penza: So, what was so powerful about this recording and
24 having his own voice with Allison Mack in that -- in
25 that recording, is that we had had a victim describe



1 exactly what it was like to get branded, and then we
2 were able to play this recording, the victim never
3 having heard it. And we hear Keith Raniere in his own
4 voice describing exactly what the victim had described
5 about the branding, about how she was positioned,
6 about what happened. Also, here, he's talking about
7 the branding being his idea. He's talking about
8 collateral. And he importantly says that the women
9 should say master, please brand me so it doesn't seem
10 like they're being coerced. This was key because we
11 wanted to show that his defense at trial, which was
12 this was all consensual, was something that Raniere
13 had been trying to plant from the early days of DOS.
14 We had additional evidence where Raniere admitted the
15 brand was his initials and saying that if the initials
16 were Albert Einstein's or Abraham Lincoln's, no one
17 would care. Now, here's another example of how we
18 used Keith Raniere's own words to convict him at
19 trial. So, Raniere here is talking to one of the
20 first line slaves, Camila, who I'm going to talk more
21 about in a second. And if you read them, "I think it
22 would be good for you to own a F toy slave for me that
23 you could groom and use as a tool to pleasure me."
24 And then, at the end, "Get a slave. You're her
25 master." It is impossible to read these words, walk



1 away from them, and say that DOS did not exist, at
2 least in part, to groom women for sex with Ranieri.
3 That then brings us to Nicole, one of our other key
4 witnesses at trial. Key -- Nicole was a woman who was
5 Ranieri's physical ideal -- ideal. Even before
6 joining DOS, she was exceptionally thin. She was
7 exceptionally beautiful. The reality was that
8 although Ranieri had had many women over the years, he
9 was not getting young, beautiful women just showing a
10 willingness to commit to him anymore. Nicole was a
11 struggling actress when she was first introduced to
12 NXIVM curriculum. Allison Mack was a mentor to her
13 and seemed to be living the life Nicole dreamed of,
14 living as a professional actress -- working as a
15 professional actress when they met. Nicole was
16 suicidal when Allison Mack recruited her into DOS.
17 Nicole tried to get out, and Allison told her she
18 could not and told her a story about Allison's own
19 master, who Nicole did not know was actually Keith
20 Ranieri, threatening release of a sex tape she had
21 provided as collateral. At trial, we showed evidence
22 of Allison communicating with Keith about making sure
23 Nicole stayed in. And almost immediately after Nicole
24 tried to leave DOS Allison began giving Nicole
25 assignments that involved her interacting with Keith



1 Raniere. This culminated with Nicole being assigned
2 to say that to -- to walk with Keith Raniere and tell
3 him that she would do anything he asked of her. That
4 night, Raniere blindfolded Nicole and drove her to a
5 location where he tied her to a table. Nicole
6 testified to her horror and terror that she realized
7 someone else was in the room and began performing oral
8 sex on her. Raniere circled the table while this was
9 happening. Now, the next slide. This image shows the
10 importance of continuing to investigate. Not long
11 before trial, while still combing through terabytes of
12 data, we found this -- this picture in Raniere's email
13 from the night of the incident. Nicole could never
14 have known of the existence of this photo, so it was
15 exceptional corroboration of what she said happened.
16 You see the table. You see the ties that were used to
17 hold her down. And at trial we proved that what you
18 see in this room, the -- all of the different items,
19 including the rug and the lamps, showed that this was
20 actually Camila's own apartment that Keith Raniere had
21 kept for her under a secret name. And so, tying that
22 up with the messages you just saw about Camila
23 grooming a sex slave for Keith Raniere, this was very
24 powerful evidence at trial. And even more damning was
25 you can see that a video camera was pointed right at



