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Clerk of the Circuit Court
of Fairfax County, VA

CONFIDENTIAL

Transcript of Christi Dembrowski

Date: February 22, 2022

Case: Depp, II -v- Heard

Planet Depos

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

34949

1. VIRGINIA:

2. IN THE CIRCUIT COURT OF FAIRFAX COUNTY

3. ----- X

4. JOHN C. DEPP, II, :

5. Plaintiff and, : CIVIL ACTION NO.

6. Counter Defendant, : CL-2019-0002911

7. v. :

8. AMBER LAURA HEARD, :

9. Defendant and :

10. Counter Plaintiff. :

11. ----- X

12.

13.

14. *** CONFIDENTIAL ***

15. VIDEOTAPED DEPOSITION OF CHRISTI DEMBROWSKI

16. Conducted Virtually

17. February 22, 2022

18. 12:38 p.m. EST

19.

20. Job No.: 433437

21. Pages: 1-210

22. Reported By: KRISTI R. WEAVER, RPR

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

1 Videotaped deposition of CHRISTI DEMBROWSKI,
2 conducted virtually.

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10 Pursuant to notice, before Kristi R. Weaver,
11 RPR, Notary Public in and for the Commonwealth of
12 Virginia.

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C O N T E N T S

EXAMINATION OF CHRISTI DEMBROWSKI	PAGE
By Mr. Treece	9

E X H I B I T S

(EXHIBITS APPENDED TO THE TRANSCRIPT)

DEMBROWSKI DEPOSITION EXHIBIT	PAGE
Exhibit 1 Deposition subpoena	12
Exhibit 2 Payment ledger	54
Exhibit 3 Texts ALH 17940-17943	29
Exhibit 4 Texts ALH 17944-17948	61
Exhibit 5 Texts ALH 17928-1939	88
Exhibit 6 Texts DEPP 11246-11301	115
Exhibit 7 E-mail DEPP 11487-11489	156
Exhibit 8 Accounts payable vendor detail	167
Exhibit 11 E-mails DEPP 19234-19235	168
Exhibit 12 E-mails DEPP 19237	174
Exhibit 13 E-mails DEPP 19239	178
Exhibit 18 E-mail DEPP 19209	181
Exhibit 19 E-mails DEPP 20089	183

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S

(EXHIBITS APPENDED TO THE TRANSCRIPT)

DEMBROWSKI DEPOSITION EXHIBIT	PAGE
Exhibit 20 E-mails DEPP 19216	185
Exhibit 21 E-mail UTA 115	187
Exhibit 22 E-mail UTA 120	188
Exhibit 23 E-mail DEPP 20090	190

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

8

1	P R O C E E D I N G S	12:37:34
2	THE VIDEOGRAPHER: Here begins disk number	12:37:34
3	one in the video deposition of Christi Dembrowski	12:37:36
4	in the matter of John C. Depp, II versus Amber	12:37:40
5	Laura Heard in the Fairfax County Circuit Court of	12:37:45
6	Virginia, Case Number CL-2019-0002911.	12:37:49
7	Today's date is February 22nd, 2022. Time	12:37:58
8	on the video monitor is 12:38 p.m. Eastern.	12:38:03
9	The videographer is Drew Halton,	12:38:07
10	representing Planet Depos.	12:38:09
11	All participants are attending remotely.	12:38:10
12	Would counsel please voice identify	12:38:12
13	themselves and state they represent.	12:38:14
14	MR. TREECE: Joshua Treece on behalf of	12:38:16
15	defendant and counter-claimant Amber Heard. And	12:38:20
16	with me today I have my cocounsel and colleague,	12:38:23
17	Ben Rottenborn, on behalf of Ms. Heard.	12:38:26
18	MS. VASQUEZ: Camille Vasquez of Brown	12:38:29
19	Rudnick on behalf of John C. Depp, II. And with	12:38:32
20	me I have Yarelyn Mena.	12:38:35
21	MS. HICKOX: And I'm Cindy Hickox on	12:38:38
22	behalf of the deponent, Christi Dembrowski.	12:38:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

9

1	THE VIDEOGRAPHER: The court reporter is	12:38:43
2	Kristi Weaver, representing Planet Depos.	12:38:45
3	Would the reporter please swear in the	12:38:47
4	witness.	12:38:48
5	CHRISTI DEMBROWSKI, called as a witness,	12:38:48
6	having been first duly sworn, was examined and	12:38:48
7	testified as follows:	12:38:48
8	EXAMINATION	12:39:12
9	BY MR. TREECE:	12:39:12
10	Q Good morning, Ms. Dembrowski. As you	12:39:14
11	know, my name is Josh Treece. I represent Amber	12:39:17
12	Heard in this litigation.	12:39:20
13	I wanted to ask you first if you'll state	12:39:22
14	your full name and address for the record,	12:39:24
15	residential address.	12:39:28
16	A Christi Dembrowski. My address is 6529	12:39:29
17	Santa Rosa Road, Camarillo, California, 93012.	12:39:36
18	Q And what is your work address?	12:39:41
19	A Well, I'm working remotely.	12:39:45
20	Q Okay. So you're working from home?	12:39:47
21	A Yes.	12:39:49
22	Q All right. Now, have you had your	12:39:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

10

1	deposition taken before?	12:39:52
2	A No.	12:39:56
3	Q In any other case, not just in connection	12:39:58
4	with this case.	12:40:00
5	A Oh, yes, once.	12:40:01
6	Q Okay. So you've been deposed. When were	12:40:02
7	you deposed?	12:40:04
8	A I don't recall. A few years ago. I don't	12:40:06
9	recall the dates.	12:40:08
10	Q Do you recall what that was in connection	12:40:09
11	with?	12:40:11
12	A Yes.	12:40:14
13	Q And what was that?	12:40:15
14	A It was in connection with, excuse me, a	12:40:17
15	different lawsuit for Bloom Hergott, I believe.	12:40:23
16	Q And just so I understand, are you saying	12:40:32
17	that you were deposed in connection with the	12:40:34
18	lawsuit that Johnny Depp filed against Bloom	12:40:36
19	Hergott?	12:40:42
20	A Yes.	12:40:42
21	Q And what was the nature of your testimony	12:40:46
22	generally, if you can recall? What were you asked	12:40:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

11

1	about? What was the basis of your knowledge and	12:40:52
2	involvement?	12:40:55
3	MS. VASQUEZ: Objection; vague, compound.	12:40:56
4	MS. HICKOX: Join.	12:41:01
5	MS. VASQUEZ: Unintelligible.	12:41:02
6	BY MR. TREECE:	12:41:05
7	Q Let me ask you, Ms. Dembrowski, do you	12:41:05
8	recall if there was a central focus of topics for	12:41:08
9	your deposition in that case?	12:41:12
10	MS. VASQUEZ: Same objections.	12:41:15
11	MS. HICKOX: Join.	12:41:17
12	THE WITNESS: I answer?	12:41:24
13	MS. HICKOX: You can answer if you	12:41:25
14	understand the question.	12:41:27
15	THE WITNESS: I sort of -- I'm not sure if	12:41:28
16	I understand the question, but here's what I would	12:41:30
17	answer: It was -- for me it was mostly to talk	12:41:32
18	about a list of projects and the involvement of	12:41:36
19	the legal team, Bloom Hergott.	12:41:42
20	BY MR. TREECE:	12:41:46
21	Q Okay. All right. Well, we don't need to	12:41:46
22	go too far down that road.	12:41:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

12

1	You understand that you're here today	12:41:50
2	pursuant to a subpoena; is that correct?	12:41:52
3	A Yes.	12:41:54
4	Q And I'm going to move an exhibit over into	12:41:55
5	the Chat box, and I can also share that on the	12:41:58
6	screen.	12:42:03
7	(Exhibit 1 was marked for identification	12:42:03
8	and is attached to the transcript.)	12:42:03
9	BY MR. TREECE:	12:42:17
10	Q Ms. Dembrowski, are you able to view the	12:42:17
11	screen?	12:42:19
12	A Yes.	12:42:22
13	Q Do you recognize this document?	12:42:23
14	And I don't know if you have the ability	12:42:27
15	to download it on your end on the witness side. I	12:42:29
16	put it in a Chat box so you have access to it.	12:42:32
17	Do you recognize this as your subpoena for	12:42:35
18	today's appearance?	12:42:38
19	A I believe so.	12:42:43
20	Q Okay. And I can go back to the top.	12:42:44
21	All right.	12:42:47
22	A Yes.	12:42:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

13

1	Q All right. And let me ask you, what have	12:42:52
2	you done to prepare for today's deposition?	12:42:54
3	MS. VASQUEZ: Objection; assumes facts,	12:42:57
4	vague.	12:42:59
5	BY MR. TREECE:	12:43:03
6	Q You can answer.	12:43:03
7	A Okay. Sorry.	12:43:05
8	Mainly to make sure that I understood --	12:43:07
9	since I've never done a remote, you know,	12:43:11
10	deposition before so that I understood the process	12:43:16
11	and to make sure that my internet was working,	12:43:18
12	because I was having trouble with that.	12:43:20
13	MS. HICKOX: I'm just going to advise,	12:43:22
14	Christi, make sure to listen to his question.	12:43:24
15	He's asking what you did to prepare, if anything.	12:43:26
16	THE WITNESS: I didn't really --	12:43:33
17	BY MR. TREECE:	12:43:36
18	Q Let me ask you -- let me ask you this:	12:43:36
19	Did you review any documents in preparation for	12:43:38
20	today's deposition?	12:43:41
21	A No.	12:43:43
22	Q Have you reviewed the Complaint or	12:43:44

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

14

1	Counterclaim in this lawsuit?	12:43:49
2	MS. VASQUEZ: Objection; asked and	12:43:52
3	answered.	12:43:54
4	THE WITNESS: I haven't really reviewed	12:43:58
5	documents.	12:44:02
6	BY MR. TREECE:	12:44:03
7	Q All right. And I wanted to ask you, you	12:44:03
8	have siblings, correct?	12:44:08
9	A Yes.	12:44:09
10	Q Who are your siblings?	12:44:10
11	A Excuse me.	12:44:13
12	I have a brother, Danny; a sister, Debbie;	12:44:14
13	and my younger brother, Johnny.	12:44:18
14	Q Do you have children?	12:44:22
15	A Yes.	12:44:24
16	Q Who are your children?	12:44:25
17	A I have four daughters.	12:44:29
18	Q And who are they?	12:44:33
19	MS. HICKOX: Objection; relevance,	12:44:35
20	privacy. I don't understand why you need to know	12:44:38
21	the names of these -- of her children.	12:44:41
22	MS. VASQUEZ: Join.	12:44:43

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

15

1	BY MR. TREECE:	12:44:44
2	Q You still need to answer.	12:44:44
3	MS. VASQUEZ: Actually -- well, I'll let	12:44:47
4	Ms. Hickox instruct her witness not to answer	12:44:49
5	on -- in California, which is where this	12:44:53
6	deposition is, the rules are governed by, privacy	12:44:55
7	is a valid objection; and she could instruct her	12:44:58
8	witness not to answer.	12:45:01
9	MS. HICKOX: And I will do so. I'm going	12:45:02
10	to instruct Ms. Dembrowski not to answer on	12:45:04
11	privacy grounds.	12:45:06
12	BY MR. TREECE:	12:45:07
13	Q Are your children under the age of 18?	12:45:07
14	A No.	12:45:10
15	Q So all of your children are adults?	12:45:12
16	A Yes.	12:45:14
17	Q What is your current occupation?	12:45:23
18	A I work at a production company.	12:45:28
19	Q What's the name of the production company?	12:45:32
20	A Infinitum Nihil.	12:45:34
21	Q And is that a production company owned by	12:45:37
22	your brother, Johnny Depp?	12:45:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

16

1	A Yes.	12:45:42
2	MS. VASQUEZ: Objection.	12:45:42
3	Sorry, Ms. Dembrowski. I may be objecting	12:45:44
4	to Mr. Treece's questions, as your counsel may be	12:45:48
5	as well. So if you'd just give us a few	12:45:52
6	seconds --	12:45:54
7	THE WITNESS: Okay.	12:45:54
8	MS. VASQUEZ: -- to lodge our objections,	12:45:55
9	I'm sure the court reporter and Mr. Treece would	12:45:57
10	appreciate that.	12:45:59
11	THE WITNESS: Okay. Sorry.	12:46:00
12	MS. VASQUEZ: I'll interpose a late	12:46:02
13	objection of calls for a legal conclusion and	12:46:04
14	calls for speculation.	12:46:07
15	MS. HICKOX: And I'll join.	12:46:09
16	BY MR. TREECE:	12:46:11
17	Q Is the production company Infinitum Nihil	12:46:11
18	controlled by your brother, Johnny Depp?	12:46:15
19	MS. VASQUEZ: Same objections.	12:46:17
20	MS. HICKOX: Join.	12:46:19
21	THE WITNESS: I don't understand	12:46:22
22	controlled, so...	12:46:23

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

17

1.	BY MR. TREECE:	12:46:25
2	Q Does he call the shots with respect to	12:46:25
3	what Infinitum Nihil needs to be doing?	12:46:30
4	MS. VASQUEZ: Objection.	12:46:33
5	MS. HICKOX: Same objections.	12:46:34
6	MS. VASQUEZ: Yeah, same objections. And	12:46:35
7	I'm going to add vague and ambiguous.	12:46:37
8	Ms. Dembrowski, if you understand the	12:46:42
9	question, I guess you can answer it.	12:46:43
10	THE WITNESS: I think we have a -- there's	12:46:46
11	a team of us that work -- that we all work	12:46:51
12	together and make decisions.	12:46:54
13	BY MR. TREECE:	12:46:56
14	Q And -- and does the team consider Johnny	12:46:57
15	Depp the boss?	12:46:59
16	MS. VASQUEZ: Same objections.	12:47:02
17	MS. HICKOX: Join. Also calls for	12:47:03
18	speculation.	12:47:06
19	THE WITNESS: He would be considered, you	12:47:10
20	know, I suppose -- I suppose the boss. But, you	12:47:15
21	know, not necessarily a boss, more of a -- you	12:47:19
22	know, he's -- he's had -- you know, he's -- he's	12:47:25

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

18

1	head of the company, I suppose.	12:47:29
2	BY MR. TREECE:	12:47:30
3	Q And do you consider Johnny Depp the boss	12:47:30
4	of the company?	12:47:32
5	MS. VASQUEZ: Objection; relevance.	12:47:36
6	BY MR. TREECE:	12:47:39
7	Q And I'll -- I'll refrain that.	12:47:39
8	Do you consider Johnny Depp the head of	12:47:41
9	the company?	12:47:42
10	MS. VASQUEZ: Calls for a legal	12:47:44
11	conclusion, vague, and relevance.	12:47:46
12	MS. HICKOX: Join.	12:47:48
13	THE WITNESS: I've always considered him	12:47:54
14	as -- as, you know, not necessarily the boss; but	12:48:00
15	he was, you know, the key player for all of us.	12:48:03
16	He's -- you know, because we all work together,	12:48:07
17	so...	12:48:11
18	BY MR. TREECE:	12:48:11
19	Q It's his company, is it not?	12:48:11
20	MS. VASQUEZ: Objection; argumentative,	12:48:13
21	asked and answered, calls for a legal conclusion,	12:48:16
22	and vague.	12:48:20

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

19

1 MS. HICKOX: Join. 12:48:20

2 THE WITNESS: I -- I suppose it is. 12:48:24

3 BY MR. TREECE: 12:48:28

4 Q And would you -- let me ask you this: Do 12:48:28

5 you work for any other company other than 12:48:32

6 Infinitum Nihil? 12:48:35

7 A No. 12:48:38

8 Q Do you have any other sources of income 12:48:39

9 other than from Infinitum Nihil? 12:48:41

10 A No. Job wise, no. 12:48:48

11 Q And you would agree with me that your 12:48:53

12 financial interests then are aligned with 12:48:56

13 Infinitum Nihil's financial interests, correct? 12:48:59

14 MS. VASQUEZ: Objection; argumentative, 12:49:01

15 vague. 12:49:05

16 MS. HICKOX: Join. 12:49:12

17 THE WITNESS: I'm sorry. I'm not really 12:49:15

18 understanding exactly the question. 12:49:20

19 BY MR. TREECE: 12:49:21

20 Q Okay. Well, let me ask it this way: You 12:49:22

21 would agree with me that your financial interests 12:49:24

22 are aligned with your brother's financial 12:49:26

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

20

1	interests because he owns the company that you	12:49:28
2	work for and from which you get paid, correct?	12:49:30
3	MS. VASQUEZ: Objection; compound,	12:49:33
4	argumentative, asked and answered.	12:49:35
5	MS. HICKOX: Join. And also assumes	12:49:39
6	facts.	12:49:41
7	THE WITNESS: I would say I'm employed.	12:49:45
8	BY MR. TREECE:	12:49:48
9	Q In other words, you're employed by your	12:49:49
10	brother through a company, correct?	12:49:53
11	MS. VASQUEZ: Objection; calls for a legal	12:49:56
12	conclusion, vague, and assumes facts, and	12:49:57
13	argumentative.	12:50:00
14	MS. HICKOX: Join.	12:50:01
15	THE WITNESS: I'm employed at a company	12:50:04
16	that my brother owns.	12:50:07
17	BY MR. TREECE:	12:50:13
18	Q Are you married?	12:50:13
19	A Yes.	12:50:16
20	Q What is your husband's name?	12:50:17
21	A Brian.	12:50:21
22	Q Brian Dembrowski?	12:50:25

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

21

1	A Uh-huh, yes.	12:50:27
2	Q And have you had a relationship with	12:50:30
3	Keenan Wyatt?	12:50:33
4	MS. VASQUEZ: Objection; relevance,	12:50:35
5	privacy --	12:50:37
6	MS. HICKOX: Same objections. And also --	12:50:39
7	MS. VASQUEZ: -- and --	12:50:41
8	MS. HICKOX: Sorry. Didn't mean to cut	12:50:41
9	you off.	12:50:43
10	MS. VASQUEZ: I'm sorry. I'm sorry,	12:50:44
11	Ms. Hickox.	12:50:45
12	-- vague.	12:50:46
13	MS. HICKOX: Same objections; privacy.	12:50:46
14	I'm going to instruct her not to answer.	12:50:49
15	MR. TREECE: All right. We'll address	12:50:51
16	that as we move along. I think that's relevant	12:50:52
17	and the witness needs to answer that question.	12:50:55
18	So -- but we'll cross that bridge when we get to	12:50:58
19	it.	12:51:01
20	BY MR. TREECE:	12:51:02
21	Q Ms. Dembrowski, what is your educational	12:51:03
22	background?	12:51:08

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

22

1 A High school. 12:51:08

2 Q Do you have any formal education in 12:51:10

3 production? 12:51:14

4 A As in college or school, no. 12:51:17

5 Q And what is your role at Infinitum Nihil? 12:51:21

6 What's your official title? 12:51:24

7 A President. 12:51:26

8 Q And what are your duties as president? 12:51:28

9 A It's oversee -- you know, with others 12:51:32

10 oversee projects, ideas, development, then going 12:51:42

11 into production. 12:51:49

12 Q And what type of projects have you worked 12:51:51

13 on so I can get an understanding for what you're 12:51:53

14 talking about when you say projects? 12:51:57

15 MS. VASQUEZ: Objection; vague. 12:51:59

16 THE WITNESS: I've worked on many projects 12:52:07

17 over the many number of years, whether it's a -- 12:52:09

18 you know, developing a -- a book into, you know, a 12:52:13

19 script for a film. There's many. 12:52:15

20 BY MR. TREECE: 12:52:21

21 Q Are all of those projects projects that 12:52:21

22 involve your brother, Mr. Depp, in a talent 12:52:23

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

23

1	capacity; that is, as an actor, performer,	12:52:28
2	something along those lines?	12:52:31
3	MS. VASQUEZ: Objection; assumes facts,	12:52:32
4	vague, compound.	12:52:36
5	MS. HICKOX: Join.	12:52:38
6	THE WITNESS: Not necessarily, no. They	12:52:45
7	were projects that -- you know, they were	12:52:47
8	developed. If there was something in it -- a role	12:52:49
9	in it for him that -- that he liked that worked,	12:52:50
10	then that was fine. But otherwise it was for, you	12:52:54
11	know, other talent as well, not --	12:52:58
12	BY MR. TREECE:	12:53:01
13	Q Okay.	12:53:01
14	A -- specifically for him.	12:53:01
15	Q Okay, thank you.	12:53:01
16	What's Infinitum Nihil's relationship with	12:53:02
17	Disney?	12:53:04
18	MS. VASQUEZ: Objection; assumes facts.	12:53:06
19	MS. HICKOX: Join.	12:53:08
20	MS. VASQUEZ: Vague.	12:53:10
21	BY MR. TREECE:	12:53:12
22	Q Well, let me ask you this: Does Infinitum	12:53:12

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

24

1 Nihil have a relationship with Disney? 12:53:14

2 A At the -- at the moment? 12:53:17

3 MS. VASQUEZ: I'm so sorry, 12:53:20

4 Ms. Dembrowski. 12:53:22

5 Objection; vague. 12:53:22

6 THE WITNESS: I don't understand. In what 12:53:28

7 capacity are you asking? 12:53:31

8 BY MR. TREECE: 12:53:33

9 Q Did Infinitum Nihil have a Walt Disney 12:53:40

10 studio deal through May of 2017, do you know? 12:53:42

11 MS. VASQUEZ: Objection; vague, calls for 12:53:45

12 a legal conclusion, lack of foundation, assumes 12:53:46

13 facts. 12:53:49

14 MS. HICKOX: Join. 12:53:49

15 MS. VASQUEZ: And calls for speculation. 12:53:51

16 THE WITNESS: Infinitum had an -- a 12:53:56

17 first-look deal with Disney. 12:54:00

18 BY MR. TREECE: 12:54:04

19 Q And what is the first-look deal you're 12:54:05

20 referring to? 12:54:07

21 A A first-look deal is when you take 12:54:10

22 potential projects to the studio and they have the 12:54:13

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CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

25

1	first opportunity to get involved in the project	12:54:18
2	or we're able to take it elsewhere.	12:54:22
3	Q And on what projects would that refer to?	12:54:25
4	Is that a specific project or a multitude of	12:54:28
5	projects?	12:54:31
6	MS. VASQUEZ: Objection; calls for a legal	12:54:31
7	conclusion, vague, and compound.	12:54:33
8	MS. HICKOX: Join.	12:54:37
9	THE WITNESS: It would -- it would -- it	12:54:41
10	would not be just a specific project. It would be	12:54:42
11	projects that we were interested in developing.	12:54:45
12	BY MR. TREECE:	12:54:50
13	Q Do you recall how long Infinitum, I think	12:54:50
14	is how you pronounce it, Nihil had a first-look	12:54:55
15	deal with Disney?	12:54:59
16	MS. VASQUEZ: Objection; calls for a legal	12:55:04
17	conclusion, vague, calls for speculation.	12:55:06
18	MS. HICKOX: Join.	12:55:10
19	THE WITNESS: I don't recall the exact	12:55:17
20	number of years. I believe it -- I believe it to	12:55:18
21	be maybe -- I don't recall the exact number of	12:55:23
22	years. Maybe around four. I don't know.	12:55:27

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

26

1	BY MR. TREECE:	12:55:34
2	Q All right. Ms. Dembrowski, can you	12:55:34
3	describe to me your relationship with Mr. Depp	12:55:37
4	during the time he was dating Amber Heard?	12:55:43
5	MS. HICKOX: Objection; vague.	12:55:51
6	MS. VASQUEZ: Objection.	12:55:52
7	Join.	12:55:57
8	THE WITNESS: That's a -- that's a very	12:56:01
9	broad question. He's my brother and we work	12:56:04
10	together as well.	12:56:08
11	BY MR. TREECE:	12:56:09
12	Q All right. And how would you describe	12:56:09
13	your relationship? Did you-all get along well?	12:56:11
14	That -- that type of thing is what I'm looking	12:56:14
15	for. So you can describe that for me in whatever	12:56:16
16	way you think accurately summarizes your	12:56:19
17	relationship with your brother, Johnny, at the	12:56:21
18	time he and Amber were dating.	12:56:24
19	MS. VASQUEZ: Objection --	12:56:27
20	MS. HICKOX: Objection; vague. Also calls	12:56:28
21	for a narrative.	12:56:30
22	MS. VASQUEZ: Objection; vague, compound,	12:56:31

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

27

1	frankly unintelligible.	12:56:35
2	THE WITNESS: I think we had a good	12:56:42
3	relationship, you know.	12:56:44
4	BY MR. TREECE:	12:56:46
5	Q Were you aware of any issues that your	12:56:46
6	brother had during the time he was dating	12:56:51
7	Ms. Heard -- strike that. I'll refrain.	12:56:54
8	During the time Johnny was dating	12:56:59
9	Ms. Heard, were you aware that he was using drugs	12:57:02
10	or alcohol?	12:57:05
11	MS. VASQUEZ: Objection; compound, vague,	12:57:07
12	calls for speculation, assumes facts, lack of	12:57:09
13	foundation.	12:57:13
14	MS. HICKOX: Join.	12:57:14
15	THE WITNESS: I -- I -- I understood, yes,	12:57:21
16	that he had been, you know.	12:57:28
17	BY MR. TREECE:	12:57:34
18	Q Did you ever conclude that your brother	12:57:34
19	had an issue with drugs or alcohol?	12:57:37
20	MS. VASQUEZ: Objection; vague as to time,	12:57:41
21	calls for speculation, assumes facts, lack of	12:57:45
22	foundation.	12:57:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

28

1	MS. HICKOX: Join.	12:57:50
2	THE WITNESS: At one point, yes.	12:57:57
3	BY MR. TREECE:	12:58:00
4	Q What point did you conclude that he had	12:58:00
5	problems with drugs or alcohol?	12:58:03
6	MS. VASQUEZ: Same objections.	12:58:05
7	MS. HICKOX: Join.	12:58:08
8	MS. VASQUEZ: Also calls for an expert	12:58:12
9	opinion.	12:58:14
10	THE WITNESS: I don't recall exactly; but	12:58:24
11	what I do recall was there was a -- you know, one	12:58:31
12	prescription medication that he was -- had been	12:58:36
13	taking for quite some time.	12:58:44
14	BY MR. TREECE:	12:58:45
15	Q What prescription medication is that?	12:58:45
16	A I --	12:58:48
17	MS. VASQUEZ: Objection; calls for	12:58:49
18	speculation, calls for a legal conclusion.	12:58:50
19	MS. HICKOX: Join.	12:58:53
20	THE WITNESS: I don't know. I'm sorry. I	12:58:54
21	don't recall the exact.	12:58:56
22	BY MR. TREECE:	12:58:58

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

29

1	Q Did you ever become aware that Mr. Depp	12:58:58
2	was using cocaine?	12:59:02
3	MS. VASQUEZ: Objection; vague as to time,	12:59:05
4	calls for speculation, assumes facts.	12:59:08
5	MS. HICKOX: Join.	12:59:11
6	MS. VASQUEZ: Lack of foundation.	12:59:12
7	THE WITNESS: I had never seen him use	12:59:17
8	cocaine ever, so...	12:59:20
9	BY MR. TREECE:	12:59:24
10	Q What I'm going to do is I'm going to show	12:59:24
11	you an exhibit that's marked as Exhibit 3. We're	12:59:26
12	going to come back to 2 in a moment.	12:59:31
13	(Exhibit 3 was marked for identification	12:59:38
14	and is attached to the transcript.)	12:59:45
15	MS. HICKOX: Counsel, do you have a	12:59:45
16	preference that we either download it or that	12:59:47
17	you -- we view it through the share screen	12:59:50
18	function?	12:59:51
19	MR. TREECE: Downloading it would enable	12:59:52
20	her to review it on her own, I believe. So if	12:59:54
21	that would be preferable, that would be okay by	12:59:56
22	me. I can also show it on the screen.	12:59:58

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

30

1	MS. HICKOX: Okay. Christi, do you see in	13:00:00
2	the notes -- the Chat function, the ability to	13:00:03
3	download the document?	13:00:05
4	THE WITNESS: I see in the Chat --	13:00:09
5	MS. HICKOX: Yeah. If you click on Chat,	13:00:12
6	you should see something called CD Exhibit 3. Do	13:00:13
7	you see that?	13:00:18
8	THE WITNESS: Yes.	13:00:19
9	MS. HICKOX: Okay. And if you click on	13:00:20
10	it, you should be able to download it. That way	13:00:21
11	you can review things natively on your computer.	13:00:24
12	THE WITNESS: Okay.	13:00:26
13	MS. HICKOX: Mr. Treece may want to direct	13:00:27
14	you to certain pages or messages, but just know	13:00:30
15	that you can review the entire document if -- if	13:00:32
16	you would like to do so and would need to do so	13:00:35
17	before responding to any questions.	13:00:37
18	THE WITNESS: Okay. So I just click on	13:00:39
19	download?	13:00:41
20	MS. HICKOX: Yes.	13:00:42
21	BY MR. TREECE:	13:00:45
22	Q And, Ms. Dembrowski, let me know when	13:00:45