1 the table. Again, something Nicole didn't even know
2 about. Other women in DOS also received the seduction
3 assignment. And another victim, Sylvie, who was the
4 first witness at the trial, was also young, beautiful,
5 thin, and had avoided Ranieri's advances for years,
6 finding him creepy. But once she was collateralized
7 and ordered to seduce Ranieri, she ended up with him
8 performing oral sex on her as well. None of this was
9 cons- -- con- -- coincidental, and none of this was
10 consensual. These women would never have been
11 intimate with Ranieri if not for the collateral. I
12 realize I'm running short on time and still have a lot
13 to say, so I will try and, uh, move -- move very
14 quickly now. Um, Dr. Hughes was an expert witness
15 that we called at trial. Her testimony was very
16 important because it put into perspective some of the
17 behaviors that victims often go through that may seem
18 counterintuitive to somebody who is not familiar with
19 victim behavior. So, in particular, in this case, we
20 saw that there was continued communication from a lot
21 of the victims and a continuing intimacy, um, with
22 many of the victims with Keith Ranieri. We saw love
23 messages, things like that. And what Dr. Hughes was
24 able to explain to the jury is that these are very
25 common, especially when there are abuses of power by



1 somebody who has so much control over your life. I
2 just want to quickly touch upon Daniela. Daniela is
3 Camila's sister. Um, of all of the crimes that Keith
4 Raniere committed, the way that he destroyed Camila
5 and Daniela and their family really does stand out as
6 exceptional. So, Daniela is an absolutely brilliant
7 woman. She was -- she had a scholarship to a high
8 school in Switzerland when her family got involved in
9 NXIVM. She ended up being groomed by Keith Raniere
10 when -- before she turned 18. Um, a week after her
11 18th birthday, Keith Raniere had sex with her at the
12 old Consumers' Buyline offices on a mattress, um, that
13 was dirty. And this was -- she was one of the three
14 sisters that he was having sex with. Ultimately, uh,
15 Daniela fell out of favor with Raniere when she became
16 interested in a boy her age. At the time, Keith
17 Raniere was about in his mid-40s. And ultimately,
18 ended up confined to a room on Keith Raniere's orders
19 in her house with her parents there. They were also
20 very indoctrinated by Keith Raniere. And she was told
21 that if she left the room, she would be sent back to
22 Mexico without any papers and without any money. And
23 at this time, Daniela was illegally in the country.
24 She had been brought there illegally by Keith Raniere.
25 And so, ultimately, two years later, she does leave



1 the room and -- excuse me. And when she does leave
2 the room, as he had threatened, Keith Raniere orders
3 that she be sent back down to Mexico and sends her
4 along with one of -- her father and also a woman, who
5 was another one of his enablers at the time, to ensure
6 that she actually did go down to Mexico. Now,
7 finally, in terms of crimes, I just want to talk
8 briefly about another crime involving Camila. So, we
9 talked about Camila's involvement in DOS, but Camila
10 had been severely victimized by Keith Raniere. And at
11 the time of trial, we did not have access to Camila.
12 So, the defense did have access to Camila, um, at
13 least at a certain point in the investigation. And
14 when we tried to have the FBI go down -- when -- the
15 FBI did go down to Mexico to try to meet with Camila,
16 and when they did, uh, the defense team had
17 intercepted at a certain point, and a lawyer, paid for
18 by Clare Bronfman, convinced Camila that she should
19 not speak to the FBI. But at trial, we did introduce
20 the pictures of Camila from age 15 that did constitute
21 child pornography. And in addition to the metadata
22 that was on the pictures that were found on a hard
23 drive in the 8 Hale, the sex lair that I described to
24 you earlier, we had all of this evidence that
25 corroborated the fact that these pictures were taken



1 when Camila was 15 years old. So, (inaudible -
2 00:43:32). So, here we had -- we didn't have a
3 testifying victim, but in addition -- so, the photos
4 themselves, we were -- identified the victim. We used
5 her face. And Daniela was able to identify her own
6 sister in the photos. We proved that Camila had had
7 severe appendicitis when she was 16 that caused a scar
8 that you can see in even very recent pictures of her
9 abdomen, and the scar was not visible in the pictures
10 that made up the child pornography charge, providing
11 additional proof that they were taken when she was 15.
12 The photos of Camila were found in a labeled folder
13 called "Studies" on this hard drive that also had
14 folders of other sex partners of Keith Raniere at the
15 time. All of the photos were similarly posed and
16 taken around the same dates. Keith Raniere himself
17 was in some of those photos. And two of the subjects,
18 Daniela and Lauren, testified that he took photos of
19 them at the same time period, and then those photos
20 were, in fact, on the hard drive. In her medical
21 records, Camila had said that she had had a sexual
22 partner since she was underage, and we knew from other
23 evidence that there was only one. And the lies -- in
24 the medical records, there were lies about who her
25 sexual partner was that were the same lies that