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

31

1 you've been able to download and open that. 13:00:46

2 A Okay, I've -- I think I've done it. I 13:01:05

3 think I've downloaded it. 13:01:09

4 Q All right. Thank you. 13:01:10

5 Can you take a moment to review ALH 17940, 13:01:11

6 that's the Bates number in the bottom right, 13:01:17

7 through 17943. 13:01:20

8 A I'm sorry? 13:01:25

9 Q Can you take a moment to review the Bates 13:01:26

10 numbered range 17940 to 17943 and let me know when 13:01:30

11 you've finished. 13:01:36

12 A I'm assuming you're meaning what I just 13:01:43

13 downloaded, review it? 13:01:45

14 Q Correct. If you scroll down on what you 13:01:47

15 just downloaded -- 13:01:49

16 A Uh-huh. 13:01:50

17 Q -- at the bottom right of each page there 13:01:50

18 will be a -- a page number, for -- 13:01:52

19 A Oh. 13:01:53

20 Q -- lack of a better term. We call them 13:01:54

21 Bates numbers, but it's just a page number 13:01:57

22 reference. And it's 17940 to 43. It's the color 13:01:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

32

1	versions of text messages.	13:02:05
2	A Okay.	13:02:07
3	MS. HICKOX: It's just the first four	13:02:08
4	pages.	13:02:10
5	BY MR. TREECE:	13:04:23
6	Q I'm going to walk through this. I don't	13:04:23
7	know if it helps you. I want you to get a -- you	13:04:25
8	know, an understanding of what's in here, but	13:04:27
9	we'll go through generally.	13:04:28
10	My question for you first is, do you	13:04:30
11	recall this text chain? Do you recall this text	13:04:33
12	chain?	13:04:42
13	MS. HICKOX: One second.	13:04:46
14	Camille, I see that you are still muted,	13:04:48
15	but I saw that you may be trying to say something.	13:04:50
16	MS. VASQUEZ: Thanks.	13:04:53
17	Objection; vague and compound.	13:04:54
18	MS. HICKOX: Join.	13:04:59
19	THE WITNESS: Can I -- can I finish	13:05:03
20	reading it?	13:05:05
21	MS. HICKOX: Yes.	13:05:06
22	BY MR. TREECE:	13:05:07

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

33

1 Q Certainly. 13:05:07
2 A I don't -- I'm sorry. I read it. 13:05:37
3 Q Do you recall this text chain? 13:05:40
4 A I don't know that I specifically recall. 13:05:42
5 Q All right. Well, we'll -- we'll walk 13:05:48
6 through this and see if I can refresh your 13:05:50
7 recollection. 13:05:52
R; IR 8 Is this a -- a text chain between you and 13:05:52
9 Amber Heard on March 22nd, 2013? 13:05:56
10 A Yes. 13:06:01
11 MS. VASQUEZ: Objection -- 13:06:01
12 THE WITNESS: Sorry. 13:06:02
13 MS. VASQUEZ: Objection; vague, ambiguous, 13:06:04
14 calls for a legal conclusion, lack of foundation, 13:06:06
15 assumes facts. 13:06:08
16 MS. HICKOX: Join. 13:06:11
17 BY MR. TREECE: 13:06:12
18 Q And the -- the first text in the chain, do 13:06:12
19 you see the text from Amber Heard that says, I'm 13:06:15
20 sorry, I don't know what to do? 13:06:18
21 MS. VASQUEZ: Same objections. 13:06:20
22 THE WITNESS: Yes. 13:06:21

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

34

1	BY MR. TREECE:	13:06:22
2	Q And then you respond with two texts there,	13:06:22
3	the seconds of which says, It's sad and I'm sorry	13:06:27
4	you guys are going through this. Do you see that?	13:06:31
5	A Yes.	13:06:35
6	Q Do you recall what that refers to?	13:06:36
7	MS. VASQUEZ: Objection; calls for	13:06:40
8	speculation.	13:06:41
9	THE WITNESS: No.	13:06:47
10	BY MR. TREECE:	13:06:48
11	Q All right. Are you aware that Keith	13:06:48
12	Richards was -- there was a Keith Richards	13:06:51
13	documentary on or around this March 2013 time	13:06:55
14	frame?	13:07:00
15	MS. VASQUEZ: Objection; assumes facts,	13:07:01
16	lack of foundation.	13:07:03
17	MS. HICKOX: Join.	13:07:05
18	THE WITNESS: I'm aware of the Keith	13:07:08
19	Richards documentary.	13:07:09
20	BY MR. TREECE:	13:07:11
21	Q Are you aware of any issues that arose in	13:07:11
22	connection with the Keith Richards documentary	13:07:13

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

35

1 that you and Amber discussed? 13:07:16

2 MS. VASQUEZ: Objection; assumes facts, 13:07:19

3 vague, ambiguous, compound, calls for speculation. 13:07:22

4 MS. HICKOX: Join. 13:07:30

5 THE WITNESS: I'm sorry. Could you ask 13:07:34

6 again? 13:07:36

7 BY MR. TREECE: 13:07:37

8 Q Yeah. Why don't we do this. 13:07:37

R; VA; 9 All right. If you'll take a look at the 13:07:38

H; SP; 10 second blue box on 17940, do you see where Amber 13:07:41

AF; 11 says, I don't know what you could do. He's upset 13:07:44

FSPK 12 and there's nothing I can do to reason with him. 13:07:48

13 He's another person when he's like this. He's 13:07:50

14 fueled up on booze and coke. Do you see that? 13:07:52

15 A Yes. 13:07:57

16 Q Do you remember Ms. Heard talking to you 13:07:58

17 about Mr. Depp being another person when he's 13:08:00

18 fueled up on booze and coke? 13:08:05

19 MS. VASQUEZ: Objection; vague, calls for 13:08:07

20 hearsay, calls for speculation, compound, assumes 13:08:09

21 facts. 13:08:13

22 MS. HICKOX: Join. 13:08:14

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

36

R; VA; H; SP; AF; FSPK	1	THE WITNESS: I remember her saying these	13:08:20
	2	things, yes.	13:08:21
	3	BY MR. TREECE:	13:08:23
	4	Q And did you talk to her about -- about	13:08:23
	5	those things?	13:08:27
	6	MS. VASQUEZ: Objection; vague, compound,	13:08:28
	7	calls for hearsay.	13:08:30
	8	MS. HICKOX: Join. Vague as to "those	13:08:31
	9	things."	13:08:34
	10	THE WITNESS: We spoke occasionally when	13:08:41
	11	she would bring it up, yes.	13:08:42
	12	BY MR. TREECE:	13:08:45
	13	Q Were you aware that Johnny and Amber would	13:08:45
	14	get into, you know, fights, arguments, and then	13:08:50
	15	Amber might reach out to you to try to address	13:08:56
	16	those with her brother -- with your brother,	13:08:59
	17	excuse me?	13:09:01
O	18	MS. VASQUEZ: Objection; compound, vague,	13:09:02
	19	ambiguous, lack of foundation, assumes facts,	13:09:05
	20	calls for speculation, calls for hearsay.	13:09:08
	21	MS. HICKOX: Join.	13:09:12
	22	THE WITNESS: I don't know that -- I mean,	13:09:22

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

37

1	it was -- it always seemed a little dramatic, you	13:09:31
2	know what I mean, so -- with Amber. So, you know,	13:09:35
3	I don't -- I don't know how often she reached out	13:09:41
4	or whatever, you know, during that time.	13:09:44
5	BY MR. TREECE:	13:09:48
6	Q All right. Well, let's -- let's get back	13:09:48
7	to the text chain then. She goes on to say, And	13:09:50
8	he believes we are fighting. No one is fighting	13:09:54
9	him. He's just gone. And this is the fourth time	13:09:57
10	this week. Do you see that?	13:09:58
11	A Yes.	13:10:01
12	Q And she's referring to the fourth time	13:10:02
13	this week that he's been fueled up on booze and	13:10:04
14	coke, correct?	13:10:07
15	MS. VASQUEZ: Objection --	13:10:08
16	MS. HICKOX: Objection.	13:10:09
17	MS. VASQUEZ: -- calls for spec -- yeah,	13:10:10
18	calls for speculation, assumes facts, calls for	13:10:11
19	hearsay, lack of foundation.	13:10:15
20	MS. HICKOX: Join.	13:10:17
21	THE WITNESS: I don't know what she's	13:10:23
22	referring to, to be honest.	13:10:25

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

38

1	BY MR. TREECE:	13:10:26
2	Q At the time you received this text do you	13:10:27
3	recall discussing this issue with her?	13:10:29
4	MS. VASQUEZ: Objection; vague and	13:10:34
5	ambiguous, calls for hearsay, calls for	13:10:35
6	speculation.	13:10:38
7	MS. HICKOX: Join.	13:10:40
8	THE WITNESS: At the time I received this	13:10:53
9	text is what you asked me?	13:10:55
10	BY MR. TREECE:	13:10:58
11	Q Or -- at or around the time you received	13:10:58
12	this text did you talk to Ms. Heard about the	13:11:00
13	issues she outlines in the box that we're	13:11:03
14	reviewing?	13:11:06
15	MS. VASQUEZ: Objection; vague and	13:11:07
16	ambiguous, compound, calls for hearsay, calls for	13:11:08
17	speculation, assumes facts, lack of foundation.	13:11:11
18	MS. HICKOX: Join.	13:11:14
19	THE WITNESS: I don't recall if I talked	13:11:15
20	to her.	13:11:17
21	BY MR. TREECE:	13:11:17
22	Q All right. And I think we'll get to that	13:11:18

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

39

1	as we move along.	13:11:20
2	Ms. Heard goes on to tell you, The only	13:11:22
3	time we have this kind of fight is when that combo	13:11:24
4	is in action. Do you see that?	13:11:28
5	A Yes.	13:11:31
6	Q And she's letting you know that the only	13:11:32
7	time they really fight is when Johnny is consuming	13:11:34
8	drugs or alcohol; is that right?	13:11:40
9	MS. VASQUEZ: Objection; calls for	13:11:42
10	speculation. How is this witness supposed to know	13:11:44
11	what Amber is thinking? Assumes facts, lack of	13:11:47
12	foundation, calls for hearsay.	13:11:51
13	MR. TREECE: You can keep your speaking	13:11:54
14	objections to yourself. You can lodge the	13:11:55
15	specific objections, but please refrain from	13:11:57
16	speaking objections.	13:11:59
17	MS. HICKOX: And I'll join in those	13:12:01
18	objections.	13:12:03
19	THE WITNESS: Okay. I'm sorry. Would you	13:12:05
20	repeat your question again?	13:12:07
21	BY MR. TREECE:	13:12:09
22	Q So Amber is telling you that the only time	13:12:09

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

40

1 they really fight is when Johnny is under the 13:12:12

2 influence of drugs or alcohol, correct? 13:12:16

O 3 MS. VASQUEZ: Objection; calls for 13:12:19

4 speculation, calls for hearsay, and assumes facts, 13:12:19

5 lack of foundation. 13:12:23

6 (Ms. Zellner joined the deposition.) 13:12:24

7 MS. HICKOX: Join. And also want to add 13:12:25

8 it potentially violates best evidence rule. It's, 13:12:28

9 you know, purporting to establish the contents of 13:12:31

10 the documents. 13:12:34

11 BY MR. TREECE: 13:12:36

12 Q You still need to answer. 13:12:36

13 A Yeah, I will. 13:12:37

14 I think personally she liked to use that a 13:12:38

15 lot. She just would say it. 13:12:53

16 Q So she would tell you a lot that the only 13:12:56

17 time that they have fights is when Johnny's under 13:12:58

18 the influence of drugs and alcohol? 13:13:01

O 19 MS. VASQUEZ: Objection; misstates prior 13:13:03

20 testimony, calls for hearsay, calls for 13:13:05

21 speculation, assumes facts, lack of foundation. 13:13:08

22 MS. HICKOX: Join. 13:13:13

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

41

1 THE WITNESS: It's not that she would tell 13:13:18
2 me a lot. It was -- it was -- it felt like 13:13:20
3 that's, you know -- was basically, you know, her 13:13:29
4 reasoning; but it wasn't necessarily so. 13:13:33
5 BY MR. TREECE: 13:13:37
6 Q And do you have any personal knowledge to 13:13:37
7 rebut her assertion that the only time we have -- 13:13:41
8 kind of fight is when that combo is in action, 13:13:45
9 referring to drugs and alcohol? 13:13:48
O 10 MS. VASQUEZ: Objection; argumentative, 13:13:49
11 calls for speculation, assumes facts, compound, 13:13:53
12 calls for hearsay. 13:13:59
13 MS. HICKOX: Join. 13:14:01
14 THE WITNESS: Well, you reference that 13:14:06
15 kind of fight, so I don't know what that means. 13:14:08
16 But, excuse me, I do know that, you know, there 13:14:11
17 were, you know, disagreements that had nothing to 13:14:17
18 do with that, so... 13:14:20
19 BY MR. TREECE: 13:14:24
20 Q And what were those? 13:14:25
O 21 MS. VASQUEZ: Objection; vague, ambiguous. 13:14:27
22 MS. HICKOX: Join. 13:14:30

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

42

O 1 MS. VASQUEZ: Calls for hearsay. 13:14:31

2 THE WITNESS: I don't recall all of those. 13:14:34

3 BY MR. TREECE: 13:14:37

R; H; 4 Q All right. And then she goes on to say, 13:14:38
IR

5 He finds something to jump on and then uses it -- 13:14:44

6 uses it as an excuse to dose himself up, which is 13:14:48

7 where he is now, wasted. Do you see that? 13:14:51

8 A Yes. 13:14:56

9 Q And then she goes on to say, I just want 13:14:59

10 to help. I just want to have him back. Do you 13:15:03

11 see that? 13:15:06

12 A Yes. 13:15:08

13 Q And she conveyed to you that she was 13:15:09

14 having issues with Johnny during this week where 13:15:12

15 he was on drugs and alcohol and -- and they were 13:15:17

16 having a fight because of his use of drugs and 13:15:23

17 alcohol, correct? 13:15:25

18 MS. VASQUEZ: Objection; misstates the 13:15:26

19 document, calls for hearsay, assumes facts, lack 13:15:31

20 of foundation, violates the best evidence rule. 13:15:34

21 MS. HICKOX: Join. 13:15:40

22 MS. VASQUEZ: It's also compound and vague 13:15:46

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

43

1 and ambiguous. 13:15:48

2 THE WITNESS: Very vague. 13:15:52

3 I don't know that she states to me what 13:15:56

4 their reason for an argument was, so... 13:16:00

5 BY MR. TREECE: 13:16:04

R; H; 6 Q All right. If you'll turn to page 17941, 13:16:04
IR

7 that's the next page, do you see the text from you 13:16:10

8 to Ms. Heard that says, I'm not sure of the volume 13:16:19

9 or when some is likely to wear off? Do you see 13:16:23

10 that? 13:16:27

11 A Yes. 13:16:28

12 Q What does that refer to? 13:16:29

13 MS. VASQUEZ: Objection; calls for 13:16:31

14 speculation, calls for hearsay. 13:16:33

15 MS. HICKOX: Join. 13:16:36

16 THE WITNESS: I'm not exactly sure. The 13:16:45

17 volume of the argument. 13:16:49

18 BY MR. TREECE: 13:16:53

19 Q Does that refer to the coke and alcohol? 13:16:53

20 MS. VASQUEZ: Objection; calls for 13:16:58

21 speculation, asked and answered, vague and 13:16:59

22 ambiguous, calls for hearsay. 13:17:04

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

44

1	MS. HICKOX: And I'm just -- I join in	13:17:06
2	those objections. And I'm just going to remind	13:17:09
3	Ms. Dembrowski to not guess. If you know, you	13:17:10
4	know. If you don't know, you don't know.	13:17:14
5	THE WITNESS: Right. Well, that's --	13:17:16
6	that's what I'm saying. I don't -- I don't know.	13:17:17
7	BY MR. TREECE:	13:17:19
R; AR; 8	Q This is a text that you sent, correct?	13:17:19
AF		
9	A Yeah.	13:17:21
10	Q This is a text that --	13:17:22
11	MS. VASQUEZ: Objection. Mr. Treece, I'm	13:17:24
12	sorry, I need to lodge an objection.	13:17:25
13	Argumentative, assumes facts, calls for legal	13:17:28
14	conclusion.	13:17:31
15	BY MR. TREECE:	13:17:34
16	Q And just so it's clear on the record, this	13:17:34
17	is a sent that you -- that is a text that you sent	13:17:36
18	to Amber, correct?	13:17:39
19	MS. VASQUEZ: Same objections.	13:17:40
20	THE WITNESS: Yes.	13:17:44
21	BY MR. TREECE:	13:17:45
22	Q And this is a text that you sent her in	13:17:45

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

45

1	response to her telling you that Johnny was fueled	13:17:47
2	up on booze and coke, correct?	13:17:50
3	MS. VASQUEZ: Objection; assumes facts,	13:17:52
4	lack of foundation, calls for hearsay, calls for	13:17:54
5	speculation, violates the best evidence rule,	13:17:57
6	document speaks for itself.	13:18:00
7	MS. HICKOX: Join.	13:18:04
8	THE WITNESS: This is a text that actually	13:18:09
9	speaks about their arguing, so...	13:18:12
10	BY MR. TREECE:	13:18:18
11	Q Do you know if this text refers to trying	13:18:18
12	to get Johnny to the Keith Richards documentary	13:18:21
13	set and having difficulties because he's fueled	13:18:25
14	up -- fueled up on coke and booze?	13:18:28
15	MS. VASQUEZ: Objection; compound, assumes	13:18:31
16	facts, calls for speculation, vague and ambiguous,	13:18:33
17	unintelligible, calls for hearsay.	13:18:37
18	THE WITNESS: I don't recall the timing.	13:18:43
19	BY MR. TREECE:	13:18:47
20	Q Do you have any recollection of what this	13:18:47
21	refers to?	13:18:49
22	MS. VASQUEZ: Objection; asked and	13:18:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

46

1 answered. 13:18:52
2 THE WITNESS: I honestly don't recall the 13:18:58
3 timing. 13:19:00
4 BY MR. TREECE: 13:19:11
5 Q And then do you see in this text chain 13:19:12
6 there's a number of texts on the page we were just 13:19:14
7 on at the bottom saying he's slowly getting 13:19:17
8 moving; and then later, about three hours after 13:19:20
9 the first text is sent, it says, We're finally on 13:19:23
10 our way? Do you see that? 13:19:27
11 A Yes. 13:19:31
12 Q And then do you see on 17942 the text from 13:19:32
13 you saying, Was just hoping all calm for you guys? 13:19:41
14 A Yes. 13:19:50
15 Q Do you know what you were referring to 13:19:51
16 there? 13:19:54
17 MS. VASQUEZ: Objection; calls for 13:19:54
18 speculation, assumes facts. 13:19:56
19 MS. HICKOX: Join. 13:19:58
20 THE WITNESS: I believe I was hoping that 13:20:02
21 they -- their argument was over. 13:20:04
22 BY MR. TREECE: 13:20:07

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

47

1	Q And do you know what precipitated that	13:20:08
2	argument?	13:20:10
3	MS. VASQUEZ: Objection; calls for	13:20:11
4	speculation, calls for hearsay.	13:20:12
5	MS. HICKOX: Join.	13:20:14
6	THE WITNESS: No.	13:20:17
7	BY MR. TREECE:	13:20:20
8	Q Do you recall having any discussion with	13:20:20
9	your brother about an argument he had with Amber	13:20:23
10	on or around March 22nd, 2013?	13:20:27
11	MS. VASQUEZ: Objection; calls for	13:20:31
12	hearsay, vague and ambiguous.	13:20:33
13	MS. HICKOX: Join.	13:20:35
14	MS. VASQUEZ: Assumes facts.	13:20:36
15	THE WITNESS: I don't recall.	13:20:39
16	BY MR. TREECE:	13:20:43
17	Q If you'll turn to 17943.	13:20:43
18	Let me ask you this before we focus on	13:20:57
19	17943. Before March 22nd, 2013 do you recall	13:20:59
20	having any discussions with your brother about his	13:21:05
21	need to get sober?	13:21:08
22	MS. VASQUEZ: Objection; assumes facts,	13:21:11

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

48

1	lack of foundation, calls for hearsay.	13:21:13
2	THE WITNESS: I don't recall.	13:21:18
3	BY MR. TREECE:	13:21:23
4	Q And if you take a look at 17943, do you	13:21:23
5	see at the top where it says, We can get back to	13:21:27
6	the good moments together?	13:21:29
7	A Yes.	13:21:32
8	Q Do you know if that refers to you and	13:21:33
9	Amber working to help Johnny get sober?	13:21:35
10	MS. VASQUEZ: Objection; calls for	13:21:38
11	speculation, assumes facts, lack of foundation.	13:21:40
12	MS. HICKOX: Join.	13:21:43
13	THE WITNESS: I don't recall.	13:21:44
14	BY MR. TREECE:	13:21:54
15	Q Do you recall having any discussions prior	13:21:55
16	to March 22nd, 2013 with Ms. Heard about Amber and	13:21:56
17	Johnny fighting?	13:22:04
18	MS. VASQUEZ: Objection; assumes facts,	13:22:06
19	lack of foundation, calls for hearsay, vague and	13:22:10
20	ambiguous.	13:22:13
21	MS. HICKOX: Join.	13:22:19
22	THE WITNESS: Do I recall conversations	13:22:22

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

49

1	with her about them fighting?	13:22:24
2	BY MR. TREECE:	13:22:27
3	Q Correct, before March 22nd, 2013.	13:22:27
4	A I -- I don't recall.	13:22:32
5	Q Do you recall any discussions with your	13:22:34
6	brother, Johnny, prior to March 22nd, 2013 about	13:22:36
7	Amber and Johnny fighting?	13:22:42
8	MS. VASQUEZ: Objection; asked and	13:22:45
9	answered, assumes facts, lack of foundation, calls	13:22:47
10	for hearsay, vague.	13:22:50
11	MS. HICKOX: Join.	13:22:52
12	THE WITNESS: I don't recall.	13:22:55
13	MS. HICKOX: Mr. Treece, I don't mean to	13:22:58
14	interrupt your flow or anything, but I'd like to	13:22:59
15	get a break sometime that's convenient for you.	13:23:02
16	MR. TREECE: Okay.	13:23:05
17	BY MR. TREECE:	13:23:12
18	Q Do you ever recall having a conversation	13:23:12
19	with your brother, Johnny, about fights he was	13:23:14
20	having with Amber Heard?	13:23:17
21	MS. VASQUEZ: Objection; vague and	13:23:19
22	ambiguous, assumes facts, lack of foundation,	13:23:21

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

50

1	calls for hearsay, asked and answered.	13:23:23
2	MS. HICKOX: Join.	13:23:26
3	THE WITNESS: Ever over the course of	13:23:31
4	their time together?	13:23:33
5	BY MR. TREECE:	13:23:35
6	Q Correct.	13:23:35
7	A We occasionally had conversations about	13:23:44
8	arguments, you know --	13:23:49
9	Q What's the --	13:23:53
10	A -- drama.	13:23:54
11	Q What's the first such conversation that	13:23:55
12	you can recall? In other words, you referenced	13:23:57
13	conversations about arguments, and I want to know	13:24:00
14	the first one that you can recall.	13:24:03
15	A I --	13:24:06
16	MS. VASQUEZ: Objection; calls for a	13:24:06
17	narrative, compound, vague and ambiguous, assumes	13:24:07
18	facts.	13:24:11
19	MS. HICKOX: Join.	13:24:11
20	THE WITNESS: I don't recall.	13:24:13
21	BY MR. TREECE:	13:24:16
22	Q Do you recall --	13:24:16

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

51

1	A This --	13:24:17
2	Q I'm sorry. I didn't mean to interrupt	13:24:17
3	you. Go ahead.	13:24:20
4	A No, I don't recall specifics. I don't	13:24:21
5	recall the first one. I don't recall specifics	13:24:23
6	right at the moment.	13:24:25
7	Q Do you recall any discussion with	13:24:26
8	specifics that you had with your brother about any	13:24:29
9	arguments or fights that he and Amber Heard may	13:24:33
10	have been in?	13:24:36
11	MS. VASQUEZ: Objection; calls for	13:24:37
12	speculation, calls for hearsay, assumes facts,	13:24:39
13	lack of foundation.	13:24:41
14	MS. HICKOX: Join. And it's also	13:24:43
15	compound.	13:24:44
16	THE WITNESS: I don't know specifically	13:24:54
17	that I recall -- I mean, we had conversations	13:24:56
18	brother and sister where, you know, I felt it sad,	13:24:59
19	you know, that -- that if -- there seemed to be	13:25:02
20	constant, you know, drama or arguments.	13:25:09
21	BY MR. TREECE:	13:25:14
22	Q And what I'm trying to do is I'm trying to	13:25:15

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

52

1	get your recollection of those conversations you	13:25:17
2	might have had with your brother about those	13:25:19
3	issues he may have had with Amber. And do you --	13:25:22
4	what do you -- and I'm trying to understand from	13:25:27
5	you what specifics you might recall. Can you	13:25:29
6	provide me with any specifics of any conversation	13:25:32
7	that you recall with your brother about arguments	13:25:35
8	that he had with Ms. Heard?	13:25:38
9	MS. VASQUEZ: Objection; compound, calls	13:25:39
10	for a narrative, asked and answered, assumes	13:25:42
11	facts, lack of foundation, calls for hearsay.	13:25:46
12	MS. HICKOX: Join.	13:25:48
13	THE WITNESS: No, I don't -- I don't	13:25:54
14	recall specifics.	13:25:56
15	BY MR. TREECE:	13:26:01
16	Q Same question with respect to Ms. Heard.	13:26:01
17	Do you recall specifics of any conversation you	13:26:03
18	had with Ms. Heard relating to any argument that	13:26:06
19	she may have had with Johnny?	13:26:09
20	MS. VASQUEZ: Same objections.	13:26:12
21	MS. HICKOX: Join.	13:26:14
22	THE WITNESS: I don't recall all specifics	13:26:19

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

53

1	of conversations from a long time ago.	13:26:21
2	BY MR. TREECE:	13:26:25
3	Q Right. And what I'm trying to get from	13:26:25
4	you is I would imagine there are certain events	13:26:27
5	and issues between Amber and Johnny that would	13:26:29
6	stand out in your mind, and I'm trying to	13:26:32
7	understand if you had any discussions with either	13:26:34
8	of them about any of those particular events that	13:26:37
9	might stand out in your mind. Does that help you?	13:26:40
10	A Yeah, I suppose.	13:26:48
11	Q All right. So -- so with that in mind, is	13:26:49
12	there any specific, you know, event or events that	13:26:52
13	you recall being involved with either with	13:26:57
14	discussions with Amber or discussions with Johnny	13:27:00
15	to try to figure out what happened or how you may	13:27:03
16	help?	13:27:05
17	MS. VASQUEZ: Objection; assumes facts,	13:27:07
18	calls for a narrative, compound, calls for	13:27:10
19	hearsay, vague and ambiguous, calls for hearsay.	13:27:15
20	MS. HICKOX: Join.	13:27:21
21	THE WITNESS: Again, you know, I don't	13:27:25
22	really recall specific specifics necessarily, you	13:27:31

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

54

1	know.	13:27:44
2	BY MR. TREECE:	13:27:44
3	Q All right. Well, we'll -- we'll walk	13:27:44
4	through some events as we move along, and maybe	13:27:47
5	that will help you with your recollection.	13:27:49
6	MR. TREECE: All right. And we can go	13:27:53
7	ahead and take a quick break. Let's go off the	13:27:54
8	record.	13:27:57
9	THE VIDEOGRAPHER: Off record, 1:27.	13:27:58
10	(A recess was taken.)	13:28:00
11	THE VIDEOGRAPHER: On record, 1:47.	13:47:47
12	BY MR. TREECE:	13:47:50
13	Q Ms. Dembrowski, I'm going to show you what	13:47:51
14	we'll mark as Exhibit 2.	13:47:54
15	(Exhibit 2 was marked for identification	13:47:57
16	and is attached to the transcript.)	13:47:57
17	BY MR. TREECE:	13:47:57
18	Q And I just loaded that to the Chat, so let	13:48:02
19	me know when you're able to open that.	13:48:04
20	A Okay.	13:48:07
21	Q And this is a small document, it's only	13:48:26
22	two pages, so I can actually just do it on the	13:48:28

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

55

1	screen if you'd prefer.	13:48:30
2	A I have it.	13:48:37
3	Q All right. Ms. Dembrowski, I'll represent	13:48:38
4	to you that this is a payment ledger that was	13:48:39
5	produced by Depp's counsel in this case; and I	13:48:41
6	wanted to look at some of the entries. Do you see	13:48:46
7	at the top right where it says Balance and it says	13:48:48
8	the date of 12-31-15 for the fiscal year?	13:48:52
9	A Yes.	13:48:56
10	Q And I wanted to talk about some of these	13:48:57
11	entries and -- and inquire as to your knowledge as	13:49:01
12	to them. Do you see where it says Danny Depp and	13:49:03
13	Nazee Mahnaz Depp? Do you see that?	13:49:06
14	A Yes.	13:49:14
15	Q Who are they?	13:49:15
16	MS. VASQUEZ: Calls for speculation.	13:49:18
17	BY MR. TREECE:	13:49:21
18	Q Do you know them?	13:49:21
19	A Danny's my brother.	13:49:22
20	Q And who is Nazee?	13:49:25
21	A His wife.	13:49:29
22	Q And are they employed by Infinitum Nihil?	13:49:34

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

56

1	MS. VASQUEZ: Objection; calls for	13:49:41
2	speculation.	13:49:43
3	THE WITNESS: No.	13:49:45
4	BY MR. TREECE:	13:49:47
5	Q Do you see off to the right there's a	13:49:48
6	payment of \$71,000 for 2015? Do you know -- do	13:49:49
7	you have any knowledge with respect to that	13:49:55
8	payment and what it could refer to?	13:49:57
9	MS. VASQUEZ: Objection; assumes facts,	13:50:00
10	calls for speculation, lack of foundation.	13:50:02
11	MS. HICKOX: Join.	13:50:06
12	THE WITNESS: No.	13:50:07
13	BY MR. TREECE:	13:50:12
14	Q All right. If you'll take a look at the	13:50:12
15	second page of this exhibit, do you see the	13:50:14
16	reference to Loan and it has your name there and	13:50:17
17	it's roughly three and a half million dollars? Do	13:50:21
18	you see that?	13:50:32
19	A Yeah, I see that.	13:50:32
20	Q Do you know what that refers to?	13:50:34
21	MS. VASQUEZ: Objection; calls for	13:50:36
22	speculation, calls for a legal conclusion, assumes	13:50:37

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

57

1	facts, lack of foundation.	13:50:39
2	MS. HICKOX: Join.	13:50:41
3	THE WITNESS: I know it -- it refers to a	13:50:50
4	ledger is all I know.	13:50:52
5	BY MR. TREECE:	13:50:54
6	Q Did -- did you ever get a loan from your	13:50:55
7	brother or any of his companies?	13:50:57
8	MS. VASQUEZ: Objection; vague and	13:51:02
9	ambiguous, assumes facts, lack of foundation.	13:51:04
10	MS. HICKOX: Join.	13:51:09
11	MS. VASQUEZ: Relevance.	13:51:10
12	THE WITNESS: No, I never asked for a loan	13:51:12
13	from my brother.	13:51:14
14	BY MR. TREECE:	13:51:15
15	Q And that's a little bit different than the	13:51:15
16	question I asked.	13:51:17
17	A Oh, I'm sorry.	13:51:18
18	Q I'm not asking if you asked for a loan.	13:51:19
19	Did you ever get a loan from your brother or any	13:51:21
20	of his companies?	13:51:23
21	MS. VASQUEZ: Objection; calls for a legal	13:51:24
22	conclusion, assumes facts, lack of foundation,	13:51:26

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

58

1	vague and ambiguous.	13:51:32
2	MS. HICKOX: Join.	13:51:34
3	THE WITNESS: No.	13:51:35
4	BY MR. TREECE:	13:51:37
5	Q So is it fair to say you don't know what	13:51:37
6	this entry refers to?	13:51:39
7	MS. VASQUEZ: Objection; asked and	13:51:41
8	answered.	13:51:42
9	THE WITNESS: No.	13:51:49
10	BY MR. TREECE:	13:51:51
11	Q All right. And then if you'll take a look	13:51:51
12	down below, do you see there's a loan, it's got	13:51:54
13	Infinitum and then there's another loan Infinitum	13:51:57
14	Nihil Records and then another Infinitum Nihil	13:52:03
15	loan, and I'm scrolling and putting the hand over	13:52:06
16	the references I'm referring to, Infinitum Nihil	13:52:10
17	Music, LLC loan, Infinitum Nihil Media, LLC loan?	13:52:14
18	Are you familiar with any of the loans with	13:52:18
19	respect to Infinitum or any subsidiary that are	13:52:20
20	referenced in this document?	13:52:26
21	MS. VASQUEZ: Objection; assumes facts,	13:52:27
22	lack of foundation, violates the best evidence	13:52:30

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

59

1	rule, calls for speculation, and compound, vague	13:52:34
2	and ambiguous.	13:52:37
3	MS. HICKOX: Join.	13:52:39
4	THE WITNESS: No, I'm not familiar with	13:52:43
5	them specifically, no.	13:52:45
6	BY MR. TREECE:	13:52:49
7	Q How much are you paid in your position at	13:52:49
8	Infinitum -- Infinitum Nihil?	13:52:54
9	MS. VASQUEZ: Sorry, Mr. Treece. The	13:52:57
10	court in Virginia has already ruled that that is	13:52:59
11	confidential, private, and that it's not relevant.	13:53:02
12	So we're not going to allow Ms. Dembrowski to	13:53:08
13	answer that question.	13:53:11
14	MS. HICKOX: Based on what Ms. Vasquez	13:53:13
15	said, I'll instruct Ms. Dembrowski not to respond.	13:53:16
16	MR. TREECE: And I'll take your word for	13:53:20
17	that, and we'll take that up later if there's any	13:53:21
18	issue with that.	13:53:24
19	BY MR. TREECE:	13:53:25
20	Q All right. Ms. Dembrowski, Johnny's your	13:53:26
21	younger brother, correct?	13:53:31
22	A Yes.	13:53:33

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

60

1 Q And do you feel protective over him? 13:53:34

O 2 MS. VASQUEZ: Objection; vague and 13:53:37

3 ambiguous. 13:53:39

4 MS. HICKOX: Join. 13:53:40

5 MS. VASQUEZ: Argumentative. 13:53:41

6 THE WITNESS: I think as a human being I 13:53:46

7 feel protective over all my family, my children, 13:53:48

8 my siblings, my -- all my family. 13:53:52

9 BY MR. TREECE: 13:53:55

10 Q And that would include, obviously, your 13:53:56

11 brother, Johnny, correct? 13:53:58

O 12 MS. VASQUEZ: Objection; asked and 13:53:59

13 answered, argumentative. 13:54:00

14 THE WITNESS: Yes. 13:54:04

15 BY MR. TREECE: 13:54:06

16 Q Is -- are those protective feelings 13:54:06

17 affecting your ability to recall events or testify 13:54:09

18 fully and truthfully today? 13:54:14

O 19 MS. VASQUEZ: Objection; argumentative, 13:54:16

20 harassing, vague and ambiguous, misstates her 13:54:18

21 prior testimony. 13:54:28

22 BY MR. TREECE: 13:54:28

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

61

1 Q You can answer, Ms. Dembrowski. 13:54:29
2 A No. 13:54:31
3 Q All right. I'm going to show you what is 13:54:33
4 marked as Exhibit 4. 13:54:38
5 (Exhibit 4 was marked for identification 13:54:40
6 and is attached to the transcript.) 13:55:03
7 BY MR. TREECE: 13:55:03
8 Q And I'm going to share the screen. 13:55:03
9 MS. HICKOX: And, Christi, I recommend 13:55:22
10 downloading the native .pdf on the Chat function 13:55:25
11 and just reviewing the -- the entire thread. 13:55:28
12 THE WITNESS: Okay. I don't see it on the 13:55:32
13 Chat. 13:55:33
14 Okay, there it is. Exhibit 4? 13:55:34
15 BY MR. TREECE: 13:55:36
16 Q Correct. 13:55:36
17 And I'm going to walk you through 13:58:23
18 Exhibit 4. If you'll take a look at the first 13:58:26
19 text message at the top, is this a text message 13:58:29
20 between you and Amber Heard on or around 13:58:33
21 March 3rd, 2014? 13:58:36
22 MS. VASQUEZ: Objection; calls for a legal 13:58:38

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

62

1	conclusion, assumes facts, lack of foundation.	13:58:42
2	THE WITNESS: I'm sorry. I'm still	13:58:45
3	reading it.	13:58:47
4	BY MR. TREECE:	13:58:47
5	Q And I'm starting at the beginning, so I'm	13:58:47
6	asking if this first -- and you can read as we get	13:58:50
7	through. I'm asking if this first text is a text	13:58:53
8	between you and -- and Amber Heard on March 3rd,	13:58:56
9	2014.	13:59:01
10	MS. VASQUEZ: Sorry, Mr. Treece, but the	13:59:01
11	witness is entitled to read the entire document,	13:59:04
12	just like your client did at length during her	13:59:06
13	deposition.	13:59:10
14	So, Ms. Dembrowski, feel free to read the	13:59:10
15	entire document before you answer Mr. Treece's	13:59:13
16	questions.	13:59:16
17	THE WITNESS: Thank you.	13:59:17
18	BY MR. TREECE:	13:59:18
19	Q And I'm not -- and, Ms. Dembrowski, just	13:59:18
20	so you know, I'm not trying to preclude you from	13:59:20
21	reviewing it. I'm actually going to review the	13:59:23
22	whole thing with you. I'm trying to, you know,	13:59:25

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

63

1	efficiently review this. And I understand	13:59:28
2	they're, you know, probably trying to -- strike	13:59:31
3	that.	13:59:33
4	So what I want to ask is, is this first	13:59:33
5	text that you -- a text that you received from	13:59:36
6	Amber on February 3rd, 2014?	13:59:39
7	MS. VASQUEZ: Objection; calls for a legal	13:59:43
8	conclusion, assumes facts, lack of foundation,	13:59:44
9	calls for speculation.	13:59:47
10	THE WITNESS: What I would like to do is	13:59:49
11	continue to read this so that I can --	13:59:51
12	BY MR. TREECE:	13:59:55
13	Q Do you need to read -- well, that's fine.	13:59:56
14	You can read all of it.	13:59:58
15	A Thank you.	13:59:59
16	Okay, I read it.	14:00:42
17	Q All right. Now, the -- the first text	14:00:43
18	that we were looking at, is this a text that you	14:00:46
19	received from Amber on February 3rd, 2014?	14:00:49
20	MS. VASQUEZ: Objection; calls for a legal	14:00:54
21	conclusion, assumes facts, lack of foundation,	14:00:57
22	calls for speculation.	14:01:00

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

64

1	MR. TREECE: Camille, I'll give you a	14:01:05
2	running objection to all of my questions for those	14:01:06
3	objections you just lodged if you would like. I	14:01:08
4	think that would be more efficient.	14:01:10
5	MS. VASQUEZ: I wish it was that simple,	14:01:12
6	Mr. Treece.	14:01:14
7	MR. TREECE: It is that simple. I'll give	14:01:14
8	you -- I'll give you a running objection.	14:01:17
9	MS. VASQUEZ: Well, it depends on your	14:01:19
10	question, but we'll see how it goes.	14:01:20
11	MR. TREECE: I'll give you a running	14:01:22
12	objection to all of my questions. You can have	14:01:24
13	that -- you can have that running objection to all	14:01:27
14	of my questions.	14:01:29
15	MS. VASQUEZ: It's not going to be that	14:01:30
16	simple, unfortunately. This is potential trial	14:01:32
17	testimony.	14:01:36
18	MR. TREECE: So you're --	14:01:36
19	MS. VASQUEZ: This is potentially trial --	14:01:36
20	Mr. Treece, this is potentially trial testimony.	14:01:37
21	As you know, I have to lodge every objection to	14:01:40
22	your questions as we go. So if we get to a point	14:01:42

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

65

1 where I think a running objection or a set of 14:01:47
2 running objections would be helpful, fine. But 14:01:49
3 the way you're phrasing your questions, I have to 14:01:52
4 lodge them. 14:01:55

5 MR. TREECE: We can take that up later if 14:01:58
6 needed. 14:02:00

7 BY MR. TREECE: 14:02:00

8 Q All right. So do you recall my question? 14:02:00

9 A You want to repeat the question? 14:02:05

R; H; 10 Q Yes. So -- well, this is a text that you 14:02:08
IR 11 received from Amber on February 3rd, 2014, 14:02:11
12 correct? 14:02:14

13 MS. VASQUEZ: Same objections. 14:02:15

R; H; 14 THE WITNESS: Yes. 14:02:17
IR

15 BY MR. TREECE: 14:02:18

R; H; 16 Q And she's telling you that she needs your 14:02:18
IR 17 help, correct? 14:02:20

18 MS. VASQUEZ: Objection; calls for 14:02:23
19 hearsay. 14:02:24

R; H; 20 THE WITNESS: Yes. 14:02:27
IR

21 BY MR. TREECE: 14:02:29

R; H; 22 Q And she lets you know that -- that Johnny 14:02:29
IR

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

66

R; H; IR	1	is on a bender with Marilyn Manson; isn't that	14:02:33
	2	right?	14:02:36
	3	MS. VASQUEZ: Objection; calls for	14:02:36
	4	hearsay.	14:02:37
R; H; IR	5	THE WITNESS: That is what she says.	14:02:41
	6	BY MR. TREECE:	14:02:43
	7	Q Right. And she says, Once again believes	14:02:43
	8	it's about me or us fighting, even though that's	14:02:46
	9	what we were fighting. I don't know what to do.	14:02:49
	10	Do you see that?	14:02:51
	11	A Yes.	14:02:53
	12	Q And so she's reaching out to you so that	14:02:54
	13	you can intervene potentially in some way to help,	14:02:57
	14	correct?	14:03:01
	15	MS. VASQUEZ: Objection; calls for	14:03:01
	16	speculation.	14:03:02
	17	MS. HICKOX: Join. Lacks foundation.	14:03:05
	18	THE WITNESS: She's reaching out to me	14:03:10
	19	to -- to talk about it. It appears that she says	14:03:12
	20	can you help, yes.	14:03:17
	21	BY MR. TREECE:	14:03:18
R; H; IR	22	Q Right. And then she tells you she loves	14:03:18

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

67

R; H; 1 him so much but he's going to hurt himself and 14:03:20
IR;
MS; 2 take Amber and Johnny as a couple down; isn't that 14:03:23
AR; AF
3 right? 14:03:26

4 MS. VASQUEZ: Objection; calls for 14:03:27
5 hearsay, misstates the document. 14:03:29

6 MS. HICKOX: Join. 14:03:34

R; H, THE WITNESS: That's what she writes. 14:03:39
IR, 7
MS,

AR, AF 8 BY MR. TREECE: 14:03:40

R; H, 9 Q And then she says, I can't do anything to 14:03:41
IR, MS, 10 avoid how crazy he gets when he's like this. I 14:03:43
AR, AF 11 think he's at Marilyn's show continuing the rage 14:03:47
12 and coke booze binge. Do you see that? 14:03:51

13 MS. VASQUEZ: Objection; misstates the 14:03:53
14 state -- the text message, calls for hearsay. 14:03:55

15 MS. HICKOX: Join. 14:03:59

R; H, 16 THE WITNESS: Yes. 14:04:02
IR,

MS, 17 BY MR. TREECE: 14:04:03
AR, AF

18 Q And I realize I may have said show instead 14:04:03
19 of now. 14:04:05

R; H, 20 So I think he's at Marilyn's now 14:04:06
IR, MS, 21 continuing the rage and coke booze binge. Do you 14:04:08
AR, AF 22 see that? 14:04:11

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

68

1	MS. VASQUEZ: Objection; asked and	14:04:12
2	answered.	14:04:13
R; H, IR, MS, AR, AF; AA	3 THE WITNESS: Yes.	14:04:15
4	BY MR. TREECE:	14:04:16
5	Q And so this is the -- at least the second	14:04:17
6	time we've seen in this deposition where Amber	14:04:19
7	reaches out to you and lets you know that -- that	14:04:21
8	Johnny is in a -- a coke and alcohol-infused rage;	14:04:25
9	is that right?	14:04:34
10	MS. VASQUEZ: Objection; calls for	14:04:35
11	hearsay, assumes facts, calls for speculation,	14:04:37
12	lack of foundation, calls for hearsay.	14:04:40
13	MS. HICKOX: And potentially violates the	14:04:43
14	best evidence rule to the extent that we're	14:04:45
15	looking at excerpts of text messages entire --	14:04:46
16	instead of the entire chain.	14:04:49
17	THE WITNESS: She -- she states that he's	14:04:54
18	in a binge, yes.	14:04:57
19	BY MR. TREECE:	14:05:00
20	Q And the prior exhibit she also reached out	14:05:00
21	to you because he was on a binge, correct?	14:05:03
22	MS. VASQUEZ: Objection; calls for	14:05:06

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

69

1	speculation, calls for hearsay.	14:05:07
2	MS. HICKOX: Join.	14:05:10
IU; R; 3	MS. VASQUEZ: And misstates the prior	14:05:11
H; IR; 3		
MS; AR; 4	testimony and document.	14:05:13
SP; VA; 4		
AF 5	THE WITNESS: In the --	14:05:20
6	BY MR. TREECE:	14:05:21
7	Q Do you --	14:05:21
8	A In the prior text?	14:05:22
9	Q Correct. So this is the second time that	14:05:25
10	Amber has reached out to you with respect to these	14:05:26
11	issues, correct?	14:05:28
12	MS. VASQUEZ: Objection; vague and	14:05:29
13	ambiguous, calls for hearsay, calls for	14:05:31
14	speculation, assumes facts.	14:05:33
15	MR. TREECE: You can have a running	14:05:37
IU; R; 16	objection.	14:05:38
H; IR; 16		
MS; AR; 17	THE WITNESS: Yes.	14:05:43
SP; VA; 17		
AF 18	BY MR. TREECE:	14:05:45
19	Q And again she says, Can you help. Do you	14:05:45
20	see that?	14:05:48
21	MS. VASQUEZ: Objection; vague and	14:05:48
22	ambiguous.	14:05:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

70

1	THE WITNESS: Yes.	14:05:53
2	BY MR. TREECE:	14:05:55
3	Q And she says, He needs to come home. We	14:05:56
4	have no reason to fight. He just aims all his	14:05:58
5	anger at me when he's on it. Do you see that?	14:06:01
6	A Yes.	14:06:06
7	Q And you understood Amber to be telling you	14:06:07
8	that when he's on coke and booze, he aims all of	14:06:10
9	his anger at Amber; isn't that what she conveyed	14:06:13
10	to you?	14:06:17
11	MS. VASQUEZ: Objection; calls for	14:06:17
12	speculation, misstates the prior testimony,	14:06:19
13	assumes facts, lack of foundation, calls for	14:06:21
14	hearsay.	14:06:23
15	MS. HICKOX: Join.	14:06:24
16	THE WITNESS: It is -- it is what she	14:06:36
17	appears to say, yes.	14:06:44
18	BY MR. TREECE:	14:06:47
19	Q And then she says, Don't know what to do.	14:06:47
20	If I leave, I'm not sure we'll be able to come	14:06:50
21	from it. And I don't want to leave him when he's	14:06:53
22	like this, in that state. Then he just has the	14:06:56

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

71

1	echoes of his own mind bouncing around in his	14:06:59
2	head. It's terrible. Do you see that?	14:07:02
3	A Yes.	14:07:05
4	Q And did you understand that Ms. Heard was	14:07:06
5	conveying to you that Johnny doesn't have a full	14:07:11
6	grasp of reality when he's on a alcohol and coke	14:07:15
7	binge?	14:07:19
8	MS. VASQUEZ: Objection; misstates the	14:07:20
9	document, calls for hearsay, calls for	14:07:23
10	speculation, assumes facts, lack of foundation,	14:07:26
11	violates the best evidence rule.	14:07:28
12	MR. TREECE: Running Objection, you can	14:07:31
13	have it.	14:07:33
14	MS. HICKOX: Join.	14:07:33
15	THE WITNESS: I can't assume exactly what	14:07:36
16	she's saying in that manner that you're trying	14:07:38
17	to --	14:07:43
18	BY MR. TREECE:	14:07:43
19	Q What did you -- okay, sorry.	14:07:43
20	What did you understand her to mean when	14:07:45
21	she says he's got echoes of his own mind bouncing	14:07:47
22	around in his head?	14:07:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022.

72

1	MS. VASQUEZ: Objection; calls for	14:07:51
2	speculation, vague and ambiguous.	14:07:53
3	MS. HICKOX: Join.	14:07:55
4	THE WITNESS: I don't really understand	14:08:01
5	her -- for it to be anything specific other than	14:08:04
6	just her description.	14:08:07
7	BY MR. TREECE:	14:08:08
8	Q Were you ever around Johnny when he was on	14:08:08
9	an alcohol and coke binge?	14:08:11
10	MS. VASQUEZ: Objection; calls for	14:08:15
11	speculation, assumes facts, lack of foundation.	14:08:17
12	MS. HICKOX: Join.	14:08:23
13	THE WITNESS: I don't -- I don't recall	14:08:25
14	being around him.	14:08:27
15	BY MR. TREECE:	14:08:29
16	Q Did you ever talk to him when he was on an	14:08:29
17	alcohol and coke binge?	14:08:32
18	MS. VASQUEZ: Same objections.	14:08:35
19	MS. HICKOX: Join.	14:08:36
20	THE WITNESS: Again, I don't recall him	14:08:39
21	being on a binge.	14:08:41
22	BY MR. TREECE:	14:08:44

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

73

1	Q All right. So you respond to Amber's text	14:08:45
2	above and you say, Where are the kids. Do you see	14:08:48
3	that?	14:08:52
4	A Yes.	14:08:52
5	Q Why did you ask where the kids are?	14:08:53
6	A I don't recall.	14:09:04
7	Q Is it because she told you that he's on a	14:09:06
8	bender with Manson in a rage and coke booze binge	14:09:10
9	and you want to make sure that the kids are not	14:09:15
10	around him?	14:09:17
11	MS. VASQUEZ: Objection; compound, asked	14:09:18
12	and answered, misstates the prior testimony.	14:09:19
13	MS. HICKOX: Join.	14:09:23
14	THE WITNESS: I don't recall why I asked	14:09:26
15	that question.	14:09:28
16	BY MR. TREECE:	14:09:30
17	Q But it's fair to say that after she	14:09:30
18	conveys to you what we just reviewed your -- your	14:09:32
19	first response to her was concern for the kids; is	14:09:35
20	that right?	14:09:40
21	MS. VASQUEZ: Objection; misstates the	14:09:40
22	prior testimony, asked and answered.	14:09:42

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

74

1	MS. HICKOX: Join.	14:09:45
2	MS. VASQUEZ: The document speaks for	14:09:46
3	itself.	14:09:48
4	THE WITNESS: I don't -- I don't recall it	14:09:51
5	being a concern, like, in that way for the kids.	14:09:53
6	BY MR. TREECE:	14:09:59
7	Q All right. I'd like to focus you now on	14:10:00
8	17945. Do you see the text that you sent to Amber	14:10:05
9	Heard stating, Do you want to come to the office	14:10:14
10	to talk?	14:10:17
11	A Yes.	14:10:22
12	Q And that's because you empathized with her	14:10:23
13	and the difficulties that she was having with --	14:10:26
14	with Johnny and you wanted to talk to her about	14:10:28
15	them to see if you could help, correct?	14:10:31
16	MS. VASQUEZ: Objection; compound,	14:10:33
17	misstates the document, assumes facts.	14:10:34
18	MS. HICKOX: Join.	14:10:38
19	THE WITNESS: I -- I would say that	14:10:45
20	because she was, you know, reaching out I asked if	14:10:47
21	she wanted to talk.	14:10:50
22	BY MR. TREECE:	14:10:54

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

75

1	Q All right. And then do you see below that	14:10:55
2	she tells you, He needs help. He doesn't have it	14:10:57
3	under control. The coke is hard on us, on him.	14:11:01
4	It makes him believe he's mad at me about	14:11:05
5	everything. Do you see that?	14:11:08
6	MS. VASQUEZ: Objection; misstates the	14:11:08
7	prior testimony, violates the best evidence rule.	14:11:10
8	THE WITNESS: I see that.	14:11:14
9	BY MR. TREECE:	14:11:15
10	Q And she conveyed that to you, correct?	14:11:16
11	MS. VASQUEZ: Objection; vague.	14:11:19
12	THE WITNESS: I'm not sure I understand.	14:11:23
13	BY MR. TREECE:	14:11:25
14	Q Well, let me ask you this: Did you agree	14:11:25
15	that -- at the time you had this text chain that	14:11:29
16	Johnny needed help with drugs and alcohol?	14:11:32
17	MS. VASQUEZ: Objection; vague, assumes	14:11:36
18	facts, calls for speculation.	14:11:39
19	MS. HICKOX: Join.	14:11:42
20	THE WITNESS: I don't recall. I'd have to	14:11:48
21	read through it. I don't -- I don't recall it.	14:11:52
22	BY MR. TREECE:	14:11:57

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

76

1	Q Did you have any reason to doubt that what	14:11:57
2	Amber was telling you was true when she sent these	14:11:59
3	text messages?	14:12:03
4	MS. VASQUEZ: Objection; argumentative,	14:12:04
5	compound.	14:12:08
6	THE WITNESS: I just knew she wanted to	14:12:16
7	talk about something, so...	14:12:17
8	BY MR. TREECE:	14:12:21
9	Q I mean, she's -- this is your little	14:12:21
10	brother, right? So she's telling you about he's	14:12:24
11	on a bender with Manson. You're -- you send a	14:12:27
12	text about where are the kids. You offer to talk	14:12:29
13	to her. She tells you he needs help, he doesn't	14:12:31
14	have it under control, he gets mad at her when	14:12:34
15	he's -- when he's on coke, and he gets mad about	14:12:37
16	everything, right?	14:12:42
17	MS. VASQUEZ: Objection; violently	14:12:43
18	misstates the document, assumes facts, calls for	14:12:47
19	hearsay. Counsel, are you testifying? I am so	14:12:49
20	confused by this line of questioning.	14:12:55
21	BY MR. TREECE:	14:12:58
22	Q You -- you can answer, Ms. Dembrowski.	14:12:58

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

77

1	MS. VASQUEZ: If you understand the	14:13:00
2	question.	14:13:01
3	THE WITNESS: I don't understand the	14:13:02
4	question, so...	14:13:03
5	BY MR. TREECE:	14:13:04
6	Q All right. So at this point in time	14:13:04
7	Amber's conveying some serious concerns about	14:13:08
8	the -- the -- the mental state and well-being of	14:13:11
9	your brother, correct?	14:13:15
10	MS. VASQUEZ: Objection; misstates prior	14:13:16
11	testimony, misstates the document, calls for a	14:13:18
12	conclusion, calls for speculation, hearsay.	14:13:21
13	MS. HICKOX: Join.	14:13:25
14	THE WITNESS: She -- she's reaching out	14:13:29
15	about a specific moment.	14:13:32
16	BY MR. TREECE:	14:13:33
17	Q And you were concerned based on what she	14:13:33
18	conveyed to you, correct?	14:13:36
19	MS. VASQUEZ: Objection; asked and	14:13:37
20	answered, vague and ambiguous, calls for hearsay,	14:13:39
21	assumes facts.	14:13:43
22	THE WITNESS: I was -- I was open to being	14:13:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

78

1 able to talk to her. 14:13:52
2 BY MR. TREECE: 14:13:55
3 Q All right. And you responded saying, 14:13:55
4 Worry about everything, I don't love any of it. 14:13:57
5 Do you see that? 14:14:00
6 A Yes. 14:14:02
7 Q What did you mean by that? 14:14:03
8 A I don't know. 14:14:07
9 Q Were you worried at the time you received 14:14:09
10 these text messages? 14:14:11
11 MS. VASQUEZ: Objection; vague. 14:14:13
12 THE WITNESS: Worried about what in 14:14:20
13 particular? 14:14:24
14 BY MR. TREECE: 14:14:25
15 Q Worried about your brother. 14:14:25
16 MS. VASQUEZ: Objection; vague. 14:14:28
17 THE WITNESS: I was worried that -- that, 14:14:52
18 you know -- I was -- I think I was just more 14:14:55
19 worried that there was, like, a constant argument 14:15:08
20 as opposed to normal life, so... 14:15:15
21 BY MR. TREECE: 14:15:19
22 Q Well, they're not together at this point 14:15:19

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

79

1 in time. She's at Marilyn Manson's -- excuse me. 14:15:21
2 He is at Marilyn Manson's on a bender, correct? 14:15:24
3 MS. VASQUEZ: Objection; calls for 14:15:28
4 speculation. 14:15:30
5 MS. HICKOX: Join. And also assumes facts 14:15:32
6 not in evidence. 14:15:35
7 THE WITNESS: Yeah. I think she's 14:15:35
8 assuming that's where he is. That's what the 14:15:38
9 message is. 14:15:41
10 BY MR. TREECE: 14:15:42
11 Q She -- she tells you that's where he is, 14:15:42
12 correct? 14:15:45
13 MS. VASQUEZ: Objection; misstates the 14:15:45
14 document, asked and answered, calls for hearsay. 14:15:47
15 THE WITNESS: She -- she seems to state to 14:15:53
16 me that she assumes he's there. 14:15:56
17 BY MR. TREECE: 14:15:58
18 Q All right. And then you say, I really 14:15:58
19 want to be able to talk to him. Do you see that? 14:16:00
20 A Yes. 14:16:04
21 Q And you're referring to talking to your 14:16:05
22 brother, Johnny, correct? 14:16:08