1 Daniela and other women had been told to tell when
2 they sought medical -- when -- when they sought
3 medical treatment. And I think one of the most
4 devastating pieces of -- of evidence on the Camila
5 charge was that Daniela herself testified. And she
6 testified that this was very shameful but that Keith
7 Ranieri himself told her that he was having sex with
8 Camila when Camila was underage and that, at the time,
9 Daniela actually felt jealousy that Keith Ranieri had
10 made her wait until she was 18. And so, the impact of
11 that to the jury, of her sister actually admitting
12 that, was a really powerful piece of evidence. And
13 then, we had more admissions by Keith Ranieri himself
14 here, talking to Camila about having been her husband
15 for 8.75 years. Then talking about him having had her
16 when she was an inexperienced 15-year-old. And there
17 were other conversations where he talked about holding
18 on to the original photos from way back when. And
19 this didn't even account for what we couldn't
20 introduce, including evidence of the other underage
21 girls who he had abused many years before NXIVM, um,
22 at least one of whom was prepared to testify at the
23 trial. Uh, Judge Garaufis held that, you know, the
24 prejudice was too great to introduce that at trial.
25 But again, Pam Cafritz had been involved in the



1 grooming of that girl, and she -- and Keith Raniere
2 had had sex with her when she was 13. So -- and we
3 had another woman who was 15 when he had sex with her.
4 So, the evidence even that wasn't presented at trial
5 all pointed to the fact that Keith Raniere had
6 sexually abused Camila. And then, um, I'm going to
7 wrap it up in just a couple of minutes. Um, we had
8 more of Keith Raniere's own teachings about sexual
9 abuse. And so, I'll just let this one play (inaudible
10 - 00:47:11).

11 Raniere: The thing -- for example, sexual abuse. In some
12 states, it's their -- their ages. It's the age of
13 consent. Some states it's 17. Some parts of the
14 world, it's 12. Some parts of the world, it's --
15 right. So, what's abuse in one area is not abuse in
16 another. But what is it really? Abuse is, does the
17 person -- is the person a child or is the person
18 adult-like? Does the person, um, have a certain type
19 of understanding, of cognition, morality to make such
20 a choice? Because that choice has effects potentially
21 on them, physically, but also, um, it effects
22 (inaudible - 00:47:47) society later. Often, when we
23 counsel people who were, say, children of what we'll
24 abuse -- you know, the little child -- some little
25 children are perfectly happy with it until they find



1 out what happened to them later in life. And then
2 it's more society that abuses them than actually the
3 parent.

4 Penza: So, this type of teaching, this type of excusing, um,
5 sexual abuse as a societal construct was something
6 that came up frequently in NXIVM treat- -- in NXIVM
7 teaching. And you have to remember that these were
8 being taught to groups of people, groups of -- of
9 women. And this, in particular -- this exact lecture,
10 um, I'll show you in -- I'm going to skip ahead for a
11 second. That exact, um, statement that you heard from
12 Keith Raniere, we showed a clip of trial -- at trial
13 of Nancy Salzman actually parroting those exact words
14 to this group of women and underage girls on the left.
15 So, these were underage Mexican girls on the left.
16 And at the time, we really were submitting to the jury
17 that there was continued criminality here and that
18 Keith Raniere was looking to groom the next victim.
19 This was just another example. So, you see here, um,
20 Keith Ran- -- Keith Raniere's teaching of whether --
21 if there's no disease transfer or procreation, ask the
22 question, should a child -- child be allowed to
23 masturbate an adult? Should the adult be allowed to
24 masturbate the child? And let the students think for
25 themselves. We're raising the issues on how to think