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

80

1	A Yes.	14:16:10
2	Q Why did you want to talk to him?	14:16:11
3	A I don't -- I don't recall specifically.	14:16:15
4	Q Then Amber responds when you say you want	14:16:19
5	to talk to him that, Yeah, he needs it. Do you	14:16:21
6	see that?	14:16:24
7	A Yes.	14:16:26
8	Q And she's referring to him needing to talk	14:16:27
9	with you, correct?	14:16:30
10	MS. VASQUEZ: Objection; calls for	14:16:31
11	speculation.	14:16:32
12	MS. HICKOX: Join.	14:16:33
13	THE WITNESS: She's referring to we need	14:16:36
14	to talk, it seems to me.	14:16:39
15	BY MR. TREECE:	14:16:40
16	Q And then she says, He's been on a 24-plus	14:16:41
17	binge with Manson, do you see that? And you say,	14:16:45
18	I understand a lot of life things these days.	14:16:49
19	What does that refer to?	14:16:54
20	A I don't recall.	14:16:56
21	Q And then she responds to you, I don't know	14:17:00
22	what to do. I hate that he always aims at me. I	14:17:02

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

81

1	don't want to break up; but he's forcing it, it	14:17:06
2	seems, like he's trying for that. Do you see	14:17:09
3	that?	14:17:11
4	A Yes.	14:17:11
5	Q And Amber conveyed to you that -- that	14:17:17
6	she's concerned about Johnny's welfare, correct?	14:17:20
7	MS. VASQUEZ: Objection; assumes facts,	14:17:23
8	lack of foundation, calls for hearsay, misstates	14:17:25
9	the document.	14:17:28
10	MS. HICKOX: Join.	14:17:30
11	MS. VASQUEZ: Calls for speculation.	14:17:30
12	THE WITNESS: I believe she said earlier	14:17:36
13	in the text.	14:17:38
14	BY MR. TREECE:	14:17:40
15	Q And she conveys to you that she's	14:17:40
16	concerned about their relationship because he's	14:17:42
17	using drugs and alcohol, correct?	14:17:45
18	MS. VASQUEZ: Objection. Objection;	14:17:47
19	compound, assumes facts, lack of foundation, calls	14:17:49
20	for speculation.	14:17:53
21	MS. HICKOX: Join.	14:17:56
22	THE WITNESS: I mean, she was -- she	14:17:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

82

1	states that she's worried about the relationship.	14:18:02
2	BY MR. TREECE:	14:18:05
3	Q Because of his drug and alcohol use,	14:18:05
4	correct?	14:18:07
5	MS. VASQUEZ: Same objections.	14:18:09
6	MS. HICKOX: Join.	14:18:11
7	THE WITNESS: I don't know if it's	14:18:13
8	specifically that, but...	14:18:15
9	BY MR. TREECE:	14:18:20
10	Q Well, we talked about earlier how she's	14:18:20
11	saying that when he's -- when he's on booze and	14:18:23
12	coke he gets crazy when he's like this. So that's	14:18:29
13	the context of this text message, right? He's --	14:18:35
14	he's on a bender with Manson doing alcohol and	14:18:38
15	booze, and that's raised all these issues; isn't	14:18:41
16	that right?	14:18:44
17	MS. VASQUEZ: Objection; vague, compound,	14:18:44
18	assumes facts, lack of foundation, calls for	14:18:47
19	hearsay, violates the best evidence rule, calls	14:18:49
20	for speculation.	14:18:53
21	MS. HICKOX: Join.	14:18:57
22	THE WITNESS: To me it's her assumption	14:19:01

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

83

1	that he is with Manson.	14:19:04
2	BY MR. TREECE:	14:19:07
3	Q All right. And you -- you respond to her	14:19:07
4	and you say, You wouldn't be engaged if he didn't	14:19:10
5	love you. Do you see that?	14:19:13
6	A Yes.	14:19:15
7	Q So you're -- you're trying to console her	14:19:16
8	and reassure her that despite whatever he might be	14:19:19
9	doing he still loves Amber, correct?	14:19:22
10	MS. VASQUEZ: Objection; assumes facts.	14:19:24
11	THE WITNESS: So I don't -- I don't know	14:19:44
12	if console would be the actual word but maybe, you	14:19:45
13	know, calm her.	14:19:50
14	BY MR. TREECE:	14:19:53
15	Q All right. And then if we turn to Bates	14:19:53
16	number 17947, at the top you say, Maybe you and I	14:19:57
17	talking could help somehow. Do you see that?	14:20:03
18	A Yes.	14:20:08
19	Q So -- so you're offering to get involved	14:20:09
20	and -- and talk to Amber to try to help the	14:20:12
21	situation somehow, correct?	14:20:14
22	MS. VASQUEZ: Objection; vague and	14:20:15

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

84

1 ambiguous and misstates the document. 14:20:16

2 THE WITNESS: I'm sorry. Could you repeat 14:20:26

3 your question? 14:20:28

4 BY MR. TREECE: 14:20:30

5 Q Yes. You offer to get involved and talk 14:20:30

6 to Amber to try to help the situation; isn't that 14:20:35

7 right? 14:20:38

8 MS. VASQUEZ: Same objections. 14:20:38

9 THE WITNESS: I think the situation I 14:20:51

10 would try to be helpful with would be for her and 14:20:56

11 I to speak so that we could have conversation. 14:20:59

12 BY MR. TREECE: 14:21:03

IU; R; 13 Q And then she goes on to tell you, He's 14:21:03

H; IR; 14:21:05

MS; 14 literally just blowing lines and drinking and 14:21:05

AR; 15 commiserating with Manson, who's happy to be there 14:21:08

SP; 15:08

VA; AF 16 for his binge. He's literally been nonstop for 14:21:10

16:10

17 24 hours. Do you see that? 14:21:13

17:13

18 A Yes. 14:21:21

18:21

19 Q And that was conveyed to you, correct? 14:21:22

19:22

20 MS. VASQUEZ: Objection; vague, calls for 14:21:26

20:26

21 hearsay. 14:21:28

21:28

IU; R; 22 THE WITNESS: That is what she wrote. 14:21:32

H; IR; 22:32

MS; AR; 14:21:32

SP; VA; 14:21:32

AF 14:21:32

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

85

1	BY MR. TREECE:	14:21:34
2	Q And then she says, He uses us fighting as	14:21:34
3	an excuse for this sort of binge, like with the	14:21:37
4	hotel room in London. Do you see that?	14:21:39
5	A Yes.	14:21:45
6	Q And do you recall Johnny going on a binge	14:21:46
7	in a hotel room in London?	14:21:50
8	MS. VASQUEZ: Objection; assumes facts,	14:21:52
9	calls for speculation.	14:21:54
10	MS. HICKOX: Join.	14:21:55
11	THE WITNESS: I don't recall.	14:21:57
12	BY MR. TREECE:	14:21:59
13	Q Do you recall him passing out in a	14:21:59
14	bathroom after he went on a binge with Paul	14:22:01
15	Bettany and security having to knock in the door?	14:22:05
16	MS. VASQUEZ: Objection; compound, assumes	14:22:08
17	facts, lack of foundation, calls for hearsay,	14:22:11
18	calls for speculation.	14:22:12
19	MS. HICKOX: Join.	14:22:14
20	THE WITNESS: No, I don't recall.	14:22:16
21	BY MR. TREECE:	14:22:20
22	Q She goes on to say, He is just in	14:22:21

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

86

1 another -- excuse me, strike that. 14:22:24

2 But he just is another person when he's on 14:22:26

3 blow. But he's in total denial about it. Makes 14:22:29

4 it impossible for us to really conflict of any 14:22:32

5 kind. He promised me he was done with this in 14:22:35

6 London. He promised. Do you see that? 14:22:40

7 A Yes. 14:22:42

IU; R;
H; IR; 8
MS; AR;
SP; VA; 9

Q And she's telling you that he's another 14:22:42

person when he's using cocaine, correct? 14:22:45

AF

10 MS. VASQUEZ: Objection; calls for 14:22:48

11 speculation, misstates the document. 14:22:49

12 MS. HICKOX: Join. 14:22:53

13 MS. VASQUEZ: Calls for hearsay. 14:22:54

IU; R;
H; IR; 14
MS; AR;
SP; VA; 15

THE WITNESS: She's telling me that's her 14:22:59

interpretation, yes. 14:23:01

AF

16 BY MR. TREECE: 14:23:03

17 Q And did you have any experience with 14:23:03

18 Johnny when he was on cocaine to draw a different 14:23:07

19 conclusion? 14:23:10

20 MS. VASQUEZ: Objection; asked and 14:23:11

21 answered, assumes facts, calls for speculation. 14:23:13

22 MS. HICKOX: Join. And also vague. 14:23:18

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

87

1 THE WITNESS: I don't -- I don't recall 14:23:25
2 having -- I don't recall having spent time with 14:23:26
3 him necessarily when he was on cocaine. 14:23:32
4 BY MR. TREECE: 14:23:37
5 Q All right. And then on page 17948 you 14:23:37
6 say, If you want to talk I am here. Probably 14:23:41
7 better than texting. And then she -- and then 14:23:44
8 Amber says, Yeah, I'd like to talk whenever. And 14:23:47
9 then ultimately she says, I'll call you as soon as 14:23:51
10 I can. Is that okay? You say, Absolutely. The 14:23:54
11 main thing is to make sure he is okay, do you see 14:23:57
12 that, and then the rest will fall into place. Do 14:24:01
13 you see that? 14:24:04
14 A Yes. 14:24:04
15 Q And so you-all had a conversation 14:24:04
16 following this text exchange, did you not? 14:24:07
17 A I don't recall. 14:24:10
18 MS. VASQUEZ: Objection. 14:24:11
19 Ms. Dembrowski, sorry. Assumes facts, 14:24:12
20 calls for speculation. 14:24:14
21 BY MR. TREECE: 14:24:30
22 Q I'm going to show you what is marked as 14:24:31

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

88

1	Exhibit 5.	14:24:33
2	(Exhibit 5 was marked for identification	14:24:34
3	and is attached to the transcript.)	14:24:34
4	THE WITNESS: I have it. I'm going to	14:25:12
5	read it.	14:25:13
6	BY MR. TREECE:	14:25:13
7	Q All right. And at some point I've got a	14:25:13
8	longer document I'm going to show you, and it is	14:25:16
9	not necessary for you to review it in advance. I	14:25:18
10	actually don't think this is either, because we	14:25:21
11	can go through it. Or the other option is to go	14:25:23
12	off the record, allow you to review, and then	14:25:25
13	we'll come back on the record. So those are my	14:25:29
14	two proposals.	14:25:31
15	MR. TREECE: So why don't we go off the	14:25:33
16	record. That will allow you to review this.	14:25:34
17	THE VIDEOGRAPHER: Off record, 2:25.	14:25:36
18	(A recess was taken.)	14:25:39
19	THE VIDEOGRAPHER: On record, 2:32.	14:32:43
20	BY MR. TREECE:	14:32:46
21	Q Ms. Dembrowski, is Exhibit 5 a text	14:32:46
22	exchange between you and Amber Heard on May 25th,	14:32:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

88

1	Exhibit 5.	14:24:33
2	(Exhibit 5 was marked for identification	14:24:34
3	and is attached to the transcript.)	14:24:34
4	THE WITNESS: I have it. I'm going to	14:25:12
5	read it.	14:25:13
6	BY MR. TREECE:	14:25:13
7	Q All right. And at some point I've got a	14:25:13
8	longer document I'm going to show you, and it is	14:25:16
9	not necessary for you to review it in advance. I	14:25:18
10	actually don't think this is either, because we	14:25:21
11	can go through it. Or the other option is to go	14:25:23
12	off the record, allow you to review, and then	14:25:25
13	we'll come back on the record. So those are my	14:25:29
14	two proposals.	14:25:31
15	MR. TREECE: So why don't we go off the	14:25:33
16	record. That will allow you to review this.	14:25:34
17	THE VIDEOGRAPHER: Off record, 2:25.	14:25:36
18	(A recess was taken.)	14:25:39
19	THE VIDEOGRAPHER: On record, 2:32.	14:32:43
20	BY MR. TREECE:	14:32:46
21	Q Ms. Dembrowski, is Exhibit 5 a text	14:32:46
22	exchange between you and Amber Heard on May 25th,	14:32:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

89

1	2014?	14:32:55
2	MS. VASQUEZ: Objection; assumes facts,	14:32:55
3	lack of foundation, calls for a conclusion.	14:32:57
4	THE WITNESS: Yes.	14:33:03
5	BY MR. TREECE:	14:33:05
6	Q And at the beginning of the text exchange	14:33:07
7	here you reach out asking if Amber wants to talk;	14:33:09
8	isn't that right?	14:33:12
9	A Yes.	14:33:16
10	Q And do you recall that Amber and Johnny	14:33:17
11	took a flight from Boston to Los Angeles on the	14:33:21
12	24th of May, 2014?	14:33:25
13	MS. VASQUEZ: Objection; assumes facts,	14:33:28
14	lack of foundation, calls for speculation.	14:33:30
15	MS. HICKOX: Join.	14:33:33
16	THE WITNESS: I don't recall specific	14:33:36
17	dates, but...	14:33:38
18	BY MR. TREECE:	14:33:40
19	Q You're -- you're aware that there was an	14:33:41
20	incident on a plane involving Johnny and Amber in	14:33:43
21	May of 2014; is that right?	14:33:45
22	MS. VASQUEZ: Objection; assumes facts,	14:33:48

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

90

1	calls for speculation, vague and ambiguous, lack	14:33:50
2	of foundation.	14:33:54
3	MS. HICKOX: Join.	14:33:55
4	THE WITNESS: I wasn't aware of an	14:34:00
5	incident.	14:34:02
6	BY MR. TREECE:	14:34:03
7	Q All right. Well, you were aware that they	14:34:04
8	took a flight from Boston to LA in May of 2014,	14:34:06
9	correct --	14:34:10
10	MS. VASQUEZ: Objection.	14:34:10
11	BY MR. TREECE:	14:34:11
12	Q -- at or around the time of this text	14:34:11
13	exchange; is that right?	14:34:13
14	MS. VASQUEZ: Objection; calls for	14:34:14
15	speculation, asked and answered.	14:34:16
16	THE WITNESS: Again, I don't remember	14:34:21
17	specific dates and trips. There were a lot of	14:34:22
18	trips.	14:34:26
19	BY MR. TREECE:	14:34:29
20	Q All right. Well, let's -- let's take a	14:34:30
21	look at this text exchange. You reach out to see	14:34:32
22	if she wants to talk, and you don't recall why you	14:34:36

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

91

1 reached out as we sit here; is that right? 14:34:39

2 A I don't recall at this moment, no. 14:34:42

3 Q And Amber responds saying, I can't. I'm 14:34:46

4 sorry. But thank you for offering. And then you 14:34:50

5 respond saying, Could be things get better from 14:34:52

6 all this. May know enough to be helpful. I would 14:34:57

7 love if we could talk even a little. Do you see 14:35:00

8 that? 14:35:03

9 A Yes. 14:35:04

10 Q Does that refresh your recollection as to 14:35:05

11 what this incident relates to? 14:35:08

12 A No. 14:35:11

13 MS. VASQUEZ: Objection; vague and 14:35:11

14 ambiguous, calls for speculation, asked and 14:35:12

15 answered. 14:35:16

16 BY MR. TREECE: 14:35:16

IU; R; 17 Q And then it goes on to say, Yes, I hope he 14:35:16
H; IR;

MS; AR; 18 does get better this time. But I can't keep 14:35:20
SP; VA;

AF 19 staying, supporting him, just to watch him do it 14:35:22

20 all over again. He's done this many times before, 14:35:24

21 Tokyo, the island, London, and in parentheses, 14:35:27

22 remember that. Many, many times, and I always 14:35:31

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

92

IU; R; H; IR;	1	stay. Always believe he's going to get better.	14:35:33
MS; AR;	2	And then every three months or so I'm in the exact	14:35:36
SP; VA; AF	3	same position. Do you see that?	14:35:38
	4	A Yes.	14:35:43
	5	Q And Amber is mentioning Tokyo, the island,	14:35:44
	6	and London to you because those were all incidents	14:35:48
	7	where Johnny was high on drugs and alcohol and was	14:35:52
	8	out of control; is that right?	14:35:59
	9	MS. VASQUEZ: Objection; compound, assumes	14:36:01
	10	facts, calls for speculation, lack of foundation.	14:36:03
	11	MS. HICKOX: Join.	14:36:09
	12	THE WITNESS: She mentions them, but I	14:36:13
	13	don't know specifically the reasoning behind the	14:36:15
	14	mentioning them.	14:36:18
	15	BY MR. TREECE:	14:36:20
	16	Q Do you recall any incident in Tokyo?	14:36:21
	17	MS. VASQUEZ: Objection; vague and	14:36:23
	18	ambiguous, calls for speculation.	14:36:25
	19	MS. HICKOX: Join.	14:36:27
	20	THE WITNESS: I didn't travel to Tokyo	14:36:30
	21	with them. I wasn't there.	14:36:33
	22	BY MR. TREECE:	14:36:36

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

93

1	Q Are you aware of an incident in Tokyo that	14:36:36
2	she's -- of the incident in Tokyo that she's	14:36:39
3	referring to here?	14:36:42
4	MS. VASQUEZ: Objection; calls for	14:36:43
5	speculation, asked and answered, assumes facts,	14:36:45
6	vague and ambiguous, calls for --	14:36:48
7	MR. TREECE: You can have a running --	14:36:50
8	running objection.	14:36:52
9	MS. HICKOX: I'll join with those	14:36:53
10	objections.	14:36:55
11	THE WITNESS: I don't know that I recall	14:37:06
12	specific trips if I wasn't there.	14:37:09
13	BY MR. TREECE:	14:37:12
14	Q Do you see where she says, London,	14:37:12
15	remember that, exclamation point, question mark?	14:37:14
16	Do you see that?	14:37:18
17	A Yes.	14:37:19
18	Q She's expecting you -- you to remember	14:37:19
19	what happened in London, correct?	14:37:22
20	MS. VASQUEZ: Objection; calls for	14:37:24
21	speculation, asked and answered.	14:37:25
22	THE WITNESS: She's referencing it like I	14:37:32

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

94

1 should know London. 14:37:35

2 BY MR. TREECE: 14:37:36

3 Q As you sit here today do you know what the 14:37:36

4 London reference refers to? 14:37:39

5 MS. VASQUEZ: Objection; assumes facts, 14:37:42

6 lack of foundation, calls for speculation. 14:37:43

7 THE WITNESS: I don't know specifically 14:37:54

8 what she's referring to in London. 14:37:56

9 BY MR. TREECE: 14:37:58

10 Q Did she -- 14:37:58

11 A We were in and out of London a lot, so... 14:37:59

IU; R; 12 Q And she tells you that it's essentially a 14:38:01

H; IR; 13 three-month cycle, every three months or so he 14:38:05

MS; AR; 14 just builds up and he gets on a drug and 14:38:08

SP; VA; 15 alcohol-infused rage and then takes it out on 14:38:11

AF 16 Amber; isn't that right? 14:38:13

17 MS. VASQUEZ: Objection; assumes facts, 14:38:15

18 calls for speculation, lack of foundation, calls 14:38:16

19 for hearsay, compound. 14:38:19

IU; R; 20 MS. HICKOX: Join. 14:38:24

H; IR; 21 THE WITNESS: That's what she wrote. 14:38:27

MS; AR; 22 BY MR. TREECE: 14:38:30

SP; VA; 22

AF

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

95

IU; R; H; IR; 1	Q And you ask how they've been up to this	14:38:30
MS; AR; 2	point. And then she says, Great, perfect, heaven,	14:38:33
SP; VA; AF 3	until he decides to use. Do you see that?	14:38:37
4	A Yes.	14:38:44
5	Q And that was -- you were aware that that	14:38:45
6	was an ongoing issue between Amber and Johnny,	14:38:47
7	his -- his drug use and his behavior while under	14:38:50
8	the influence, correct?	14:38:53
9	MS. VASQUEZ: Objection; compound, assumes	14:38:54
10	facts, calls for speculation.	14:38:56
11	MS. HICKOX: Join.	14:38:58
12	THE WITNESS: I'm sorry?	14:39:09
13	MR. TREECE: Can the court reporter read	14:39:12
14	the last question back, please.	14:39:13
15	(The record was read as requested.)	14:39:14
16	THE WITNESS: I'm not -- I'm not aware of	14:39:39
17	it being an ongoing issue personally, but I know	14:39:41
18	that Amber referenced it occasionally, so...	14:39:46
19	BY MR. TREECE:	14:39:50
20	Q Amber told you that it was an ongoing	14:39:50
21	issue in the text chains that we've already looked	14:39:52
22	at today; isn't that right?	14:39:55

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

96

1	MS. VASQUEZ: Objection; asked and	14:39:57
2	answered, assumes facts, calls for hearsay,	14:39:58
3	misstates the document.	14:40:01
4	THE WITNESS: Yes, Amber would write it.	14:40:06
5	BY MR. TREECE:	14:40:13
6	Q And then Amber goes on to say, And the	14:40:13
7	drug abuse, all prescription meds, and drinking	14:40:16
8	has been slowly climbing every day. And we've	14:40:18
9	been fine except when there's any hiccup or issue	14:40:22
10	or problem. Then shit hits the fan because he	14:40:25
11	doesn't deal with it as Johnny, he deals with it	14:40:27
12	as a totally different person, a demon. Do you	14:40:30
13	see that?	14:40:33
14	A Yes.	14:40:33
IU; R; 15	Q And so Amber conveyed to you that Johnny	14:40:34
H; IR;		
MS; AR;16	acted like a demon when he was under the influence	14:40:37
SP; VA;		
AF 17	of drugs and alcohol; isn't that right?	14:40:41
18	MS. VASQUEZ: Objection; misstates the	14:40:43
19	document, calls for speculation, calls for	14:40:45
20	hearsay, vague.	14:40:49
21	MS. HICKOX: Join. And also lacks	14:40:51
22	foundation.	14:40:52

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

97

IU; R; H;
IR; MS;
AR; SP;
VA; AF

1	THE WITNESS: It is what she wrote.	14:40:57
2	BY MR. TREECE:	14:41:00
3	Q And what did you think about that?	14:41:01
4	MS. VASQUEZ: Objection; vague.	14:41:04
5	THE WITNESS: I thought she was dramatic	14:41:13
6	always.	14:41:17
7	BY MR. TREECE:	14:41:19
8	Q Do you see where it goes on to say, It was	14:41:19
9	the worst I've ever seen him. I think it's	14:41:22
10	because he's now taking Adderall on top of all of	14:41:24
11	the other shit, which is the equivalent to	14:41:27
12	consuming a pharmaceutical speedball every day.	14:41:29
13	He will die if he continues to call being sober	14:41:32
14	just not drinking. And his medicine kit includes	14:41:34
15	tons of new drugs. He's going to kill himself,	14:41:37
16	Christi. Do you see that?	14:41:40
17	A Yes.	14:41:41
18	Q And she -- were you concerned about his	14:41:43
19	drug use and what Amber is conveying to you in	14:41:48
20	this text message?	14:41:50
21	MS. VASQUEZ: Objection; calls for	14:41:52
22	speculation, assumes facts, lack of foundation.	14:41:53

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

98

1 MS. HICKOX: Join. And also compound. 14:41:58

2 THE WITNESS: I was never really sure 14:42:09

3 of -- of things not being presented as 14:42:16

4 overdramatic, so... 14:42:19

5 BY MR. TREECE: 14:42:23

R; AF; 6 Q After the -- the plane incident you 14:42:23
VA;

FSPK 7 actually engaged Dr. Kipper to try to get Johnny 14:42:26

8 sober, did you not? 14:42:29

9 MS. VASQUEZ: Objection; assumes facts, 14:42:31

10 vague and ambiguous, lack of foundation. 14:42:35

R; AF; 11 THE WITNESS: I'm sorry. You're asking if 14:42:55
VA;

FSPK 12 I engaged Dr. Kipper? 14:42:57

13 BY MR. TREECE: 14:42:59

R; AF; 14 Q Correct. 14:42:59
VA;

FSPK 15 A We introduced him to Dr. Kipper, yes. 14:43:04

16 Q And that was after the plane incident 14:43:07

17 where Johnny was belligerent and abusive; isn't 14:43:10

18 that right? 14:43:16

19 MS. VASQUEZ: Objection; assumes facts, 14:43:17

20 lack of foundation, compound, calls for 14:43:18

21 speculation, asked and answered. 14:43:21

22 THE WITNESS: I don't know the timeline, 14:43:27

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

99

1	but I don't recall that being a reason, so...	14:43:28
2	BY MR. TREECE:	14:43:32
3	Q What do you recall being the reason?	14:43:32
4	MS. VASQUEZ: Objection; vague.	14:43:35
5	THE WITNESS: I recall -- I recall -- I	14:43:51
6	recall that it was a good idea. It felt like a	14:43:58
7	good idea to have him meet with Dr. Kipper.	14:44:01
8	BY MR. TREECE:	14:44:09
9	Q Based on what information? What	14:44:10
10	information led you to conclude that that was a	14:44:11
11	good idea?	14:44:14
12	MS. VASQUEZ: Objection; calls for	14:44:16
13	hearsay.	14:44:19
14	THE WITNESS: Based on the idea that -- of	14:44:23
15	some of the, you know, medications or whatever	14:44:27
16	that he was taking.	14:44:36
17	BY MR. TREECE:	14:44:40
18	Q It was your understanding that he was	14:44:40
19	abusing those medications; isn't that right?	14:44:42
20	MS. VASQUEZ: Objection; calls for	14:44:44
21	speculation, calls for a medical opinion.	14:44:46
22	THE WITNESS: Yeah, because I don't --	14:44:54

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

100

1 abusing? 14:44:59

2 BY MR. TREECE: 14:44:59

3 Q Yeah, I'm asking for your opinion. I'm 14:44:59

4 not asking for an expert opinion. I'm asking for 14:45:01

5 your opinion. Was it your opinion that he was 14:45:04

6 abusing medications? 14:45:06

7 MS. VASQUEZ: Objection; vague and 14:45:07

8 ambiguous, calls for speculation. 14:45:09

9 THE WITNESS: I don't -- I don't know that 14:45:14

10 I like the word abusing, but -- but it was -- for 14:45:17

11 me, you know, I wanted him to be able to see 14:45:25

12 someone because if, in fact, he was taking any of 14:45:27

13 these things, it was something that was not 14:45:30

14 necessarily, you know, what I knew him to do. 14:45:33

15 BY MR. TREECE: 14:45:42

IU; R; 16 Q All right. And back to the exhibit we're 14:45:42

H; IR; 17 looking at, 17929 as the Bates number, Amber tells 14:45:44

MS; AR; 18 you, I don't want to lose the Johnny that I love, 14:45:48

SP; VA; 19 that we both love. I don't want to lose him. I 14:45:51

AF 20 want and need to lose the demon that he carries on 14:45:54

21 his back. Do you see that? 14:45:57

22 A Yes. 14:45:58

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

101

1	Q And she conveyed that to you. Did you	14:46:00
2	agree that he had a demon on his back that he	14:46:03
3	needed to get rid of?	14:46:06
4	MS. VASQUEZ: Objection; compound, vague	14:46:07
5	and ambiguous, calls for speculation.	14:46:09
6	THE WITNESS: I didn't feel he had a	14:46:16
7	demon --	14:46:18
8	BY MR. TREECE:	14:46:19
9	Q All right.	14:46:19
10	A -- on his back.	14:46:19
11	Q And then you go on to say to Amber that	14:46:21
12	you know Amber doesn't want to lose him and that	14:46:24
13	you know Amber loves him, correct?	14:46:27
14	A Uh-huh.	14:46:29
15	Q And then you go on to say, Needs help and	14:46:34
16	I don't have all the information to help alone.	14:46:39
17	Do you see that?	14:46:42
18	A Yes.	14:46:44
19	Q And you say that in response to this --	14:46:45
20	this text chain that we've been looking at where	14:46:48
21	Amber is telling you of all the issues he's having	14:46:50
22	with -- with drugs and alcohol; isn't that right?	14:46:54

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

102

1	MS. VASQUEZ: Objection; calls for	14:46:58
2	hearsay, assumes facts, misstates the document.	14:47:01
3	THE WITNESS: To me what I'm saying is I	14:47:12
4	love him and want to help him in whatever he would	14:47:15
5	need, but I don't have all of the information,	14:47:19
6	so...	14:47:22
7	BY MR. TREECE:	14:47:22
8	Q And then you go ahead and on the next page	14:47:23
9	ask if Amber would speak to you to fill you in,	14:47:26
10	correct?	14:47:30
11	A Yes.	14:47:37
12	Q And Amber says of course she will, she was	14:47:38
13	the only one that was sober during this whole	14:47:41
14	event that she's been discussing with you; isn't	14:47:44
15	that right?	14:47:48
16	MS. VASQUEZ: Objection; vague.	14:47:51
17	THE WITNESS: I don't know what she's	14:47:57
18	referring to in present for this whole thing. I'm	14:48:02
19	not sure what the reference is for that.	14:48:08
20	BY MR. TREECE:	14:48:09
21	Q Do you recall a flight where Johnny threw	14:48:10
22	ice at Amber, where Johnny kicked Amber in the	14:48:13

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

103

1	back, where Johnny slapped her in the face, and	14:48:17
2	where Johnny berated her for filming Adderall	14:48:20
3	Diaries with James Franco?	14:48:23
4	MS. VASQUEZ: Objection; compound, assumes	14:48:26
5	facts, lack of foundation, calls for hearsay,	14:48:28
6	calls for speculation.	14:48:31
7	MS. HICKOX: Join.	14:48:34
8	THE WITNESS: No.	14:48:35
9	BY MR. TREECE:	14:48:42
10	Q All right. And then if you'll turn to	14:48:43
11	17935. You-all discuss getting together to talk.	14:48:45
12	Amber says she's waiting at 72. And then you say,	14:49:04
13	Meet me in 66. Do you see that?	14:49:09
14	A I'm -- I'm trying to get to it.	14:49:11
15	Q Okay. I've got it on the screen for you.	14:49:14
16	A Okay. I'm -- I'm on that page.	14:49:31
17	Q All right. So she says, I'm waiting at 72	14:49:33
18	to talk if you want to. And you said, Meet me in	14:49:36
19	66. Do you see that?	14:49:39
20	MS. VASQUEZ: Objection; misstates the	14:49:43
21	document.	14:49:45
22	THE WITNESS: I -- I do see that.	14:49:51

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

104

1	BY MR. TREECE:	14:49:53
2	Q And that refers to one of the properties	14:49:53
3	at Sweetzer; is that right?	14:49:56
4	MS. VASQUEZ: Objection; vague.	14:49:59
5	THE WITNESS: Yes.	14:50:01
6	BY MR. TREECE:	14:50:03
7	Q And you-all met at -- at one of the	14:50:03
8	properties at Sweetzer on May 25th, 2014, correct?	14:50:06
9	MS. VASQUEZ: Objection; calls for	14:50:11
10	speculation, assumes facts.	14:50:13
11	THE WITNESS: I don't recall, but...	14:50:16
12	BY MR. TREECE:	14:50:21
13	Q So this text chain and -- and the events	14:50:22
14	surrounding it don't stand out in your mind?	14:50:26
15	A Not at the moment, no.	14:50:29
16	Q And then Amber responds after about three	14:50:31
17	hours after you say meet me in 66 and says, I'm	14:50:36
18	brokenhearted. And then you say, He is going to	14:50:40
19	see the doctor in the morning. Do you see that?	14:50:43
20	A Yes.	14:50:50
21	Q Had you ever sent -- had you ever sent	14:50:51
22	Johnny to a doctor for alcohol or drug treatment	14:50:54

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

105

1	before May 25th, 2014?	14:50:58
2	MS. VASQUEZ: Objection; assumes facts,	14:51:01
3	lack of foundation.	14:51:04
4	MS. HICKOX: Join.	14:51:08
5	THE WITNESS: I -- I -- I don't recall	14:51:09
6	dates. These are -- this is so long ago. I don't	14:51:11
7	recall dates.	14:51:15
8	BY MR. TREECE:	14:51:16
9	Q Yeah. Let me ask you this: Was Dr.	14:51:16
10	Kipper the first doctor that you recall engaging	14:51:18
11	to see Johnny over drug and alcohol use?	14:51:22
12	MS. VASQUEZ: Objection; assumes facts,	14:51:26
13	lack of foundation, calls for speculation.	14:51:28
14	THE WITNESS: Dr. Kipper is -- yeah,	14:51:38
15	that's who I recall having him meet.	14:51:45
16	BY MR. TREECE:	14:51:49
17	Q And it doesn't stand out for you a	14:51:50
18	particular reason that prompted you to reach out	14:51:53
19	to a doctor to get a doctor involved with Johnny	14:51:54
20	and his drug and alcohol use?	14:51:57
21	MS. VASQUEZ: Objection; compound,	14:51:59
22	argumentative, assumes facts, asked and answered.	14:52:01

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

106

1 THE WITNESS: There is no specific 14:52:10
2 incident or anything that I recall as being the 14:52:16
3 reason other than, you know, with all the -- the 14:52:20
4 thought that, you know, if he was doing anything 14:52:31
5 extra that I wasn't used to him ever doing that he 14:52:37
6 should meet with the doctor. 14:52:42

7 BY MR. TREECE: 14:52:44

8 Q Do you recall Amber telling you that 14:52:45
9 Johnny had kicked her when he was under the 14:52:48
10 influence of drugs and alcohol? 14:52:55

11 MS. VASQUEZ: Objection; calls for 14:52:59
12 hearsay, calls for speculation. 14:53:01

13 MS. HICKOX: Join. And it also assumes 14:53:03
14 facts not in evidence. 14:53:06

15 THE WITNESS: No. 14:53:08

16 BY MR. TREECE: 14:53:09

IR; R;
H; IR;
MS; AR;
SP; VA;
AF

17 Q And if you take a look at the text on 14:53:10
18 17937, do you see Amber saying, I don't need a 14:53:15
19 kick in the back to be hurt? Do you see that? 14:53:20

20 MS. HICKOX: Objection; it misstates the 14:53:40
21 contents of the document. 14:53:42

IR; R;
H; IR;
MS; AR;
SP; VA;
AF

22 THE WITNESS: I do see that. 14:53:46

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

107

1 BY MR. TREECE: 14:53:48

2 Q And -- and she then refers to her heart 14:53:48

3 aching. So she's essentially saying, you know, I 14:53:52

4 don't need him to physically hit me to be hurt, my 14:53:55

5 heart is aching; isn't that right? 14:53:58

6 MS. VASQUEZ: Objection; calls for 14:54:01

7 speculation, misstates the document, calls for 14:54:02

8 hearsay. 14:54:05

9 MS. HICKOX: Join. 14:54:05

10 THE WITNESS: No, I don't think that's 14:54:07

11 what it says. 14:54:09

12 BY MR. TREECE: 14:54:10

13 Q Do you recall -- I mean, I realize you 14:54:10

14 haven't had a specific recollection up to this 14:54:13

15 point; but do you recall Amber telling you that 14:54:15

16 Johnny kicked her? 14:54:18

17 A No. 14:54:20

18 MS. VASQUEZ: Objection; vague. 14:54:20

19 BY MR. TREECE: 14:54:25

IU; R; 20
H; IR;
MS; AR; 21
SP; VA;
AF 22

Q All right. And in this text message she 14:54:25

says, I am not going to keep falling back into the 14:54:29

same patterns that always repeat themselves. If 14:54:33

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

108

IU; R; 1 he truly wants to get help, beyond one doctor's 14:54:36
H; IR; 2
MS; AR; 2 appointment, truly decides to change his life, 14:54:39
SP; VA; 3
AF 3 then I hope he would come find me. But not until 14:54:42
4 he's made the decision. Not just saying he will, 14:54:45
5 which I have heard a thousand times from him. 14:54:49
6 I've heard him promise so many times the same 14:54:51
7 thing; and every time I trust him, believe him, 14:54:54
8 and every time he ends up hurting me. He ends up 14:54:56
9 hurting me. I don't need a kick in the back to be 14:55:00
10 hurt. Right now my heart is aching. I'm so hurt 14:55:03
11 and feel so lost without him. Do you see that? 14:55:05

12 MS. HICKOX: Objection; misstates the 14:55:09
13 document. 14:55:11

IU; R; H; 13
IR; MS; 14 THE WITNESS: Yes, I see that. 14:55:11
AR; SP; 14

VA; AF 15 BY MR. TREECE: 14:55:12

16 Q And she is conveying to you here what 14:55:13
17 we've seen previously, that there is a cycle of 14:55:16
18 drug abuse and rage on the part of Johnny that 14:55:19
19 keeps repeating itself over and over, correct? 14:55:24

20 MS. VASQUEZ: Objection; misstates the 14:55:27
21 document, calls for hearsay, calls for 14:55:29
22 speculation, assumes facts, lack of foundation. 14:55:33

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

109

1 MS. HICKOX: Join. 14:55:36

2 MS. VASQUEZ: It's compound. 14:55:39

3 THE WITNESS: I think she's -- you know, 14:55:47

4 she's stating that she has a concern, you know; 14:55:50

5 but I wouldn't -- I wouldn't say that she's 14:55:53

6 stating rage or whatever you just said because 14:55:58

7 it -- to me those words are written -- they have a 14:56:02

8 different meaning to me than what -- from the way 14:56:07

9 I'm reading it right now, they have a different 14:56:09

10 meaning than what you're alluding to. 14:56:12

11 BY MR. TREECE: 14:56:15

12 Q You tell Amber in -- in this chain she 14:56:15

13 needs to tell Johnny that she's scared; is that 14:56:19

14 right? 14:56:23

O 15 MS. VASQUEZ: Misstates the document. 14:56:27

16 THE WITNESS: I don't -- oh, wait. Yes. 14:56:31

17 BY MR. TREECE: 14:56:45

18 Q Okay. And you knew that Amber was scared 14:56:45

19 of Johnny when he behaved like this, correct? 14:56:47

O 20 MS. VASQUEZ: Objection; calls for 14:56:50

21 speculation. 14:56:52

22 MS. HICKOX: Join. 14:56:53

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

110

1	THE WITNESS: No.	14:56:55
2	BY MR. TREECE:	14:56:56
3	Q Why did you tell Amber to tell Johnny that	14:56:56
4	she was scared?	14:56:59
5	A I feel like from the relationship that I	14:57:03
6	had with her, it was more of scared of, you know,	14:57:05
7	losing him or breaking up. It wasn't scared in	14:57:08
8	the physical sense of scared. It was the	14:57:11
9	emotional scared.	14:57:14
10	Q And then do you see the text at the bottom	14:57:21
11	here that says, He should know because he should	14:57:24
12	love me. And know if anyone did this to you or	14:57:26
13	Lily-Rose he'd fucking kill them. He needs to be	14:57:29
14	accountable. Do you see that?	14:57:32
15	A Yes.	14:57:34
16	Q Do you know what that refers to?	14:57:35
17	MS. VASQUEZ: Objection; calls for	14:57:38
18	speculation.	14:57:40
19	MS. HICKOX: Join.	14:57:40
20	THE WITNESS: Specifically, no.	14:57:43
21	BY MR. TREECE:	14:57:45
22	Q And then do you see where it goes on to	14:57:45

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

111

1	say, And aware enough to know that. To know how	14:57:48
2	much I've been put through and how scared I must	14:57:52
3	be. I've given him a thousand sorrys and a	14:57:55
4	thousand chances and couldn't have been more	14:57:57
5	supportive throughout. Do you see that?	14:57:59
6	A Yes.	14:58:01
7	Q And he's not aware enough to know because	14:58:02
8	he blacks out; isn't that right?	14:58:05
O 9	MS. VASQUEZ: Objection; calls for	14:58:07
10	speculation, assumes facts, lack of foundation,	14:58:08
11	misstates the document, calls for hearsay.	14:58:11
12	MS. HICKOX: Join.	14:58:14
13	THE WITNESS: No.	14:58:16
14	BY MR. TREECE:	14:58:21
15	Q Now, she conveyed to you that he's not	14:58:21
16	aware enough to know what he's doing; is that	14:58:24
17	right?	14:58:27
O 18	MS. VASQUEZ: Objection; misstates the	14:58:27
19	document, vague and ambiguous.	14:58:29
20	MS. HICKOX: Join.	14:58:31
21	THE WITNESS: She -- she says that he's	14:58:36
22	not in aware -- well, aware enough to know that.	14:58:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

112

1	Yes, but it's more on an emotional is what she's	14:58:46
2	referring to.	14:58:51
3	BY MR. TREECE:	14:58:51
4	Q How do you gather that?	14:58:52
5	A From the relationship for all the years.	14:58:54
6	It's how she spoke. It's how we spoke.	14:58:58
7	Q All right. Well, I mean, before you	14:59:02
8	didn't really recall how you-all spoke. So why	14:59:04
9	don't you elaborate now that you seem to recall	14:59:06
10	how you-all spoke. How did you-all speak?	14:59:09
0	11 MS. VASQUEZ: Objection; vague, ambiguous,	14:59:12
	12 harassing, argumentative.	14:59:14
13	MS. HICKOX: Join.	14:59:19
14	THE WITNESS: Okay. I don't recall	14:59:21
15	specifics all the time, but I can recall general	14:59:23
16	in terms of some of these -- some of these texts,	14:59:28
17	the way they're written, they're much more about	14:59:33
18	emotional as opposed to, you know, the different	14:59:37
19	interpretation.	14:59:44
20	BY MR. TREECE:	14:59:45
21	Q So you're going off of what you're reading	14:59:45
22	off of the texts now?	14:59:47

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

113

1	A I'm sorry?	14:59:50
2	MS. VASQUEZ: Objection; vague, ambiguous,	14:59:50
3	harassing, argumentative.	14:59:53
4	MS. HICKOX: Join.	14:59:55.
5	BY MR. TREECE:	14:59:56
6	Q What I'm trying to understand is there was	14:59:56
7	an event on a -- on the plane where Amber says	15:00:00
8	that Johnny threw ice at her, that he slapped her,	15:00:03
9	that he kicked her in the back, and that was the	15:00:07
10	day before this text exchange. And I'm trying to	15:00:10
11	figure out if you know anything about that or if	15:00:12
12	the conclusions you're drawing about emotional	15:00:15
13	concerns are based solely on this text chain. I'm	15:00:18
14	trying to find out the source of your knowledge.	15:00:22
15	MS. VASQUEZ: Objection; argumentative,	15:00:26
16	unintelligible, vague and ambiguous, assumes	15:00:30
17	facts, lack of foundation, calls for hearsay.	15:00:35
18	MS. HICKOX: Join.	15:00:38
19	THE WITNESS: I've already stated that I	15:00:43
20	have no knowledge of any of what you just	15:00:45
21	described on a plane, no knowledge.	15:00:47
22	BY MR. TREECE:	15:00:53

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

114

1	Q And -- and what I'm trying to understand	15:00:54
2	is how you're deriving the conclusion that this is	15:00:55
3	only about emotional abuse when it referred to in	15:01:00
4	this chain a kick in the back?	15:01:03
5	MS. VASQUEZ: Objection; misstates prior	15:01:06
6	testimony, misstates the document, assumes facts,	15:01:10
7	calls for hearsay, calls for speculation --	15:01:14
8	MS. HICKOX: Join..	15:01:17
9	MS. VASQUEZ: -- argumentative.	15:01:18
10	MS. HICKOX: Join.	15:01:19
11	THE WITNESS: I don't even think I said	15:01:21
12	emotional abuse. I said that when we had	15:01:23
13	conversations, you know, she reached out to me for	15:01:29
14	anything or if there was a conversation about any	15:01:34
15	kind of an argument that the -- these descriptions	15:01:36
16	in here fit those kinds of conversations.	15:01:42
17	MS. HICKOX: Counsel, if you're about to	15:01:52
18	go to a next document, it is lunchtime in	15:01:53
19	California.	15:01:55
20	MR. TREECE: Sure.	15:01:57
21	MS. HICKOX: If we could take a lunch	15:01:58
22	break.	15:02:00

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

115

1	MR. TREECE: Not a problem.	15:02:00
2	MS. VASQUEZ: Forty-five minutes everyone?	15:02:01
3	MS. HICKOX: That works for me.	15:02:03
4	MS. VASQUEZ: Okay. Thanks.	15:02:06
5	THE VIDEOGRAPHER: Anything else before we	15:02:08
6	go off record, Mr. Treece?	15:02:09
7	MR. TREECE: No.	15:02:10
8	THE VIDEOGRAPHER: Off record, 3:02.	15:02:12
9	(A recess was taken.)	15:02:14
10	THE VIDEOGRAPHER: On record, 3:50.	15:50:52
11	BY MR. TREECE:	15:50:55
12	Q Ms. Dembrowski, I'm going to show you what	15:50:59
13	has been marked as Exhibit 6. I'm going to put	15:51:01
14	that in the Chat box and then share screen.	15:51:04
15	(Exhibit 6 was marked for identification	15:51:14
16	and is attached to the transcript.)	15:51:18
17	BY MR. TREECE:	15:51:18
18	Q Ms. Dembrowski, I'll represent to you --	15:51:18
19	and can everyone see the screen there? I want to	15:51:23
20	make sure I'm -- can you see Exhibit 6 on the	15:51:25
21	screen?	15:51:29
22	A Yes.	15:51:30

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35065

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Conducted on February 22, 2022

116

1 Q All right. And this is a -- a production 15:51:31
2 from Johnny Depp's counsel that includes a lot of 15:51:37
3 different texts. So the same approach as before. 15:51:41
4 If you want to read them all, we can go off the 15:51:45
5 record and you can do that, or I can go through 15:51:47
6 and ask you about the ones that -- that you're on. 15:51:50
7 Do you want to -- would you like to read them all 15:51:54
8 or would you like me to go through and ask you 15:51:57
9 about the ones that you're on? 15:51:58
10 A I'd like to read them. 15:51:58
11 MR. TREECE: All right. Let's go off the 15:51:59
12 record. 15:52:01
13 THE VIDEOGRAPHER: Off record, 3:52. 15:52:01
14 (A recess was taken.) 15:52:05
15 THE VIDEOGRAPHER: On record, 4:01. Do we 16:01:22
16 need to go off? 16:01:41
17 MS. VASQUEZ: No. I'm going to object to 16:01:42
18 counsel for Ms. Heard taking us off the record. 16:01:46
19 First and foremost, Mr. Treece is not allowed 16:01:51
20 unilaterally to take us off the record. He needs 16:01:54
21 agreement of all counsel. 16:01:57
22 Second of all, Ms. Dembrowski and none of 16:01:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

117

1 us are going to sit here for 15 hours so that he 16:02:02
2 can get seven hours of tape time and keep taking 16:02:06
3 us off the record so the witness can review 16:02:09
4 documents that he's providing her that are 24 16:02:11
5 pages long. 16:02:15

6 So from now on if Ms. Dembrowski needs to 16:02:16
7 review a document, I'm going to insist that she 16:02:20
8 does it on the record so it counts against his 16:02:22
9 time. If he would like to direct the witness to 16:02:25
10 questions and specific passages, but he also has 16:02:28
11 to allow her to read the document entirely if she 16:02:30
12 so chooses. But I am not going to agree to going 16:02:33
13 off the record every time Mr. Treece shows this 16:02:38
14 witness a document. 16:02:42

15 MR. TREECE: And I would like -- 16:02:44

16 MS. VASQUEZ: And the court reporter needs 16:02:45
17 to allow -- you need agreement of all counsel to 16:02:46
18 go off the record. I know the court reporter 16:02:49
19 knows that. 16:02:52

20 MR. TREECE: And I would point out for the 16:02:53
21 record that this is a document that was produced 16:02:55
22 by Depp's counsel that has all manner of -- of 16:02:57

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

118

1	texts that don't relate to the witness and --	16:03:01
2	MS. VASQUEZ: Your -- it's your	16:03:03
3	deposition, Mr. Treece. You're the one choosing	16:03:05
4	to show it to a witness that didn't produce it --	16:03:07
5	MR. TREECE: That's correct.	16:03:09
6	MS. VASQUEZ: -- and doesn't have --	16:03:10
7	MR. TREECE: Camille, Camille, I was quiet	16:03:11
8	while you objected. I was quiet while you	16:03:14
9	objected. Let me get on the record, please.	16:03:14
10	Goodness gracious.	16:03:16
11	So point being is I'm going to direct the	16:03:17
12	witness to the relevant text messages to review	16:03:20
13	them. What I'm trying to avoid is some extended	16:03:22
14	period of review over irrelevant stuff that the	16:03:24
15	witness doesn't need to review because it's not	16:03:27
16	relevant to my inquiry. And so that's sort of	16:03:29
17	where we are on that. So with that we'll -- we'll	16:03:32
18	proceed.	16:03:35
19	BY MR. TREECE:	16:03:35
20	Q Ms. Dembrowski, if you'll take a look at	16:03:36
21	the first page of Exhibit 6. Do you see the first	16:03:37
22	entry there that has Sis and a phone number in the	16:03:41

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

119

1	Participant column?	16:03:49
2	A Yes.	16:03:51
3	Q And is that your phone number?	16:03:51
4	A The number next to Sis?	16:03:53
5	Q Correct.	16:03:55
6	A You know, I'm going to see if I can make	16:03:58
7	this bigger. Sorry.	16:04:00
8	Q Sure. And -- and you can -- it's in the	16:04:02
9	Chat box if you want to download it.	16:04:05
10	A I did. I downloaded it. I'm going to see	16:04:07
11	if I can just make it a little bit bigger.	16:04:09
12	I'm not seeing how to do that, so I'll do	16:04:32
13	my best.	16:04:34
14	Q If you press control and plus, that will	16:04:35
15	do it, when you're on the document.	16:04:38
16	And control and minus zooms out.	16:04:50
17	THE TECHNICIAN: She's on a Mac. And,	16:04:53
18	also, you'll need to pass her remote control for	16:04:55
19	her to --	16:04:59
20	MR. TREECE: Okay. Well, maybe I can --	16:05:00
21	maybe I can zoom in. Let me know if this helps.	16:05:02
22	Does that do it?	16:05:05

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

120

1	THE WITNESS: I think I found something.	16:05:06
2	Wait one second.	16:05:07
3	Okay. I've figured out how to zoom in.	16:05:25
4	BY MR. TREECE:	16:05:27
5	Q Okay. Is that your number beside the word	16:05:28
6	Sis --	16:05:31
7	A No.	16:05:31
8	Q -- in the first column that says 1578	16:05:32
9	under Chat number?	16:05:36
10	A No.	16:05:37
11	Q Is that Debbie Depp's number?	16:05:38
12	A No.	16:05:41
13	Q Do you know whose number that is?	16:05:42
14	A No.	16:05:45
15	Q Do you know -- strike that.	16:05:49
16	And then do you see where it says Chris	16:05:51
17	Dembrowski?	16:05:54
18	A Yes.	16:05:56
19	Q Does that refer to you?	16:05:57
20	A No.	16:06:00
21	Q Who does that refer to?	16:06:01
22	MS. VASQUEZ: Objection; calls for	16:06:04

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35070

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Conducted on February 22, 2022

121

1	speculation.	16:06:05
2	MS. HICKOX: Join.	16:06:06
3	THE WITNESS: I think it refers to Johnny.	16:06:15
4	BY MR. TREECE:	16:06:21
5	Q And why would you think that refers to	16:06:21
6	Johnny?	16:06:23
7	A I'm looking at what's next to it.	16:06:28
8	Q And specifically what are you looking at?	16:06:31
9	A An E-mail address.	16:06:40
10	Q And is that the E-mail address	16:06:42
11	richardt@aol.com?	16:06:48
12	A Yes.	16:06:49
13	Q And is that one of Johnny's E-mail	16:06:50
14	addresses?	16:06:52
15	A I think it was an old E-mail address,	16:06:58
16	so...	16:07:01
17	Q Is -- is that one of Johnny's old E-mail	16:07:01
18	addresses?	16:07:04
19	MS. VASQUEZ: Objection; calls for	16:07:04
20	speculation, asked and answered.	16:07:06
21	THE WITNESS: Yeah, I believe it's an old	16:07:12
22	reference to him.	16:07:14

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

122

1	MR. TREECE: All right. And, Camille,	16:07:19
2	we'll address whether or not Johnny has made a	16:07:21
3	production from that E-mail address at a later	16:07:25
4	date. We don't need to do that now.	16:07:27
5	BY MR. TREECE:	16:07:29
6	Q All right. If you will turn to Depp	16:07:30
7	11249, I will tell you just because of the	16:07:36
8	orientation it's the one that says page 10 at the	16:07:38
9	bottom. And I'm scrolling there myself. Let me	16:07:41
10	know when you're with me. And if you're looking	16:07:44
11	at the screen, that may help.	16:07:47
12	Are you with me?	16:08:02
13	A I'm -- I'm on page 10.	16:08:03
14	Q Okay. And I'm looking at the top of	16:08:05
15	page 10. Do you see the chat number 1646?	16:08:08
16	A Yes.	16:08:14
17	Q And then it says Christi Dembrowski and	16:08:15
18	there's a phone number to the left of that. Do	16:08:18
19	you see that?	16:08:20
20	A Yes.	16:08:21
21	Q And is that your phone number?	16:08:21
22	A Yes.	16:08:24

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

123

1	Q All right. And so then over in the From	16:08:25
2	column, this is a text from you to Johnny,	16:08:28
3	correct?	16:08:31
4	A Oh, yes.	16:08:39
5	Q And this is a text from you to Johnny on	16:08:40
6	July 10th, 2013, correct?	16:08:43
7	A Yes.	16:08:48
8	Q And you say, She wants to talk to me. She	16:08:50
9	doesn't know what to do, loves you but doesn't	16:08:53
10	always want to do. She's worry about it all. Do	16:08:57
11	you see that?	16:09:01
12	A Yes.	16:09:02
13	Q Do you recall what that refers to?	16:09:03
14	A No.	16:09:06
15	Q The "she" there refers to Amber Heard,	16:09:07
16	does it not?	16:09:10
17	MS. VASQUEZ: Objection; calls for	16:09:11
18	speculation, asked and answered.	16:09:12
19	BY MR. TREECE:	16:09:12
20	Q And I can help you with that. Why don't	16:09:32
21	you look at the -- the next text below that. Do	16:09:34
22	you see there's a -- a text from Johnny to you on	16:09:36

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

124

1	July 10th, 2013 with the same chat number?	16:09:41
2	A Yes.	16:09:48
3	Q And Johnny says to you, It was not a	16:09:49
4	pleasant day today. And then he goes on to say, I	16:09:53
5	don't need actress bullshit and her fucking	16:09:57
6	ambition. Do you see that?	16:09:59
7	A Yes.	16:10:01
8	Q And so he's -- this text exchange between	16:10:01
9	you two refers to Amber Heard, does it not?	16:10:04
10	MS. VASQUEZ: Objection; calls for	16:10:08
11	speculation.	16:10:09
12	THE WITNESS: I don't recall the text,	16:10:14
13	so...	16:10:16
14	BY MR. TREECE:	16:10:18
15	Q All right. Do you see the text I just	16:10:18
16	read from Johnny where it says, I wasn't aware she	16:10:20
17	had another goddamn photo shoot tomorrow, that's	16:10:23
18	really why she fucking left. I don't need actress	16:10:26
19	bullshit and her fucking ambition.	16:10:28
20	A Yes.	16:10:28
21	Q Do you see that?	16:10:31
22	A Yes.	16:10:31

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

125

1	Q If that doesn't refer to Amber, who would	16:10:32
2	it refer to?	16:10:34
3	MS. VASQUEZ: Objection; asked and	16:10:35
4	answered, badgering, calls for speculation.	16:10:37
5	MS. HICKOX: Join.	16:10:42
6	THE WITNESS: I don't know who else it	16:10:43
7	would refer to, so...	16:10:44
8	BY MR. TREECE:	16:10:46
9	Q Would you agree with me that looking at	16:10:46
10	these two texts together the only person that	16:10:48
11	could refer to is Amber Heard?	16:10:50
12	MS. VASQUEZ: Objection; asked and	16:10:52
13	answered, calls for speculation.	16:10:53
14	MS. HICKOX: Join.	16:10:55
15	THE WITNESS: It could.	16:11:03
16	BY MR. TREECE:	16:11:07
17	Q Did Johnny express frustration over	16:11:07
18	Amber's career and her ambition to you other than	16:11:13
19	in this text?	16:11:16
20	MS. VASQUEZ: Objection; assumes facts,	16:11:17
21	calls for hearsay, vague and ambiguous, lack of	16:11:19
22	foundation.	16:11:22

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

126

1	MS. HICKOX: Join.	16:11:23
2	THE WITNESS: Not that I recall	16:11:26
3	specifically.	16:11:28
4	BY MR. TREECE:	16:11:33
5	Q I'm going to go to page 15 at the bottom,	16:11:33
6	and it's got a Bates number of 11254. And do you	16:11:38
7	see at the top the text from -- strike that.	16:11:47
8	Is the top line with the chat number 1646	16:11:51
9	a text from Johnny to you dated October 20th,	16:11:55
10	2013?	16:12:00
11	A I'm sorry. I'm trying to find it, so...	16:12:00
12	Q Oh, sure. It's -- it has 15 -- page 15 at	16:12:03
13	the bottom.	16:12:07
14	MS. VASQUEZ: Counsel, there's numerous	16:12:10
15	chats with the number 1646 just on page 15 alone,	16:12:13
16	so you might want to identify it by the number to	16:12:17
17	the left of Chat.	16:12:20
18	BY MR. TREECE:	16:12:25
19	Q Are you with me on page 15?	16:12:25
20	A I'm not even on page 15 yet.	16:12:26
21	Q Okay. It's -- it's not 15 of the .pdf.	16:12:29
22	It's the one that says 15. It's page 4 of the	16:12:33