1 about this issue and not generate an opinion. And so,
2 all of this went into the grooming that Keith Raniere,
3 um, was doing of the people in his group. And so, we
4 won. Um, uh, Keith Raniere was convicted on every
5 single count, every single predicate act. And this
6 was -- I just -- this was, uh, my girlfriends from
7 Binghamton. So, this is our group chat. And this is
8 in the, like, 45 minutes of waiting for a verdict.
9 You can see that, you know, I'm asking -- you know,
10 we're talking about whether it's a good sign about the
11 jury coming back. And, you know, they're all saying
12 how proud they are of me. And it was just really
13 wonderful. They were there with me from the
14 beginning. And so, being able to be here -- and I'm
15 sure some of them are watching. Hello, all of you.
16 Um, but it's just really wonderful to be back here
17 because it is such a special place. Um, and they were
18 right along -- my Binghamton friends were there right
19 along with me. And, of course, my other Binghamton
20 friend, Mike, was right there along with me, too. Um,
21 and so, I know I'm way over, so I'm just going to wrap
22 it up. But I'm just very grateful to be here. And I
23 just would encourage, uh, all the students here that
24 when there is an opportunity in your life to make a
25 difference, when you do have the privilege of being



1 able to act on something, that you do so. And that
2 when something doesn't feel right to you, that you
3 trust your instincts on that, and that you make sure
4 you are looking out for places where there is coercive
5 control and where there is an intolerance for other
6 ideas because that really is where abuses happen.
7 Thank you all so much.

8 Klin: Maybe just one question from this group and then maybe
9 one from the online.

10 Penza: Sure. Happy to. Anyone have a question? Yes, Mike.

11 Mike: Just, you know, we see this coercive control
12 (inaudible - 00:51:36) degrees. Uh, and this is an
13 extreme (inaudible - 00:51:38) example. What advice
14 do you have for us if we see people, you know, in
15 similar type relationships that are -- that are in
16 this? What -- what could we do to -- to help that
17 person (inaudible - 00:51:49)?

18 Penza: Yeah. I think that's an excellent question. And I
19 think really having compassion for the situation,
20 being very gentle about it at first is usually the
21 most important step. I think being there for people.
22 So much coercive control happens because of isolation.
23 That's how abusers operate, is they try and separate
24 people from their friends and family so that they --
25 they are surrounded only by people who are reinforcing



1 the coercion, or so that they are left alone in the
2 abusive relationship. So, I think spending time not -
3 - trying not to attack what's happening, even though I
4 think that can be very difficult, and really trying to
5 take it slow. Of course, if somebody is being
6 physically injured, it's very difficult to do that.
7 And I think, you know, that's why we need law -- law
8 enforcement to get involved earlier in situations like
9 with what was happening with NXIVM. But I think in
10 many situations, really just having that compassion
11 for the individual and spending time and bringing
12 those -- gently bringing those resources to the person
13 so that they don't back away and retreat further to
14 the coercive individual.

15 (Crosstalk)

16 Female: Yeah. So, last one, um, from -- we have a couple
17 coming in, but we're just going to ask the one that's
18 a little general. So, um, someone is asking just why
19 maybe some of the people who were impacted didn't, um,
20 testify at trial.

21 Penza: Sure.

22 Female: Some of the women that may have been impacted but
23 didn't testify.

24 Penza: Yeah. So, I think, um -- I -- I do -- when I describe
25 what type of lawyer I am, I am first and foremost a



1 trial attorney. And so, what you really have to do
2 when you are putting together a trial is really engage
3 in some editing. And so, you're not going to just
4 dump every single possible witness at a trial, right?
5 You're really trying to figure out who do I need to
6 prove the elements of the charges that I brought, who
7 is going to help create a compelling narrative without
8 overwhelming the jury because we already were at a six
9 and a half week trial. I think sometimes people ask
10 me, well, you didn't talk about this, you didn't talk
11 about that at trial. But that wasn't my job. I
12 wasn't making a documentary. I was very much proving
13 up the crimes that we had charged. And so, that's
14 really how we ended up choosing the witnesses. They
15 were the ones that we thought would be the most
16 impactful.

17 Klin: So, I guess if anybody in the room still has
18 questions, please stay and ask. Um, those of you who
19 want to go mingle, please, uh, come to the reception.
20 Appreciate everybody being here. I can't thank the
21 virtual audience, but (inaudible - 00:54:41) so
22 easily. Um --

23 Penza: Thank you.

24 Klin: But mostly, thank you to you, Moira, for a fascinating
25 talk, for the work that you do, and for being with us



1 today.

2 Penza: Thank you, Dean.

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