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

127

1	.pdf.	16:12:37
2	A Right, no, I -- okay, I see -- I see it.	16:12:37
3	Q All right. And if you take a look at the	16:12:39
4	top, do you see where it says chat number 1646 and	16:12:41
5	it's a text at the top from Johnny to you dated	16:12:44
6	October 20th, 2013?	16:12:49
7	MS. VASQUEZ: Objection; misstates the	16:12:52
8	document. As I have already said, there are	16:12:54
9	numerous chats numbered 1646 on this page.	16:12:56
10	MR. TREECE: I'm reading the -- the top	16:13:00
11	line and I thought I made that clear. Let me	16:13:03
12	restate it.	16:13:06
13	BY MR. TREECE:	16:13:07
14	Q Do you see the top line where it says chat	16:13:07
15	number 1646 and it's a text from Johnny to you	16:13:10
16	dated October 20th, 2013?	16:13:13
17	MS. VASQUEZ: Same objection.	16:13:17
18	THE WITNESS: Yes.	16:13:23
19	BY MR. TREECE:	16:13:24
20	Q All right. And then the chat number is --	16:13:24
21	refers -- appears through the string of chats that	16:13:30
22	you-all had in connection with that chain. And if	16:13:34

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

128

1 you look below that, so Johnny -- there's a 16:13:36
2 chat -- there's a text from him at the top. Then 16:13:40
3 there's a -- there's three more rows on this page. 16:13:43
4 Are all of these rows chats that you and Johnny 16:13:46
5 had on October 20th, 2013? 16:13:49
6 MS. VASQUEZ: Objection; calls for a 16:13:52
7 conclusion, calls for speculation, and assumes 16:13:53
8 facts. 16:13:58
9 MS. HICKOX: And, Christi, you can take 16:14:00
10 your time to review these messages. 16:14:02
11 THE WITNESS: Okay. 16:14:06
12 BY MR. TREECE: 16:14:06
13 Q And just to be clear for the record, I'm 16:14:07
14 not going to ask you any details about the -- the 16:14:08
R 15 messages. I just want to confirm -- in terms of 16:14:11
16 your review, I just want to confirm that these are 16:14:13
17 texts between you and Johnny on October 20th, 2013 16:14:16
18 on page 15. 16:14:19
19 A I'm going to review them, okay? 16:14:32
20 Q If you feel like you need to. Again, I -- 16:14:34
21 can you not tell based on the participants in the 16:14:38
22 From line? 16:14:40

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

129

R

1 A It references both of our -- both of us, 16:14:45

2 yes. 16:14:49

3 Q And would that indicate to you that that's 16:14:49

4 texts between you and Johnny on October 20th, 16:14:51

5 2013? 16:14:55

6 MS. VASQUEZ: Objection; calls for a 16:14:55

7 conclusion, vague and ambiguous. The witness -- 16:14:57

8 asked and answered. The witness needs to review 16:15:00

9 the messages to answer your question. She's made 16:15:02

10 that abundantly clear. 16:15:04

11 MS. HICKOX: I'm also going to join and 16:15:06

12 add that it calls for speculation. She hasn't 16:15:08

13 seen these messages in this format. 16:15:10

14 MR. TREECE: Well, she did take time off 16:15:13

15 the record to review them, so I'm not sure how 16:15:14

16 much she got through. But I will -- 16:15:16

17 MS. HICKOX: Just to clarify -- 16:15:19

18 MR. TREECE: -- off the record to do that. 16:15:21

19 MS. HICKOX: All right. 16:15:22

20 BY MR. TREECE: 16:15:22

21 Q But go ahead. I'm just trying to speed it 16:15:23

22 along. I mean, we can sit here forever, but I'm 16:15:26

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

130

1 trying to move through this quickly, so... 16:15:29

2 A I was trying to review the format before. 16:15:31

3 Q Okay. All right. Well, take the time you 16:15:33

4 think you need and then we'll -- we'll address 16:15:36

5 anything else later. 16:15:38

6 A Okay. 16:17:18

R 7 Q And are those texts between you and Johnny 16:17:18

8 on October 20th, 2013 on page 1124? 16:17:22

9 A Yes. 16:17:29

10 Q All right. I'm going to direct you to -- 16:17:30

11 MS. HICKOX: Mr. Treece, just belated 16:17:33

12 objection. It's Depp 11254. 16:17:36

13 MR. TREECE: 11254, thank you. That's not 16:17:39

14 necessarily an objection. That's an appropriate 16:17:41

15 correction. Thank you. 16:17:43

16 BY MR. TREECE: 16:17:44

17 Q All right. If you'll scroll to page 25, 16:17:44

18 where it says 25 at the bottom. And let me know 16:17:51

19 when you're with me. 16:18:08

20 A I will. 16:18:10

21 Okay. 16:18:23

22 Q Do you see the text from Lily-Rose to her 16:18:23

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

131

1 dad, Johnny, that says, You've been a better dad 16:18:28
2 to Jack and I since she's been around and she was 16:18:31
3 helping with the alcohol problem. I just see what 16:18:33
4 a positive effect she's had on you and I'm afraid 16:18:36
5 that those things will leave with her. Do you see 16:18:40
6 that? 16:18:43
7 A No. I'm looking for it. 16:18:44
8 Q Okay. It's the -- page 25 at the bottom. 16:18:46
9 The Bates number is 11264. And it's the third 16:18:49
10 from the bottom. 16:18:55
11 A I see it. 16:19:09
12 Q And did Lily-Rose ever express a similar 16:19:10
13 feeling with you in terms of how she viewed Amber 16:19:15
14 and Amber's effect on Johnny? 16:19:20
15 MS. VASQUEZ: Objection; compound, assumes 16:19:22
16 facts, lack of foundation, calls for speculation, 16:19:24
17 calls for hearsay. 16:19:26
18 MS. HICKOX: Join. 16:19:28
19 THE WITNESS: No. 16:19:38
20 BY MR. TREECE: 16:19:38
21 Q Were you aware that Johnny was a better 16:19:38
22 dad when Amber was around? 16:19:41

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

132

1	MS. VASQUEZ: Objection; assumes facts,	16:19:42
2	calls for speculation, calls for hearsay.	16:19:45
3	MS. HICKOX: Join.	16:19:49
4	THE WITNESS: No.	16:19:52
5	BY MR. TREECE:	16:19:52
6	Q All right. If you'll take a look at the	16:19:56
7	top of the next page, and this is page 26, Bates	16:19:57
8	number 11265. Are you with me?	16:20:04
9	A I'm looking.	16:20:10
10	I'm sorry. The -- it's just weird to get	16:20:14
11	to the page numbers on my computer.	16:20:18
12	Q It should be the very next page. Just	16:20:20
13	scroll down to the very next page.	16:20:22
14	A What's the page number of the very next	16:20:32
15	page?	16:20:34
16	Q It's page 26, the bottom.	16:20:34
17	A Okay.	16:20:39
18	Q The one we just looked at was 25.	16:20:39
19	A Okay.	16:20:42
20	Q Are you with me?	16:20:57
21	A Yes.	16:20:58
22	Q All right. Do you see where Lily says to	16:20:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

133

1	Johnny, But what about you as a dad? You've been	16:21:01
2	so much better since she's been around. We've	16:21:05
3	talked about how for a couple of years you weren't	16:21:08
4	around us and that changed when Amber came into	16:21:10
5	your life. I don't want to go back to that. Do	16:21:13
6	you see that?	16:21:16
7	A Yes.	16:21:16
8	Q And did any of Johnny's children ever	16:21:16
9	express a similar sentiment to you?	16:21:19
10	MS. VASQUEZ: Objection; vague and	16:21:24
11	ambiguous, calls for hearsay.	16:21:25
12	THE WITNESS: No.	16:21:28
13	BY MR. TREECE:	16:21:30
14	Q Would -- would you agree that Johnny was a	16:21:31
15	better dad when Amber was around?	16:21:34
16	MS. VASQUEZ: Objection; asked and	16:21:36
17	answered literally five seconds ago.	16:21:38
18	THE WITNESS: Johnny's always been a great	16:21:44
19	dad.	16:21:46
20	BY MR. TREECE:	16:21:50
21	Q And then she goes on to say, But you have	16:21:50
22	to acknowledge and you know what a good influence	16:21:53

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

134

1	she's had on you and the fact that that's changed	16:21:56
2	you for the better. You see that, right. Do you	16:21:59
3	see that?	16:22:01
4	A Yes.	16:22:02
5	Q And do you have any personal knowledge	16:22:06
6	about Lily-Rose's views of Amber Heard?	16:22:08
7	MS. VASQUEZ: Objection; calls for	16:22:13
8	speculation, calls for hearsay, assumes facts,	16:22:16
9	vague.	16:22:20
10	MS. HICKOX: Join.	16:22:21
11	THE WITNESS: That's -- that's more of a	16:22:24
12	question for her, not me.	16:22:26
13	BY MR. TREECE:	16:22:28
14	Q So you don't have any personal knowledge	16:22:29
15	of her views with respect to Amber?	16:22:30
16	MS. VASQUEZ: Objection; asked and	16:22:33
17	answered, vague.	16:22:35
18	THE WITNESS: Is there a specific	16:22:45
19	timeline?	16:22:47
20	BY MR. TREECE:	16:22:48
21	Q This time frame, the time frame we're	16:22:48
22	looking at here, which is February 2014.	16:22:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

135

1 A No. 16:22:54

2 Q All right. And then do you see the text 16:22:54

3 from you below the ones we were reading from -- 16:22:59

IU; R; 4 between Lily and Johnny? And these are on 16:23:04

H; IR; 5 February 5th, 2014 where you send a text to Johnny 16:23:07

MS; AR; 6 saying, Stop drinking; you send another text, Stop 16:23:12

SP; VA; 7 coke; you send another text, Stop pills. Do you 16:23:16

AF 8 see that? 16:23:19

9 A Yes. 16:23:19

10 Q Those are pretty pointed statements from 16:23:21

11 you to him, wouldn't you agree? 16:23:23

12 MS. VASQUEZ: Objection; vague and 16:23:25

13 ambiguous, mischaracterizes the document. 16:23:27

14 MS. HICKOX: Join. 16:23:32

15 THE WITNESS: I wouldn't call them pointed 16:23:36

16 statements, no. 16:23:38

17 BY MR. TREECE: 16:23:41

IU; R; 18 Q Why did you send three separate texts, one 16:23:41

H; IR; 19 saying stop drinking, one saying stop coke, and 16:23:45

MS; AR; 20 one saying stop pills? 16:23:48

SP; VA; AF 21 A I would have to know other texts 16:23:54

22 surrounding it, so I don't know. 16:23:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

136

1	Q Well, you -- you've got what we've got	16:24:02
2	here. So as you sit here and look at this today,	16:24:04
3	do you have any reason why you would want to send	16:24:08
4	three separate texts, each declaring him to stop	16:24:11
5	doing one of three things related to drugs and	16:24:14
6	alcohol?	16:24:18
7	MS. VASQUEZ: Objection; mischaracterizes	16:24:18
8	the prior testimony, asked and answered.	16:24:21
9	MS. HICKOX: Also calls for speculation,	16:24:25
10	join in the other objections.	16:24:27
11	And, Ms. Dembrowski, I'm just going to	16:24:29
12	remind you not to guess if you don't know.	16:24:31
13	THE WITNESS: Well, that's -- that's the	16:24:33
14	thing. I would have to -- I would have to	16:24:35
15	speculate as to why.	16:24:36
16	BY MR. TREECE:	16:24:37
17	Q This doesn't stand out in your mind as a	16:24:37
18	time where you were trying to reign Johnny in from	16:24:39
19	his drug and alcohol use; is that what you're	16:24:43
20	saying?	16:24:49
21	MS. VASQUEZ: Objection; mischaracterizes	16:24:50
22	the prior testimony, vague and ambiguous.	16:24:52

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

137

1	THE WITNESS: It -- it does not stand out	16:24:58
2	specifically to me, no.	16:25:00
3	BY MR. TREECE:	16:25:28
4	Q I'm going to direct your attention to	16:25:28
5	page 32, Bates number 11271.	16:25:31
6	A Sorry. It takes me a minute to get to the	16:25:48
7	page number.	16:25:51
8	Okay, I'm on the page.	16:26:07
9	Q All right. Do you see the last two texts	16:26:09
10	on this page dated May 27th, 2014?	16:26:11
11	A Yes.	16:26:20
12	Q And the -- the first of those two texts is	16:26:22
13	a text from you to Johnny on May 27th, 2014 at	16:26:26
14	3:12 a.m.; is that right?	16:26:32
15	A Yes.	16:26:37
16	Q And you say, Hope you had a great flight.	16:26:39
17	I bet you're tired. I just wanted to let you know	16:26:42
18	that I spoke with her and she wants to speak to	16:26:44
19	the doctor if you're okay with it, I told her you	16:26:47
20	were, so he can explain better than me. But she	16:26:50
21	was much better about trying and wanting to	16:26:53
22	understand than I thought. She just wants to do	16:26:56

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

138

1 the right thing and help you and also help you to 16:26:59
2 understand how important it is to her. Do you see 16:27:02
3 that? And then it goes on, How important it is to 16:27:05
4 her that you are healthy. Do you see that? 16:27:09
5 A Yes. 16:27:12
6 Q And this is two days -- you may recall we 16:27:12
7 looked at the exhibit from May 25th, 2014, and I 16:27:16
8 was asking you if that referred to a plane 16:27:19
9 incident and you didn't recall. Does this refresh 16:27:21
10 your recollection in any way? 16:27:25
11 A No. 16:27:27
12 Q And we had talked about how around that 16:27:31
13 date you had decided to engage Dr. Kipper. Do you 16:27:34
14 recall that? 16:27:38
15 MS. VASQUEZ: Objection; misstates prior 16:27:39
16 testimony. 16:27:41
17 THE WITNESS: I don't recall around the 16:27:43
18 date. 16:27:44
19 BY MR. TREECE: 16:27:45
20 Q All right. If you'll scroll back up to 16:27:45
21 page 29. Let me know when you're with me. And 16:28:05
22 this is Bates number 11268. 16:28:15

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

139

1	A Okay.	16:28:28
2	Q Do you see the -- the text second from the	16:28:29
3	bottom from Amber Heard to Stephen Deuters that	16:28:32
4	says, Spoke to C. We're going to set him up with	16:28:36
5	Dr. Kipper on Wednesday hopefully. He won't be	16:28:40
6	skipping it this time. Do you see that?	16:28:43
7	A Yes.	16:28:44
8	Q And that's dated May 25th, 2014, correct?	16:28:45
9	A Yes.	16:28:49
10	Q And "C" there refers to you, does it not?	16:28:50
11	MS. VASQUEZ: Objection; calls for	16:28:53
12	speculation, vague and ambiguous.	16:28:54
13	THE WITNESS: I'm not sure.	16:28:59
14	BY MR. TREECE:	16:29:01
15	Q Does that refresh your recollection about	16:29:02
16	trying to get Johnny to see Dr. Kipper and the	16:29:04
17	date?	16:29:07
18	A No.	16:29:08
19	Q Do you have any reason to doubt that	16:29:10
20	you-all were trying to set Johnny up with Dr.	16:29:12
21	Kipper on or around May 25th, 2014?	16:29:15
22	MS. VASQUEZ: Objection; assumes facts,	16:29:18

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

140

1 . vague. 16:29:20

2 THE WITNESS: I don't -- I don't recall 16:29:27

3 any -- any reason to remember dates. I don't -- 16:29:28

4 the dates aren't -- they don't help me right now. 16:29:31

5 BY MR. TREECE: 16:29:34

6 Q All right. Well, let's -- let's go back 16:29:34

7 to your text messages on page 32. 16:29:36

8 A Okay. 16:29:46

9 Q And do you see -- we reviewed the text 16:29:47

10 number 69890. Now I want to look at the text 16:29:51

11 number 69892. Is this a response from Johnny to 16:29:56

12 you on May 27th, 2014? 16:30:00

13 MS. VASQUEZ: Objection; assumes facts, 16:30:03

14 calls for a conclusion. 16:30:05

15 THE WITNESS: Yes. 16:30:10

16 BY MR. TREECE: 16:30:11

17 Q And he says, No reason for her to speak to 16:30:12

18 anyone, let alone a doctor. I'm out. I'm done. 16:30:14

19 Do you see that? 16:30:19

20 A Yes. 16:30:20

21 Q So he didn't want to see Dr. Kipper; isn't 16:30:20

22 that right? 16:30:23

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

141

1	MS. VASQUEZ: Objection; misstates the	16:30:25
2	document, calls for hearsay, calls for	16:30:26
3	speculation.	16:30:28
4	MS. HICKOX: Join.	16:30:30
5	THE WITNESS: I'm sorry. I think I	16:30:32
6	misunderstood your question. Could you ask it	16:30:35
7	again?	16:30:36
8	MR. TREECE: Can I have the court reporter	16:30:38
9	read my question back, please.	16:30:39
10	(The record was read as requested.)	16:30:40
11	THE WITNESS: I -- I don't see where it	16:30:55
12	says he didn't want to see a doctor in that text.	16:30:57
13	BY MR. TREECE:	16:31:02
14	Q Okay. Was he willing to see Dr. Kipper	16:31:02
15	when you indicated to him that you-all had reached	16:31:06
16	out to Dr. Kipper to help him?	16:31:11
17	MS. VASQUEZ: Objection; assumes facts,	16:31:12
18	calls for speculation.	16:31:14
19	MS. HICKOX: Join.	16:31:16
20	THE WITNESS: Again, I don't recall	16:31:22
21	specifically dates and each instance.	16:31:24
22	BY MR. TREECE:	16:31:30

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

142

1 Q That's why these text messages are -- are 16:31:30
2 meant to help you with your recollection of dates. 16:31:33
3 That's why we're walking through these, but -- 16:31:36

4 A Right. 16:31:38

R 5 Q -- all right. Let me direct you to 16:31:38
6 page 33, which is the following page. And this is 16:31:40
7 Bates number 11272. 16:31:47

8 A Which -- which page? I'm sorry. 16:32:04
9 Thirty-three, you said? 16:32:06

10 Q Correct. 16:32:07

11 A Okay, I'm on 33. 16:32:18

R 12 Q And 33 are texts between -- strike that -- 16:32:20
13 texts from Johnny to you on May 27th, 2014; isn't 16:32:26
14 that right? 16:32:30

15 A Yes. 16:32:35

16 MS. VASQUEZ: Objection; vague. 16:32:35

17 BY MR. TREECE: 16:32:36

18 Q And with respect to the -- the first text, 16:32:37

19 he says to you, She finally sent me a text. I 16:32:39

20 will not respond, at least not in text and not 16:32:42

21 right away. She seems to have it all figured out. 16:32:45

22 Happy reading. Do you see that? 16:32:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

143

1 A Yes.

16:32:51

IU; R; H;
IR; MS;
AR; SP;
VA; AF

2 Q And then Johnny provides a copy of Amber's
3 text to him for you to read, correct?

16:32:52

16:32:56

4 MS. VASQUEZ: Objection; calls for
5 speculation, misstates the document, assumes
6 facts, lack of foundation, calls for hearsay.

16:32:59

16:33:00

16:33:06

IU; R; H;
IR; MS;
AR; SP;
VA; AF

7 MS. HICKOX: Join.

16:33:09

8 THE WITNESS: I haven't read it.

16:33:11

9 BY MR. TREECE:

16:33:13

IU; R; H;
IR; MS;
AR; SP;
VA; AF

10 Q All right. So let's -- let's walk through
11 it then. It says, There are so many things to
12 say. I feel like there aren't enough words in the
13 world to articulate what I want to say to you.
14 All I can say is that I am heartbroken. My whole
15 world came crashing down on me. I feel so lost.
16 But I know this: I love you more than I've ever
17 loved anything. I know that you're my one, my
18 life's true love. The fact remains: I can't
19 imagine my life without you, and the inescapable
20 truth is being with you has been the best thing to
21 happen to my life. But only you have the ability
22 to take that away from me, from both of us. I

16:33:13

16:33:16

16:33:19

16:33:21

16:33:24

16:33:27

16:33:29

16:33:32

16:33:34

16:33:38

16:33:41

16:33:43

16:33:45

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

144

IU; R; 1	know you have a sickness. I know you are	16:33:48
H; IR;		
MS; 2	suffering. Johnny, I'd do anything to be able to	16:33:51
AR;		
SP; 3	take that away from you, if only I could. And	16:33:53
VA; AF		
4	then she goes on to say, I love you. You're my	16:33:56
5	Steve. But there is this man, this other part of	16:33:59
6	you, a shadow that exists in that hole in you that	16:34:01
7	you understand is desperately -- that you	16:34:05
8	understandably try desperately to treat, fix,	16:34:08
9	fill. And that's the part, the demon, that is	16:34:11
10	killing us and that's what I'm afraid of. Do you	16:34:14
11	see that?	16:34:17
12	A Yes.	16:34:18
13	Q So Johnny was aware that Amber referred to	16:34:19
14	the part of him that was drawn to drugs and	16:34:25
15	alcohol and the -- the behavior that ensued as the	16:34:29
16	demon, correct?	16:34:32
17	MS. VASQUEZ: Objection; assumes facts,	16:34:33
18	lack of foundation, calls for hearsay, calls for	16:34:36
19	speculation.	16:34:38
20	MS. HICKOX: Join.	16:34:41
21	THE WITNESS: I don't know what all he was	16:34:48
22	aware of.	16:34:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

145

1	BY MR. TREECE:	16:34:51
IU; R; H; IR; MS; AR; SP; VA; AF	2 Q Well, she -- she sent him this text, and 3 he sent this text to you, correct?	16:34:51 16:34:53
4	A Yes.	16:34:55
5	MS. VASQUEZ: Assumes facts, calls for	16:34:56
6	hearsay, calls for speculation.	16:34:58
7	MS. HICKOX: Join.	16:34:59
8	BY MR. TREECE:	16:35:02
IU; R; H; IR; MS; AR; SP; VA; AF	9 Q And he was told in this text by Amber and 10 you were told in this text by Amber because he 11 forwarded it to you that the demon is killing us 12 and that that's what she's afraid of, correct?	16:35:02 16:35:06 16:35:09 16:35:12
13	MS. VASQUEZ: Objection; asked and	16:35:15
14	answered, calls for hearsay, assumes facts, lack	16:35:18
IU; R; H; IR; MS; AR; SP; VA; AF	15 of foundation, calls for speculation. 16 THE WITNESS: It's her descriptive word.	16:35:21 16:35:27
17	BY MR. TREECE:	16:35:29
IU; R; H; IR; MS; AR; SP; VA; AF	18 Q And she says, That demon, because despite 19 how much I've tried to fight him off you, he has 20 been winning you. I'm scared, Johnny, so scared. 21 Do you see that? 22 A Yes.	16:35:30 16:35:33 16:35:35 16:35:38 16:35:39

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

146

IU; R; 1
H; IR; 1
MS; AR; 2
SP; VA; 2
AF 3

Q And do you recall telling Ms. Heard in the text we looked at earlier on May 25th that she needed to tell Johnny she was scared?

16:35:40

16:35:43

16:35:49

4

MS. VASQUEZ: Objection; misstates the document, misstates prior testimony, calls for hearsay.

16:35:52

5

16:35:54

6

16:35:57

7

MS. HICKOX: Join.

16:35:58

IU; R;
H; IR; 8
MS; AR;
SP; VA; 9
AF

THE WITNESS: I remember that.

16:36:02

BY MR. TREECE:

16:36:03

10

Q And then here she's doing what you

16:36:04

11

advised, which is telling Johnny that she's

16:36:06

12

scared, so scared, and she's scared of the demon,

16:36:09

13

correct?

16:36:13

14

MS. VASQUEZ: Objection; calls for

16:36:13

15

speculation, calls for hearsay, double hearsay,

16:36:15

16

assumes facts.

16:36:21

17

THE WITNESS: I think she's scared of

16:36:30

18

losing the relationship.

16:36:31

19

BY MR. TREECE:

16:36:36

20

Q And then she goes on to say, He steals the

16:36:36

21

man from me and replaces him with something

16:36:38

22

terrifying and unrecognizable. Do you see that?

16:36:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

147

1	A Yes.	16:36:46
2	Q And that was conveyed to you through this	16:36:46
3	text, was it not?	16:36:49
4	MS. VASQUEZ: Objection; asked and	16:36:51
5	answered, assumes facts, calls for hearsay, calls	16:36:53
6	for speculation, vague.	16:36:55
7	THE WITNESS: They were the words she	16:37:00
8	used.	16:37:01
9	BY MR. TREECE:	16:37:01
10	Q Did you call Johnny and say, What is going	16:37:02
11	on; why -- you know, why is she saying she's	16:37:05
12	terrified of you, scared of you, calling you a	16:37:08
13	demon? Did you have any conversation with her	16:37:11
14	along those lines -- excuse me, any conversation	16:37:13
15	with him along those lines?	16:37:16
16	MS. VASQUEZ: Objection; vague, assumes	16:37:18
17	facts.	16:37:21
18	MR. TREECE: I'll give you a running on	16:37:23
19	all of them so you don't have to struggle.	16:37:25
20	BY MR. TREECE:	16:37:28
21	Q Go ahead, Ms. Dembrowski.	16:37:28
22	MS. VASQUEZ: Unintelligible. If you	16:37:30

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

148

1 understand that question. 16:37:32

2 THE WITNESS: I think the question is 16:37:34

3 confusing, but I don't recall calling my brother 16:37:39

4 on it. 16:37:44

5 BY MR. TREECE: 16:37:46

6 Q Do you recall seeing this text or any 16:37:46

7 other text where you thought, Those are alarming 16:37:48

8 statements about what's going on; I need to call 16:37:51

9 Johnny and find out what's going on? 16:37:54

0 10 MS. VASQUEZ: Objection; assumes facts, 16:37:57

11 vague and ambiguous. 16:37:59

12 THE WITNESS: No. 16:38:07

13 BY MR. TREECE: 16:38:09

14 Q Why not? 16:38:09

0 15 MS. VASQUEZ: Objection; harassing. 16:38:11

16 MS. HICKOX: Join. Also vague. 16:38:16

17 THE WITNESS: From my dealings with it and 16:38:29

18 understanding of it, Amber was very dramatic all 16:38:33

19 the time, so... 16:38:37

20 BY MR. TREECE: 16:38:44

21 Q And that's the reason you didn't reach out 16:38:44

22 to Johnny to find out what was going on? 16:38:46

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

149

1 MS. VASQUEZ: Objection; badgering. 16:38:49

2 MR. TREECE: I'll withdraw that. 16:38:53

3 BY MR. TREECE: 16:39:06

R; 4 Q I'm going to direct you to page 43. 16:39:06
MS;

P 5 A Okay. 16:39:32

6 Q And do you see the text identified as 16:39:32

7 70413 from Johnny to you? 16:39:38

8 A Yes. 16:39:44

9 Q And he says, I will fucking savage some 16:39:45

10 mother fucker, 9-21-2014? 16:39:49

11 MS. VASQUEZ: Objection; misread that. 16:39:53

R; MS; 12 THE WITNESS: Yes. 16:39:58
P

13 BY MR. TREECE: 16:40:01

14 Q Do you know why he sent you this? 16:40:02

15 MS. VASQUEZ: Objection; calls for 16:40:04

16 speculation. 16:40:05

17 MS. HICKOX: Join. 16:40:07

18 THE WITNESS: No. 16:40:09

19 BY MR. TREECE: 16:40:11

20 Q Was that an unusual text to get from your 16:40:12

21 brother? 16:40:15

22 MS. VASQUEZ: Objection; vague. 16:40:15

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

150

1 THE WITNESS: I don't -- I don't know what 16:40:27
2 the context is. Sorry. 16:40:28
3 BY MR. TREECE: 16:40:40
4 Q I'm going to direct you to page 59. 16:40:40
5 A Okay. 16:40:45
6 Okay. 16:41:27

IU; R; 7 Q And if you'll take a look in the middle of 16:41:28
H; IR; 8 page 59, which is Bates number 11298, the number 16:41:31
MS; AR; 9 is -- of the chat -- well, I guess this is of the 16:41:35
SP; VA; 10 specific message, 52720, chat 562, do you see 16:41:40
AF 11 that? 16:41:46
12 A Yeah. 16:41:47
13 Q And that's a text message -- text message 16:41:48
14 from Stephen Deuters to you, correct? 16:41:52

15 MS. VASQUEZ: Objection; assumes facts. 16:42:00
IU; R; H;

16 THE WITNESS: Yes. 16:42:02
IR; MS; AR; SP;

17 BY MR. TREECE: 16:42:03
VA; AF

IU; R; 18 Q And he says, Hi C. Not sure how much 16:42:03
H; IR; 19 you're aware of right now but I'm at the house 16:42:05
MS; AR; 20 with Kipper and Debbie, who are speaking with JD 16:42:08
SP; VA; 21 and Amber respectively, separately. Obviously 16:42:11
AF 22 things have not calmed down over the last day or 16:42:14

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

151

IU; R; 1 H; IR; SP 2	so. Do you see that?	16:42:16
2	A Yes.	16:42:17
3	Q And this is March 7th, 2015, isn't that	16:42:17
4	right, the text message?	16:42:23
5	A Yes.	16:42:24
6	Q And that's when Johnny and Amber went	16:42:25
7	all -- were in Australia; isn't that right?	16:42:28
8	MS. VASQUEZ: Objection --	16:42:30
9	MS. HICKOX: Objection.	16:42:31
10	MS. VASQUEZ: -- calls for speculation.	16:42:32
11	MS. HICKOX: Join.	16:42:35
IU; R; 12 H; IR; SP 13	THE WITNESS: Yeah, I believe that was	16:42:37
13	Australia Days.	16:42:40
14	BY MR. TREECE:	16:42:41
15	Q And do you recall Johnny cut his finger	16:42:41
16	off in Australia and there was a big to-do about	16:42:43
17	that?	16:42:47
18	MS. VASQUEZ: Objection; vague and	16:42:47
19	ambiguous, assumes facts, calls for speculation.	16:42:51
20	MS. HICKOX: Join.	16:42:56
21	MS. VASQUEZ: Lack of foundation.	16:42:57
22	BY MR. TREECE:	16:43:03

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

152

1	Q You can answer.	16:43:03
2	A His -- Johnny's finger was cut off, yes.	16:43:07
3	Q All right. And if you'll turn to page 60.	16:43:12
4	And that's Bates number 11299. Are you with me?	16:43:33
5	A Yes.	16:43:36
6	Q And then do you see there's the text chain	16:43:38
7	426 and then there's the text chain 1646, and	16:43:44
8	those are texts that you're -- you're on, correct?	16:43:51
9	So that would start at the second line from the	16:43:58
10	top and the third -- and end with the third line	16:44:00
11	from the bottom. Do you see that?	16:44:03
12	A Yes.	16:44:05
13	Q And so these are all texts that are in	16:44:07
14	March of 2015, correct?	16:44:10
15	MS. VASQUEZ: Assumes facts.	16:44:15
16	THE WITNESS: Yes.	16:44:18
17	BY MR. TREECE:	16:44:20
18	Q And you send a text with the line number	16:44:20
19	29376 to Stephen Deuters on March 8th, 2015 at	16:44:27
20	12:41 p.m. Do you see that? That's the third	16:44:35
21	line from the top.	16:44:47
22	A Yep.	16:44:48

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

153

1	Q And you say, Oh wow. Poor thing. Much	16:44:49
2	more bandaged than I thought. Makes me so sad.	16:44:51
3	And then you go on to say, If he feels okay to	16:44:55
4	then Captain Jack may need an injury. Do you see	16:45:00
5	that?	16:45:03
6	A Yes.	16:45:05
7	Q And that's referring to Johnny's finger	16:45:05
8	injury; isn't that right?	16:45:08
9	MS. VASQUEZ: Objection; calls for	16:45:10
10	speculation, vague, ambiguous.	16:45:12
11	THE WITNESS: Yes.	16:45:22
12	BY MR. TREECE:	16:45:23
13	Q All right. Are you aware that Amber	16:45:24
14	wanted Johnny to enter into a prenuptial agreement	16:45:28
15	but he wouldn't agree to do so?	16:45:32
16	MS. VASQUEZ: Objection; calls for	16:45:35
17	speculation, calls for hearsay, assumes facts.	16:45:36
18	MS. HICKOX: Join.	16:45:41
19	THE WITNESS: No.	16:45:44
20	BY MR. TREECE:	16:45:47
21	Q All right. If you'll take a look at the	16:45:47
22	fourth line from the bottom. This is the one with	16:45:52

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

154

1 the number 71428. 16:45:54

2 A Uh-huh. 16:45:59

3 Q And are you aware that Amber was willing 16:46:00

4 to agree to a postnuptial but Johnny didn't want 16:46:07

5 to agree to that? 16:46:10

6 MS. VASQUEZ: Objection; calls for 16:46:11

7 speculation, hearsay, and assumes facts. 16:46:13

8 MS. HICKOX: Join. 16:46:16

9 THE WITNESS: No. 16:46:17

10 BY MR. TREECE: 16:46:20

R; AF 11 Q And then Johnny texts you on March 8th, 16:46:20

12 2015 telling you to cancel the postnuptial, 16:46:24

13 correct? 16:46:27

14 MS. VASQUEZ: Objection; assumes facts. 16:46:28

R; AF 15 THE WITNESS: Yes, he used those words. 16:46:36

16 BY MR. TREECE: 16:46:37

17 Q And then you, in fact, called the lawyers 16:46:38

18 for Amber and Johnny and discharged them, right? 16:46:41

19 You -- you terminated their relationship with 16:46:45

20 respect to any postnuptial agreement; is that 16:46:47

21 right? 16:46:50

22 MS. VASQUEZ: Objection; vague and 16:46:51

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

156

1	facts.	16:48:04
2	MS. HICKOX: Join.	16:48:05
3	MS. VASQUEZ: Argumentative.	16:48:06
4	THE WITNESS: I don't know who Stephen	16:48:11
5	would be talking to that I would suggest that, so	16:48:13
6	I don't know.	16:48:15
IU; R; 7	BY MR. TREECE:	16:48:16
H; IR; MS; AR; 8 SP; VA;	Q But you did suggest that, didn't you?	16:48:16
AF; P 9	MS. VASQUEZ: Objection; argumentative,	16:48:18
10	badgering, asked and answered, assumes facts,	16:48:20
11	misstates the testimony and the document.	16:48:24
IU; R; 12	MS. HICKOX: Join.	16:48:27
H; IR; MS; AR; 13 SP; VA;	THE WITNESS: I did write that.	16:48:31
AF; P 14	BY MR. TREECE:	16:48:36
IU; R; 15	Q All right. I'm going to view what is	16:48:36
H; IR; MS; AR; 16 SP; VA;	marked as Exhibit 7, and I'll also pull that up on	16:48:40
AF; P 17	the share screen.	16:48:51
18	(Exhibit 7 was marked for identification	16:48:52
19	and is attached to the transcript.)	16:49:15
20	BY MR. TREECE:	16:49:15
21	Q Let me know when you're ready.	16:49:15
22	A Okay.	16:52:48

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

157

IU; R; 1 H; IR;	Q Ms. Dembrowski, this is an E-mail you	16:52:49
MS; 2 AR;	received from David Kipper on August 18th, 2014	16:52:52
SP; 3 VA;	with the subject line Update, is it not?	16:52:56
AF; P 4	A Yeah.	16:53:02
5	Q And the update there is with respect to	16:53:03
6	Dr. Kipper's treatment of -- of Johnny's drug and	16:53:07
7	alcohol abuse; isn't that right?	16:53:11
8	MS. VASQUEZ: Objection; assumes facts,	16:53:14
9	calls for hearsay, misstates the document, calls	16:53:18
10	for speculation.	16:53:21
11	MS. HICKOX: Join.	16:53:23
IU; R; 12 H; IR;	THE WITNESS: It's in reference to -- it's	16:53:33
MS; AR;13 SP; VA;	in reference to a medication, yes, that he was	16:53:40
AF; P 14	taking.	16:53:42
15	BY MR. TREECE:	16:53:44
16	Q All right. I think we're going to flesh	16:53:45
17	that out a bit.	16:53:46
IU; R; 18 H; IR;	All right. Do you recall that Dr. Kipper	16:53:47
MS; AR;19 SP; VA;	and his nurse went to the Bahamas with Amber and	16:53:51
AF; P 20	Johnny to try to curb his addictions to drug and	16:53:55
21	alcohol?	16:54:00
22	MS. VASQUEZ: Objection; assumes facts,	16:54:01

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

158

1	calls for speculation, lack of foundation.	16:54:03
IU; R; H; IR; MS; AR; SP; VA; AF; P	2 THE WITNESS: Yes, regarding the -- the 3 medication that I spoke of, yes.	16:54:11 16:54:15
4	BY MR. TREECE:	16:54:17
IU; R; H; IR; MS; AR; SP; VA; AF; P	5 Q All right. And you keep saying 6 medication. I mean, you previously sent him those 7 texts that say stop alcohol, stop coke, stop -- 8 maybe it said stop prescription, I'll have to look 9 back at it. But you previously sent him a text 10 that said stop drinking, stop coke, stop pills, 11 correct?	16:54:18 16:54:19 16:54:22 16:54:27 16:54:30 16:54:32 16:54:36
12	MS. VASQUEZ: Objection; asked and	16:54:37
13	answered, assumes facts.	16:54:39
IU; R; H; IR; MS; AR; SP; VA; AF; P	14 THE WITNESS: Yes, but I -- I need -- I 15 would need more context to know why I sent those, 16 so...	16:54:44 16:54:47 16:54:50
17	BY MR. TREECE:	16:54:50
IU; R; H; IR; MS; AR; SP; VA; AF; P	18 Q Right. But you knew he was using coke, 19 correct?	16:54:50 16:54:52
20	MS. VASQUEZ: Objection; calls for	16:54:53
21	speculation, calls for hearsay, vague.	16:54:54
IU; R; H; IR; MS; AR; SP; VA; AF; P	22 THE WITNESS: The concern was the	16:55:03

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

159

IU; R; H;
IR; MS;
AR; SP; 1
VA; AF; P
2

prescription medication.

16:55:05

BY MR. TREECE:

16:55:06

IU; R; 3
H; IR;
MS; 4
AR;
SP; 5
VA;
AF; P 6

Q All right. So if we take a look at

16:55:06

this -- this E-mail from Dr. Kipper to you with

16:55:09

the subject line Update, he says, They evidently

16:55:11

had a fight. She claims he pushed her and she

16:55:15

asked him to leave the house. Dr. Kipper informed

16:55:18

you of that, correct?

16:55:20

MS. VASQUEZ: Objection; form, calls for

16:55:21

hearsay.

16:55:27

IU; R; 11
H; IR;
MS; AR; 12
SP; VA;
AF; P 13

THE WITNESS: Dr. Kipper is telling me

16:55:32

what Amber said to him, yes.

16:55:34

BY MR. TREECE:

16:55:35

Q And that didn't surprise you, that they

16:55:35

had a fight and there was allegations that Johnny

16:55:37

pushed her and asked her to leave the house; is

16:55:40

that -- is that fair?

16:55:43

MS. VASQUEZ: Objection; calls for

16:55:44

speculation, misstates prior testimony, assumes

16:55:46

facts, calls for hearsay, argumentative.

16:55:49

MS. HICKOX: Join.

16:55:54

THE WITNESS: It wouldn't surprise me that

16:56:01

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

160

1 they had an argument. 16:56:02

2 BY MR. TREECE: 16:56:04

IU; R; 3 Q All right. And then he goes on to say, We 16:56:04
H; IR;

MS; 4 spent a long time with him discussing how he felt 16:56:07
AR;

SP; 5 and what happened, his thoughts on what sobriety 16:56:10
VA;

AF; P 6 actually meant for him and how committed he truly 16:56:13

7 was to the journey we were on. Do you see that? 16:56:16

8 A Yes. 16:56:20

9 Q And so Dr. Kipper came into the picture to 16:56:21

10 try to get Johnny sober; isn't that right? 16:56:25

11 MS. VASQUEZ: Objection; assumes facts, 16:56:27

12 calls for hearsay, calls for a conclusion -- 16:56:30

13 medical opinion and conclusion. 16:56:33

14 MS. HICKOX: Join. Also calls for 16:56:36

15 speculation. 16:56:39

16 THE WITNESS: Again, Dr. Kipper was for 16:56:50

17 the medication that he was on. 16:56:54

18 BY MR. TREECE: 16:56:56

IU; R; 19 Q All right. Well, Dr. Kipper tells you in 16:56:56
H; IR;

MS; 20 the second paragraph, He is uncomfortable, is 16:56:59
AR;

SP; 21 pessimistic that he will ever be able to stop 16:57:02
VA;

AF; P 22 doing drugs, actually romanticizes the entire drug 16:57:06

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

161

1 culture, and has no accountability for his 16:57:09
2 behaviors. Dr. Kipper told you that, did he not? 16:57:11
3 MS. VASQUEZ: Objection; assumes facts, 16:57:14
4 calls for hearsay. 16:57:15

IU; R; 5 THE WITNESS: That's what Dr. Kipper 16:57:36
H; IR; 6 wrote. I'm a little bit unclear at the moment his 16:57:38
MS; AR; 6 16:57:38
SP; VA; 7 references, but... 16:57:41
AF; P 7

8 BY MR. TREECE: 16:57:43

IU; R; 9 Q All right. And then he goes on to say on 16:57:43
H; IR; 10 the next page, this is 11488, He, referring to 16:57:47
MS; AR; 10 16:57:47
SP; VA; 11 Depp, has fundamental issues with anger. Do you 16:57:52
AF; P 11 16:57:52
12 see that? 16:57:55
13 A Yes. 16:57:56

14 Q And you understood that to be the case 16:57:57
15 yourself because he's your brother, right? 16:57:59

16 MS. VASQUEZ: Objection; misstates prior 16:58:02
17 testimony, calls for speculation, assumes facts, 16:58:05
18 lack of foundation, argumentative. 16:58:08

19 MS. HICKOX: Join. 16:58:10

20 THE WITNESS: No, I don't understand that 16:58:13
21 to be the case with my brother. 16:58:15

22 BY MR. TREECE: 16:58:17

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

162

IU; R; 1 H; IR;	Q All right. But now you have a doctor	16:58:17
MS; AR; 2 SP; VA;	telling you that Johnny has fundamental issues	16:58:19
AF; P 3	with anger, correct?	16:58:22
4	MS. VASQUEZ: Objection; misstates the	16:58:24
5	document, assumes facts, hearsay, it's vague and	16:58:26
6	ambiguous.	16:58:31
IU; R; 6 H; IR;	THE WITNESS: He -- he wrote those words,	16:58:37
MS; AR; 7		
SP; VA; 8	but...	16:58:39
AF; P		
9	BY MR. TREECE:	16:58:40
IU; R; 10	Q And -- and you hired him to help Johnny,	16:58:41
H; IR;		
MS; AR; 11	did you not?	16:58:43
SP; VA;		
AF; P 12	A I did. Well, I helped with that.	16:58:44
13	Q And so he's giving you an update and he's	16:58:48
14	telling you, Look, he's got problems with drugs,	16:58:51
15	he has no accountability, he romanticizes the	16:58:54
16	entire drug culture, and he has fundamental issues	16:58:57
17	with anger. He provides notice to you on the job	16:59:00
18	you hired him to do of what his views of Johnny's	16:59:04
19	issues are in this update; isn't that right?	16:59:08
20	MS. VASQUEZ: Objection; misstates the	16:59:11
21	document, compound, calls for hearsay, calls for a	16:59:13
22	medical opinion, calls for speculation.	16:59:19

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

163

1	MS. HICKOX: Join.	16:59:22
2	THE WITNESS: Excuse me.	16:59:29
3	He does write those things, but it becomes	16:59:30
4	more clear in conversation, you know, better --	16:59:41
5	you know, more clear description on the issues.	16:59:45
6	BY MR. TREECE:	16:59:50
7	Q So what -- what conversation are you -- do	16:59:50
8	you actually -- even though you didn't recall any	16:59:52
9	prior conversation, do now you recall a specific	16:59:54
10	conversation with Kipper?	16:59:56
11	MS. VASQUEZ: Objection; argumentative,	16:59:58
12	badgering, misstates her prior testimony.	17:00:00
13	MS. HICKOX: Join.	17:00:06
14	THE WITNESS: I'm not saying I recall a	17:00:07
15	specific conversation with Kipper.	17:00:08
16	BY MR. TREECE:	17:00:12
17	Q All right. And then on 1148 Dr. Kipper	17:00:12
18	goes on to say, There's also an issue of patience.	17:00:16
19	He is driven almost reflectively by his id, is	17:00:19
20	quite childlike in his reactions when he does not	17:00:25
21	get immediate satisfaction. Do you see that?	17:00:27
22	A Yes.	17:00:39

1 Q And would you agree with that characterization, that Johnny is driven by 17:00:40
2 characterization, that Johnny is driven by 17:00:43
3 immediate satisfaction and instant gratification? 17:00:46
4 MS. VASQUEZ Objection; vague, calls for 17:00:49
5 a medical opinion. Calls for speculation. 17:00:51
6 THE WITNESS I wouldn't say that as an 17:01:00
7 overall description of him myself, no. 17:01:03
8 BY MR. TREECE: 17:01:07
9 Q Do you know the difference between id, 17:01:07
10 ego, and superego? And I'm asking because he 17:01:09
11 communicated reflexively by his id to you in 17:01:14
12 this -- in this email exchange. 17:01:17
13 MS. VASQUEZ Objection; vague, ambiguous. 17:01:19
14 THE WITNESS I don't understand. I'm 17:01:29
15 sorry. 17:01:30
16 BY MR. TREECE: 17:01:30
17 Q Well, let me ask you this: Are you aware 17:01:31
18 that id in Freudian terms refers to, you know, 17:01:32
19 animalistic, hedonistic behaviors? 17:01:38
20 MS. VASQUEZ Objection; vague and 17:01:41
21 ambiguous, assumed facts. 17:01:43
22 MS. HICKOX Join. 17:01:47

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

165

1	BY MR. TREECE:	17:02:03
2	Q You still need to answer.	17:02:04
3	A Oh, I'm sorry.	17:02:05
4	MS. VASQUEZ: If you understand the	17:02:06
5	question, Ms. Dembrowski.	17:02:07
6	THE WITNESS: I -- I don't really	17:02:09
7	understand the question or the relevance of it,	17:02:11
8	so...	17:02:13
9	BY MR. TREECE:	17:02:13
10	Q Do you know what id refers to in the -- in	17:02:13
11	the way Dr. Kipper used it in the E-mail to you?	17:02:17
12	MS. VASQUEZ: Objection; calls for	17:02:19
13	speculation, unintelligible.	17:02:21
14	THE WITNESS: No, not really.	17:02:37
15	BY MR. TREECE:	17:02:39
16	Q All right. I'm going to show you what is	17:02:40
17	marked as Exhibit 8.	17:02:42
18	MS. HICKOX: Counsel, we've been going for	17:02:46
19	about hour, hour and 15, if you wouldn't mind	17:02:48
20	taking another break.	17:02:51
21	MR. TREECE: Sure.	17:02:52
22	THE VIDEOGRAPHER: Ms. Vasquez, agreed?	17:02:52

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

166

1 MS. VASQUEZ: Fine. Thank you, Drew, for 17:02:55
2 asking. 17:02:57
3 THE VIDEOGRAPHER: Yes, ma'am. Off 17:02:57
4 record, 5:02. 17:02:58
5 (A recess was taken.) 17:03:00
6 THE VIDEOGRAPHER: On record, 5:18. 17:18:37
7 BY MR. TREECE: 17:18:41
8 Q Ms. Dembrowski, do you have personal 17:18:42
9 knowledge of any -- any act of physical violence 17:18:43
10 between Amber or Johnny? 17:18:47
O 11 MS. VASQUEZ: Objection; assumes facts, 17:18:49
12 compound. 17:18:51
13 THE WITNESS: No. 17:18:55
14 BY MR. TREECE: 17:18:57
15 Q Do you have personal knowledge of any 17:18:57
16 emotional abuse, any act of emotional abuse 17:18:59
17 between Amber and Johnny? 17:19:03
O 18 MS. VASQUEZ: Objection; assumes facts, 17:19:04
19 vague. 17:19:07
20 MS. HICKOX: Calls for speculation, expert 17:19:10
21 opinion. 17:19:12
22 THE WITNESS: Personal knowledge, no. 17:19:17

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

167

1	BY MR. TREECE:	17:19:19
2	Q All right. I'm going to show you what	17:19:19
3	we'll mark as Exhibit 8, and then I'm going to	17:19:21
4	share it on the screen.	17:19:34
5	(Exhibit 8 was marked for identification	17:19:35
6	and is attached to the transcript.)	17:19:50
7	BY MR. TREECE:	17:19:50
8	Q Are you with me?	17:19:50
9	A Yes. I'm just trying to --	17:19:51
10	Q It's a one-page invoice that I want to ask	17:19:54
11	you about with reference to Dr. Kipper. Well --	17:19:57
12	MS. HICKOX: It appears to be two pages.	17:20:01
13	BY MR. TREECE:	17:20:01
14	Q -- one and a half.	17:20:01
15	MR. TREECE: Yeah, Ms. Hickox is correct.	17:20:04
16	MS. VASQUEZ: Also misstates the document.	17:20:07
17	It's not an invoice.	17:20:09
18	MR. TREECE: We'll clear that up with	17:20:11
19	testimony.	17:20:13
20	BY MR. TREECE:	17:20:17
21	Q All right. Ms. Dembrowski, you indicated	17:20:18
22	that you were involved in bringing Dr. Kipper on.	17:20:21

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

168

1	Were you involved in making sure that he was paid?	17:20:26
2	MS. VASQUEZ: Objection; misstates the	17:20:31
3	prior testimony.	17:20:33
4	THE WITNESS: No.	17:20:37
5	BY MR. TREECE:	17:20:37
6	Q Are you aware that he was paid for the	17:20:37
7	period of January 1st, 2014 to December 31st, 2016	17:20:41
8	on the order of \$2.3 million?	17:20:49
9	A No.	17:20:53
10	MS. VASQUEZ: Objection; assumes facts --	17:20:54
11	THE WITNESS: Sorry.	17:20:56
12	MS. VASQUEZ: -- lack of foundation, calls	17:20:57
13	for speculation.	17:20:59
14	MS. HICKOX: Join.	17:20:59
15	BY MR. TREECE:	17:21:02
16	Q I'm going to show you what we'll mark as	17:21:02
17	Exhibit 11. I realize we're skipping a little	17:21:05
18	bit, but that's not a problem.	17:21:08
19	(Exhibit 11 was marked for identification	17:21:19
20	and is attached to the transcript.)	17:21:38
21	BY MR. TREECE:	17:21:38
22	Q Ms. Dembrowski, do you have Exhibit 11 in	17:21:38

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

169

1 front of you? 17:21:40

2 A Is it -- is it just one page? I'm trying 17:21:43

3 to get to -- 17:21:46

4 Q It's one page and then the E-mail messages 17:21:47

5 start on the very top of the second page. 17:21:51

6 A Okay. 17:21:58

R; 7 Q Is Exhibit 11 E-mails between you and 17:22:00
F/A;

FSPK; 8 Tracey Jacobs related to Pirates of the Caribbean 17:22:04
H

9 5 on February 26th, 2015? 17:22:09

10 MS. HICKOX: Ms. Dembrowski, please just 17:22:14

11 read the document, too, before you answer. 17:22:15

12 THE WITNESS: I will. 17:22:19

13 BY MR. TREECE: 17:22:50

14 Q And it's short, and I'm going to go 17:22:51

15 through it with me. So are you with me now? 17:22:53

R; F/A; 16 A Yes, I'm just reading it. 17:22:55
FSPK; H

17 Q And I'm going to start you on the second 17:23:03

18 page. It's numbered 19235. Are you with me? 17:23:06

19 A Yes. 17:23:28

R; 20 Q All right. And Tracey Jacobs sends an 17:23:28
F/A;

FSPK; 21 E-mail on February 26th saying, Sean Bailey did 17:23:32
H

22 call me. And Sean Bailey's with Disney; isn't 17:23:35

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

170

R; H; IR	1	that right?	17:23:38
	2	MS. VASQUEZ: Objection; calls for	17:23:39
	3	speculation, vague.	17:23:40
R; H; IR	4	THE WITNESS: Yes.	17:23:44
	5	BY MR. TREECE:	17:23:44
	6	Q And what's Sean Bailey's role at Disney?	17:23:44
	7	MS. VASQUEZ: Calls for speculation.	17:23:48
	8	MS. HICKOX: Join.	17:23:50
	9	MS. VASQUEZ: Vague.	17:23:51
	10	THE WITNESS: I'm not sure of his title.	17:23:52
	11	BY MR. TREECE:	17:23:54
R; H; IR	12	Q He's pretty high up at Disney, is he not?	17:23:54
	13	MS. VASQUEZ: Objection; vague and	17:23:58
	14	ambiguous, asked and answered.	17:23:59
	15	MS. HICKOX: Join. And lacks foundation.	17:24:02
R; H; IR	16	THE WITNESS: Yes.	17:24:06
	17	BY MR. TREECE:	17:24:07
R; H; IR	18	Q And he says, There were 300 extras	17:24:08
	19	yesterday. Disney is going to give him two days	17:24:11
	20	ish to correct the lateness and then there will be	17:24:15
	21	a problem. And then there's a question of was he	17:24:17
	22	at the Foo Fighters last night. Do you see that?	17:24:20

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

171

IU; R; 1 A Yes. 17:24:23
H; IR; 1
MS; AR; 2 Q And this is in reference to Johnny being 17:24:23
SP; VA; 2
AF; P 3 late to the set and not showing up on time, 17:24:25
4 correct? 17:24:28

5 MS. VASQUEZ: Objection; assumes facts, 17:24:29
6 calls for hearsay, calls for speculation. 17:24:31
7 MS. HICKOX: Join. 17:24:35

IU; R; 8 THE WITNESS: Yes, to lateness, yes. 17:24:49

H; IR; 9 BY MR. TREECE: 17:24:51

MS; AR; 10 Q And then if you look on the first page of 17:24:51
SP; VA; 11 this exhibit, the second E-mail from the bottom 17:24:54
AF; P 12 Tracey Jacobs E-mails and says, It will get ugly 17:24:57
13 if the lateness doesn't change. Has anyone spoken 17:25:00
14 to him. Do you see that? 17:25:04

15 A Yes. 17:25:06

16 Q And "spoken to him" refers to spoken to 17:25:07
17 Johnny about his lateness, correct? 17:25:09

18 MS. VASQUEZ: Objection; calls for 17:25:11
19 speculation, calls for hearsay. 17:25:12

IU; R; 20 THE WITNESS: Yes. 17:25:27
H; IR; 20

MS; AR; 21 BY MR. TREECE: 17:25:28

SP; VA; 22 Q And then above that you respond and you 17:25:28
AF; P 22

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

172

IU; R; 1 say to Tracey, Anyone as in who? Jerry did last 17:25:32
H; IR; 2 week when he was super late. He himself said he 17:25:36
MS; 3 needs to get turned around. Do you see that? 17:25:39
AR; 4
SP; P A Yes. 17:25:41
VA; 17:25:41
AP; P 17:25:41

5 Q And is that Jerry Bruckheimer? 17:25:43

6 MS. VASQUEZ: Objection; calls for 17:25:46

7 speculation. 17:25:47

8 THE WITNESS: I'm not sure. 17:25:51

9 BY MR. TREECE: 17:25:53

IU; R; 10 Q And what's Jerry Bruckheimer's role with 17:25:53
H; IR; 11 respect to Pirates of the Caribbean 5, if you 17:25:59
MS; 12 know? 17:26:01
AR; 13
SP; P A Producer. 17:26:01
VA; 17:26:01
AP; P 17:26:01

14 Q And do you recall that the producer called 17:26:02

15 Johnny to address concerns with his lateness? 17:26:06

16 MS. VASQUEZ: Objection; calls for 17:26:10

17 speculation, hearsay, assumes facts. 17:26:11

18 THE WITNESS: I -- I don't recall or know 17:26:18

19 if Jerry did. I wasn't there. 17:26:22

20 BY MR. TREECE: 17:26:25

21 Q Well, you were aware that he was having 17:26:25

22 issues with being late and acknowledged himself 17:26:27

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

173

1 that he needs to get turned around? 17:26:30

2 MS. VASQUEZ: Objection; vague and 17:26:33

3 ambiguous, assumes facts, calls for speculation. 17:26:35

4 THE WITNESS: It doesn't read that clearly 17:26:55

5 to me in terms of what you're saying. 17:26:56

6 BY MR. TREECE: 17:26:59

7 Q Your E-mail says, He himself said he needs 17:27:00

8 to get turned around. And that's in reference to 17:27:03

9 lateness, correct, and improving and not being 17:27:09

10 late -- 17:27:11

11 MS. VASQUEZ: Objection; compound -- 17:27:12

12 BY MR. TREECE: 17:27:13

13 Q -- correct? 17:27:14

14 MS. VASQUEZ: Objection; compound, asked 17:27:14

15 and answered, assumes facts, document speaks for 17:27:16

16 itself. 17:27:20

17 THE WITNESS: It does say that. I 17:27:23

18 don't -- but I don't know who he himself is, 17:27:25

19 whether that's Johnny saying that or Jerry saying 17:27:28

20 that. 17:27:32

21 BY MR. TREECE: 17:27:34

22 Q All right. I'm going to show you what 17:27:34

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

174

1 we've marked as 12. 17:27:36

2 (Exhibit 12 was marked for identification 17:27:49

3 and is attached to the transcript.) 17:27:50

4 BY MR. TREECE: 17:27:50

5 Q And this is substantively one page. 17:27:50

6 There's a little bit of a carryover with just the 17:27:52

7 kind of template message that follows E-mails on 17:27:58

8 the second page, but the content is largely on the 17:28:00

9 first page. And let me know when you're with me. 17:28:03

10 A Okay. 17:28:08

IU; R; 11 Q All right. If you'll take a look at the 17:28:46

H; IR; 12 bottom of Exhibit 12, do you see the E-mail from 17:28:48

MS; 13 Sean Bailey to Tracey Jacobs on February 27th, 17:28:51

AR; 14 2015, subject Johnny PS? 17:28:54

SP; 15 A Yeah. 17:29:02

VA; 16 Q And Sean says with respect to Pirates of 17:29:04

AF; P 17 the Caribbean and Johnny, Eight hours late 17:29:08

18 yesterday. We are a day behind on schedule. I've 17:29:10

19 LW for Christi. Thanks. Do you see that? 17:29:14

20 A Yes. 17:29:17

21 Q And then you respond on the 27th right 17:29:18

22 above that and say, Yeah, I will call him. Do you 17:29:21

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

175

IU; R;
H; IR; 1 see that? 17:29:25
MS; AR;
SP; VA;2 A Yes. 17:29:25
AF; P

3 Q And you're referring to calling Johnny, 17:29:26
4 correct? 17:29:29

5 MS. VASQUEZ: Objection -- 17:29:31

6 THE WITNESS: No. 17:29:33

7 MS. VASQUEZ: -- calls for speculation. 17:29:33

8 BY MR. TREECE: 17:29:36

9 Q Do you know who you're talking about? 17:29:36

10 A I think I'm referring to calling Sean. 17:29:40

IU; R; 11 Q All right. And do you see above that it 17:29:43
H; IR;
MS; 12 says, Bruckheimer just called me and said if he's 17:29:45
AR;
SP; 13 not on time Monday we have a real problem. I 17:29:50
VA;
AF; P 14 don't know what to do. And that's Tracey Jacobs 17:29:52
15 saying that to you; is that right? 17:29:55

16 A Yes. 17:30:00

17 Q So Jerry refers to Jerry Bruckheimer, 17:30:01

18 correct? 17:30:05

19 MS. VASQUEZ: Objection; calls for 17:30:05

20 speculation. 17:30:07

IU; R;
H; IR; 21 THE WITNESS: In -- in -- in this 17:30:13
MS; AR;
SP; VA;22 particular text Jerry -- the Jerry seems to refer 17:30:17
AF; P

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

176

IU; R; H;
IR; MS; 1

to Jerry Bruckheimer.

17:30:25

AR; SP; 2
VA; AF; P

BY MR. TREECE:

17:30:27

3

Q All right. And then the E-mail right

17:30:27

4

above that at 12:40 p.m. from Tracey, Jerry says

17:30:30

IU; R;
H; IR; 5

he's been late every day at least two hours. He

17:30:34

MS; AR; 6
SP; VA;

also referenced his lateness on Alice 2 and

17:30:38

AF; P 7

Mortdecai, which clearly is out there. Do you see

17:30:44

8

that?

17:30:46

9

A Yes.

17:31:01

10

Q All right. And then you respond at the

17:31:03

11

top and you say, I know all of it and what he

17:31:07

12

needs to do. I think he knows also. Working on

17:31:10

13

how to get him there. Do you see that?

17:31:13

14

A No, I don't actually see that, so...

17:31:30

15

Q All right. So at the very top right below

17:31:32

16

the -- the first E-mail at the top, it's from your

17:31:35

17

Infinitum Nihil address on February 27th at

17:31:42

18

12:50 p.m.

17:31:45

19

A Okay.

17:31:45

20

Q Starts in the second paragraph there. Do

17:31:46

21

you see that?

17:31:53

22

A Yes.

17:31:55

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

177

1	Q And you're talking about you know what	17:31:56
2	Johnny needs to do and you're working to get him	17:31:59
3	there. And the issues that you're referring to	17:32:02
4	are his drug and alcohol abuse, and they're	17:32:04
5	affecting his ability to show up on time; isn't	17:32:08
6	that right?	17:32:10
7	MS. VASQUEZ: Objection; assumes facts,	17:32:11
8	lack of foundation, misstates the testimony, calls	17:32:13
9	for speculation, compound, calls for hearsay.	17:32:16
10	MS. HICKOX: Join.	17:32:20
11	THE WITNESS: No, I'm just referring to	17:32:23
12	getting him there on time.	17:32:25
13	BY MR. TREECE:	17:32:26
14	Q Do you know why he's been late so many	17:32:26
15	times, why that's an issue?	17:32:29
16	MS. VASQUEZ: Objection; calls for	17:32:31
17	speculation on its face.	17:32:33
18	THE WITNESS: I wasn't in Australia to	17:32:38
19	know exactly why he was late.	17:32:44
20	BY MR. TREECE:	17:32:46
21	Q I'm going to show you what's marked as	17:32:46
22	Exhibit 13.	17:32:49

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

178

1 (Exhibit 13 was marked for identification 17:32:56
2 and is attached to the transcript.) 17:33:11
3 BY MR. TREECE: 17:33:11
4 Q And if you'll take a look at Exhibit 13, 17:33:11
5 it's just the one E-mail -- well, two E-mails, but 17:33:13
6 the one at the top doesn't have any content in it. 17:33:16
7 Do you see the E-mail in the middle from John 17:33:19
8 Leshner April 14th, 2015 to Tracey Jacobs, Scott 17:33:22
9 cooper, subject Ummm? Do you see that? 17:33:28
10 A Yes. 17:33:31
IU; R; 11 Q And then Tracey sent this E-mail to you on 17:33:32
H; IR; 12 April 15th, 2015, correct? 17:33:34
MS; 13 A Yes. 17:33:38
AR; 14 Q And it says, I called you. He didn't show 17:33:39
SP; 15 up. Very upsetting. Hopefully he will be there 17:33:42
VA; 16 tomorrow. We have to pay for the stage time even 17:33:46
AF; P 17 if he doesn't come. Do you see that? 17:33:48
18 A Yes. 17:33:50
19 Q And that's referring to Johnny not showing 17:33:51
20 up on set when he's supposed to, correct? 17:33:54
21 MS. VASQUEZ: Objection; calls for 17:33:58
22 speculation, assumes facts, hearsay. 17:33:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

179

1	MS. HICKOX: Join.	17:34:03
2	THE WITNESS: Typically stage time would	17:34:06
3	be referencing doing ADR, which we sometimes would	17:34:08
4	set up in between working. So we had a couple of	17:34:13
5	different options.	17:34:18
6	BY MR. TREECE:	17:34:20
7	Q All right. And Johnny didn't show up for	17:34:21
8	that, right?	17:34:23
9	MS. VASQUEZ: Objection; calls for	17:34:26
10	speculation.	17:34:28
11	THE WITNESS: It says that he didn't -- he	17:34:33
12	didn't go on that day but hopefully he will be	17:34:36
13	there tomorrow. We set it for two days,	17:34:38
14	apparently.	17:34:41
15	BY MR. TREECE:	17:34:41
16	Q And it was very upsetting that he didn't	17:34:42
17	show up; isn't that what was conveyed by John	17:34:44
18	Lesher?	17:34:47
19	MS. VASQUEZ: Objection; calls for	17:34:48
20	speculation, misstates the document, assumes	17:34:50
21	facts.	17:34:54
22	THE WITNESS: It -- it does say that, but	17:34:59

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

180

1	you would have to know more context to it.	17:35:02
2	BY MR. TREECE:	17:35:04
3	Q Are you aware that Johnny's career was	17:35:05
4	suffering because of his drug and alcohol use?	17:35:07
5	MS. VASQUEZ: Objection --	17:35:10
6	THE WITNESS: No.	17:35:11
7	MS. VASQUEZ: -- vague and -- sorry,	17:35:12
8	Ms. Dembrowski. I need to interpose a late	17:35:14
9	objection.	17:35:16
10	THE WITNESS: Sorry.	17:35:17
11	MS. VASQUEZ: That's okay. We're all	17:35:18
12	getting tired.	17:35:19
13	Objection; assumes facts, calls for	17:35:20
14	hearsay, assumes facts, lack of foundation, calls	17:35:24
15	for speculation.	17:35:27
16	MR. TREECE: I'll give you all of them.	17:35:29
17	BY MR. TREECE:	17:35:32
18	Q All right. Are you aware that his career	17:35:33
19	around the 2015 time frame was starting to taper	17:35:36
20	off?	17:35:40
21	MS. VASQUEZ: Objection; vague and	17:35:41
22	ambiguous, calls for speculation, assumes facts.	17:35:42

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

181

1	MS. HICKOX: Join.	17:35:46
2	THE WITNESS: I really don't understand	17:35:47
3	that question at all.	17:35:48
4	BY MR. TREECE:	17:35:50
5	Q All right. Did -- that Johnny was having	17:35:51
6	more difficulty getting work from 2015 forward?	17:35:54
7	MS. VASQUEZ: Objection; assumes facts,	17:36:01
8	calls for speculation.	17:36:03
9	MS. HICKOX: Join.	17:36:06
10	THE WITNESS: No.	17:36:08
11	BY MR. TREECE:	17:36:09
12	Q Are you aware that Johnny was in dire	17:36:10
13	financial straits in 2015?	17:36:13
14	MS. VASQUEZ: Objection; calls for a legal	17:36:17
15	conclusion, assumes facts, lack of foundation.	17:36:19
16	MS. HICKOX: Join. And also vague.	17:36:25
17	BY MR. TREECE:	17:36:31
18	Q I'm going to show you what we've marked as	17:36:31
19	Exhibit 18.	17:36:34
20	(Exhibit 18 was marked for identification	17:36:35
21	and is attached to the transcript.)	17:36:45
22	BY MR. TREECE:	17:36:45

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

182

IU; R; H; IR; 1	Q Ms. Dembrowski, if you take a look at	17:36:45
MS; AR; 2	Exhibit 18, is this an E-mail from Tracey Jacobs	17:36:48
SP; VA; 3	to -- well, copied to you saying, Did you tell	17:36:50
AF; P 4	Johnny?	17:36:54
5	A I'm sorry. I was reading.	17:37:00
6	Q Okay. No problem.	17:37:01
IU; R; 7 H; IR; MS; 8	So Exhibit 18, is this an E-mail from	17:37:02
AR; SP; 9	Tracey Jacobs where you're copied and it's on	17:37:05
VA; AF; P 10	September 2nd, 2015?	17:37:09
11	A I see the E-mail.	17:37:15
12	Q All right. And it says, Subject: Did you	17:37:16
13	tell Johnny. Do you see that?	17:37:18
14	A Yes.	17:37:22
15	Q And then it goes on to say, He needs to	17:37:23
16	make 25 million by the end of the year. What are	17:37:25
17	you doing? I'm in Europe. Do you see that?	17:37:28
18	A Yes.	17:37:30
19	Q And that's in reference to Johnny's dire	17:37:31
20	financial straits in 2015, correct?	17:37:34
21	MS. VASQUEZ: Objection; calls for	17:37:38
22	speculation, vague and ambiguous, calls for a	17:37:39
	legal conclusion, assumes facts.	17:37:41

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

183

1 MS. HICKOX: Join. 17:37:45

2 THE WITNESS: That's not my conversation. 17:37:46

3 That's between Tracey and -- 17:37:49

4 BY MR. TREECE: 17:37:52

IU; R; H; 5 Q And you're copied on that conversation -- 17:37:53

IR; MS; 6 A Yeah. 17:37:54

AR; SP; 7 Q -- about him needing to make 25 million by 17:37:55

VA; AF; P 8 the end of the year, correct? 17:37:57

9 A Yes. 17:38:01

10 Q What did you understand that to mean? 17:38:02

11 MS. VASQUEZ: Calls for speculation. 17:38:07

12 THE WITNESS: I -- I don't -- I don't 17:38:11

13 recall what it means, to be honest. 17:38:17

14 BY MR. TREECE: 17:38:21

IU; R; H; IR; 15 Q All right. I'm going to show you what is 17:38:21

MS; AR; SP; VA; 16 marked as Exhibit 19. 17:38:24

AF; P 17 (Exhibit 19 was marked for identification 17:38:26

18 and is attached to the transcript.) 17:38:58

19 BY MR. TREECE: 17:38:58

IU; R; H; IR; 20 Q Ms. Dembrowski, Exhibit 19, is this an 17:38:59

MS; AR; SP; VA; 21 E-mail from Tracey Jacobs to you and others 17:39:02

AF; P 22 dated -- or and another person dated 17:39:06

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

184

IU; R; H;
IR; MS; 1
AR; SP;
VA; AF; 2P

September 10th, 2015?

17:39:09

A Yes.

17:39:25

3 Q And are you aware that Johnny was in the
4 process of trying to procure a loan to stabilize
5 his finances in or around this time?

17:39:25

17:39:28

17:39:31

6 MS. VASQUEZ: Objection; assumes facts,
7 calls for speculation, vague and ambiguous.

17:39:34

17:39:37

8 THE WITNESS: I don't recall.

17:39:42

9 BY MR. TREECE:

17:39:44

10 Q Are you aware that he had discussions with
11 Bank of America about selling back-ends or there
12 were discussions about selling back-end rights to
13 drum up money for Johnny?

17:39:44

17:39:47

17:39:51

17:39:55

14 MS. VASQUEZ: Objection; calls for
15 speculation, assumes facts, lack of foundation,
16 calls for hearsay.

17:39:57

17:39:59

17:40:03

17 THE WITNESS: I -- I don't recall all
18 conversations.

17:40:06

17:40:08

19 BY MR. TREECE:

17:40:09

20 Q Are you aware that he was having his art
21 collection appraised to try to raise money?

17:40:09

17:40:11

22 MS. HICKOX: Objection; calls for

17:40:23

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

185

1 speculation, lacks foundation, assumes facts. 17:40:24

2 THE WITNESS: I don't recall specifically 17:40:31

3 why he was having his art collection appraised. 17:40:32

4 BY MR. TREECE: 17:40:41

IU; R; H; 5 Q I'm going to -- I'm going to show you what 17:40:41
IR; MS; 5

AR; SP; 6 we've marked as Exhibit 20. 17:40:44
VA; AF; P 6

7 (Exhibit 20 was marked for identification 17:40:46

8 and is attached to the transcript.) 17:41:29

9 BY MR. TREECE: 17:41:29

10 Q Ms. Dembrowski, Exhibit 20, are these 17:41:29

IU; R; 11 E-mails from Tracey Jacobs to you on or around -- 17:41:31
H; IR; 11

MS; AR; 12 well, strike that, on February 12, 2016? 17:41:34
SP; VA; 12

AF; P 13 MS. HICKOX: Objection to the extent it 17:41:43

14 misstates the document. 17:41:45

IU; R; 15 MS. VASQUEZ: Join. 17:41:48
H; IR; 15

MS; AR; 16 THE WITNESS: Yes. 17:41:50
SP; VA; 16

AF; P 17 BY MR. TREECE: 17:41:53

IU; R; 18 Q And if you look at the E-mail at the 17:41:53
H; IR; 18

MS; AR; 19 bottom from Tracey Jacobs to you, February 12th, 17:41:55
SP; VA; 19

AF; P 20 2016, it says -- to you and Joel and others, Joel, 17:42:02

21 you really need to speak to him Tuesday to explain 17:42:05

22 that -- the need for him to do a film, even if not 17:42:08

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

186

IU; R; 1	this one. I spoke to the music manager who told	17:42:12
H; IR; 2	me Johnny may gross 100 grand a week for a couple	17:42:15
MS; 3	of weeks max. Do you see that?	17:42:19
AR; 4		
SP; 4	A Yes.	17:42:21
VA; 5	Q And so this is a reflection again of the	17:42:21
AF; P 6	dire financial straits that Johnny was in and the	17:42:25
	need for him to not do the music work that is	17:42:28
	consuming his time? He needed to do a film, even	17:42:31
	if it's not the one that was under consideration,	17:42:34
	correct?	17:42:37
	MS. VASQUEZ: Objection; calls for	17:42:37
	speculation, misstates the document, calls for	17:42:38
	hearsay, assumes facts.	17:42:46
	MS. HICKOX: Join. It's also vague and	17:42:49
	compound.	17:42:51
	THE WITNESS: I wouldn't characterize this	17:42:55
	as that, no.	17:42:57
	BY MR. TREECE:	17:42:58
	Q What would you characterize it as?	17:42:58
	A I would characterize it more as Tracey	17:43:03
	wanted him to do bigger -- bigger films as opposed	17:43:05
	to just the music.	17:43:15

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

187

1	Q Because he needed money, correct?	17:43:16
2	MS. VASQUEZ: Objection; assumes facts,	17:43:18
3	calls for a legal conclusion, calls for	17:43:20
4	speculation.	17:43:22
5	MS. HICKOX: Join.	17:43:23
6	THE WITNESS: Again, I wouldn't	17:43:28
7	characterize this as even that, no.	17:43:29
8	BY MR. TREECE:	17:43:34
9	Q I'm showing you now what is marked as	17:43:34
10	Exhibit 21.	17:43:37
11	(Exhibit 21 was marked for identification	17:43:39
12	and is attached to the transcript.)	17:43:39
13	BY MR. TREECE:	17:43:39
14	Q And this is just a single two-sentence	17:43:39
15	E-mail. Is this an E-mail from Tracey Jacobs to	17:43:44
16	Joel, subject line The tour, dated March 7th,	17:43:51
17	2016?	17:43:56
18	MS. VASQUEZ: Objection; calls for	17:43:56
19	speculation. The witness is not copied on this	17:43:58
20	E-mail.	17:44:00
21	THE WITNESS: I'm sorry. I was reading	17:44:09
22	it, so would you mind repeating your question?	17:44:11

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

188

1 BY MR. TREECE: 17:44:13

2 Q Yeah. I'll just ask you this: Do you see 17:44:14

3 where it says, Christi just told me J is doing the 17:44:17

4 tour until August? Did you ever E-mail or text 17:44:20

5 him? This flies in the face of what we discussed 17:44:23

6 last week. Do you see that? 17:44:26

7 A I do see that. 17:44:28

8 Q Do you remember discussions about making 17:44:29

9 sure Johnny doesn't do a tour with the band 17:44:30

10 because he needed money and needed to be doing 17:44:33

11 films? 17:44:35

12 MS. VASQUEZ: Objection; assumes facts, 17:44:35

13 compound, vague and ambiguous, calls for hearsay. 17:44:37

14 MS. HICKOX: Join. 17:44:43

15 THE WITNESS: I don't recall a 17:44:48

16 conversation being that -- for that specifically, 17:44:51

17 no. 17:44:54

18 BY MR. TREECE: 17:45:07

R 19 Q All right. I'm showing you now what's 17:45:08

20 been marked as Exhibit 22. 17:45:10

21 (Exhibit 22 was marked for identification 17:45:11

22 and is attached to the transcript.) 17:45:12

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

189

1 BY MR. TREECE: 17:45:12

IU; R; 2 Q Is this an E-mail from Tracey Jacobs 17:45:12
H; IR;
MS; AR; 3 with -- March 9th, 2016 with a copy to you, 17:45:16
SP; VA;
AF; P 4 subject line Turkish air? 17:45:19

5 MS. HICKOX: Objection to the extent it 17:45:25

6 misstates the document in that other people are 17:45:26

7 also cc'd. 17:45:30

IU; R; 8 MS. VASQUEZ: Join. 17:45:31
H; IR;

MS; AR; 9 THE WITNESS: I'm copied on this, yes. 17:45:41
SP; VA;

AF; P 10 BY MR. TREECE: 17:45:42

IU; R; 11 Q And it says, We must get redline contract 17:45:43
H; IR;
MS; AR; 12 so Christi can get Johnny and we can have to get 17:45:45
SP; VA; 13 signed ASAP. We need to get the 4 million 17:45:49
AF; P 14 immediately. Please, with a number of expla -- 17:45:52
15 exclamation marks behind it. 17:45:56

16 A I see that. 17:46:00

17 Q And why did Johnny need the 4 million 17:46:01

18 immediately? 17:46:06

19 MS. VASQUEZ: Objection; calls for 17:46:07

20 speculation, assumes facts, calls for hearsay. 17:46:08

21 MS. HICKOX: Join. 17:46:11

22 THE WITNESS: Tracey's trying to get the 4 17:46:19

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

190

1	million immediately.	17:46:21
2	BY MR. TREECE:	17:46:26
3	Q All right. I'm going to show you what's	17:46:27
4	marked as Exhibit 23.	17:46:31
5	(Exhibit 23 was marked for identification	17:46:33
6	and is attached to the transcript.)	17:46:33
7	BY MR. TREECE:	17:46:33
8	Q Ms. Dembrowski, if you take a look at	17:47:15
9	Exhibit 23, is the top of this an E-mail from	17:47:19
10	Tracey Jacobs to you forward The Ginger Man on	17:47:22
11	March 24th, 2016 where Tracey says, How do you	17:47:26
12	want to deal with this? I don't want to get	17:47:30
13	involved with the bank?	17:47:32
14	A I see that.	17:47:34
15	Q And then below that, the E-mail below that	17:47:35
16	she's forwarding says, Bank of California were	17:47:38
17	talking about a loan against personal security	17:47:42
18	from Johnny, which obviously we can't allow. Do	17:47:44
19	you see that?	17:47:46
20	A Yes.	17:47:47
21	Q Why was Johnny needing a loan and --	17:47:47
22	strike that.	17:47:53

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

191

1 Why was Johnny needing a loan in 2016? 17:47:53

2 MS. VASQUEZ: Objection; calls for 17:47:56

3 speculation, assumes facts, asked and answered. 17:47:58

4 MS. HICKOX: Join. 17:48:04

5 THE WITNESS: This isn't a loan for 17:48:06

6 Johnny. This is a loan for a project. 17:48:07

7 BY MR. TREECE: 17:48:09

8 Q What project is that? 17:48:09

9 A The Ginger Man. 17:48:11

10 Q And did you get involved with the bank for 17:48:16

11 that project? 17:48:19

12 MS. VASQUEZ: Objection; vague. 17:48:21

13 THE WITNESS: No. This is when we were 17:48:25

14 trying to -- we were trying to fund the filming, 17:48:27

15 and this was a suggestion that wasn't going to 17:48:32

16 work out. 17:48:35

17 BY MR. TREECE: 17:48:38

18 Q I asked you earlier about Keenan Wyatt. 17:48:39

19 Do you know Mr. Wyatt? 17:48:41

20 A Yes. 17:48:43

21 Q How -- what is his -- how do you know him? 17:48:45

22 A I've known him. He's worked with us for 17:48:50

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

192

R; P; FSPK; 1 SP; VA;	many years.	17:48:55
AR; AF; 2 H	Q And he works with Johnny?	17:48:55
3	MS. VASQUEZ: Objection; vague and	17:48:57
4	ambiguous, calls for speculation.	17:48:58
5	MS. HICKOX: Join.	17:49:02
6	THE WITNESS: Yes.	17:49:03
7	BY MR. TREECE:	17:49:03
R; P; FSPK; SP; VA; AR; AF; H	Q And are you aware that Keenan would read Johnny's lines to him through an earpiece?	17:49:03 17:49:07
10	MS. VASQUEZ: Objection; calls for	17:49:11
11	speculation, assumes facts, hearsay.	17:49:12
12	MS. HICKOX: Join.	17:49:16
R; P; FSPK; SP; VA; AR; AF; H	THE WITNESS: Keenan played music.	17:49:19
14	BY MR. TREECE:	17:49:23
R; P; FSPK; SP; VA; AR; AF; H	Q That's not my question. Are you aware that Keenan would read Johnny's lines when he was on set to him through an earpiece?	17:49:23 17:49:25 17:49:29
18	MS. VASQUEZ: Asked and answered,	17:49:32
19	badgering.	17:49:34
20	MR. TREECE: Not answered, but...	17:49:38
21	BY MR. TREECE:	17:49:40
22	Q So you can answer.	17:49:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

193

1 MS. VASQUEZ: Asked and answered. 17:49:42

R; P; 2 THE WITNESS: Keenan -- Keenan played 17:49:46
FSPK;

SP; 3 music through the earpiece. If Johnny needed a -- 17:49:48
VA;

AR; 4 a reminder of anything, he could ask. 17:49:52
AF; H

5 BY MR. TREECE: 17:49:55

6 Q And Johnny did ask and Keenan did read 17:49:56

7 lines, correct? 17:49:58

8 MS. VASQUEZ: Objection; vague, ambiguous, 17:50:00

9 calls for speculation, asked and answered. 17:50:04

10 THE WITNESS: I'm not part of their 17:50:09

11 day-to-day working together, so... 17:50:10

12 BY MR. TREECE: 17:50:14

13 Q Have you ever been asked to pay for 17:50:15

14 property damage caused by Johnny when he was on a 17:50:18

15 job or project or staying elsewhere? 17:50:23

16 MS. VASQUEZ: Objection; vague and 17:50:27

17 ambiguous, assumes facts, lack of foundation, 17:50:28

18 unintelligible. 17:50:31

19 MS. HICKOX: Join. And also compound. 17:50:32

20 THE WITNESS: I'm sorry? 17:50:40

21 BY MR. TREECE: 17:50:41

22 Q I'll rephrase it. Have you ever been 17:50:41

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

194

1 responsible for paying for property damage that 17:50:44
2 Johnny caused, paying a third party for property 17:50:46
3 damage that Johnny caused? 17:50:50
4 MS. VASQUEZ: Same objections. 17:50:52
5 THE WITNESS: I don't recall specifically 17:50:55
6 being in charge of paying for property damage that 17:50:59
7 Johnny caused. 17:51:02
8 BY MR. TREECE: 17:51:04
R; VA; 9 Q Are you aware of payments for property 17:51:04
AF; SP 10 damage caused in Australia? 17:51:07
11 MS. VASQUEZ: Objection; vague and 17:51:10
12 ambiguous, assumes facts, calls for speculation. 17:51:11
13 MS. HICKOX: Join. 17:51:17
R; VA; 14 THE WITNESS: I'm aware that there was 17:51:21
AF; SP 15 some damage. 17:51:22
16 BY MR. TREECE: 17:51:24
17 Q And are you -- who paid for that damage? 17:51:24
18 MS. VASQUEZ: Objection; calls for 17:51:27
19 speculation, assumes facts. 17:51:29
20 MS. HICKOX: Join. 17:51:31
21 THE WITNESS: I didn't pay for it. I 17:51:39
22 don't -- I don't -- I wasn't involved in the 17:51:44

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

195

1	payment, so I don't know.	17:51:46
2	BY MR. TREECE:	17:51:48
3	Q Are you aware of payments for property	17:51:48
4	damage caused in Hicksville at the trailer park?	17:51:50
5	MS. VASQUEZ: Objection; assumes facts,	17:51:55
6	calls for speculation, vague and ambiguous.	17:51:56
7	MS. HICKOX: Join.	17:52:00
8	THE WITNESS: No, I'm not.	17:52:01
9	BY MR. TREECE:	17:52:06
10	Q When is the last time you spoke with	17:52:07
11	Mr. Depp?	17:52:09
12	A I'm not -- I'm not sure.	17:52:17
13	Q How often do you speak with him typically,	17:52:21
14	if you can give me sort of a general sense?	17:52:24
15	MS. VASQUEZ: Objection; vague as to time.	17:52:27
16	THE WITNESS: We -- we speak occasionally	17:52:31
17	and we, you know, text to keep in touch with, you	17:52:34
18	know, family.	17:52:37
19	BY MR. TREECE:	17:52:39
20	Q And you received a document subpoena in	17:52:40
21	connection with this case; isn't that right?	17:52:42
22	A Yes.	17:52:47

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

196

1	MS. VASQUEZ: Calls --	17:52:48
2	THE WITNESS: Sorry.	17:52:50
3	BY MR. TREECE:	17:52:50
4	Q Did you provide to any counsel your text	17:52:51
5	messages with Johnny?	17:52:54
6	MS. VASQUEZ: Objection; that calls for a	17:52:57
7	legal conclusion and potentially it violates the	17:53:00
8	attorney-client privilege. But I'll let	17:53:02
9	Ms. Hickox state those objections.	17:53:05
10	MS. HICKOX: I join those objections.	17:53:08
11	Ms. Dembrowski, if you can answer those	17:53:11
12	questions -- that question without revealing any	17:53:12
13	communications that you had with me or anyone at	17:53:15
14	Stalwart Law Group, then you can do so.	17:53:17
15	THE WITNESS: I -- I provided what I was	17:53:22
16	asked to provide.	17:53:25
17	BY MR. TREECE:	17:53:27
18	Q Did you provide the text messages that	17:53:27
19	you've had with Johnny?	17:53:29
20	MS. VASQUEZ: Same objections.	17:53:32
21	THE WITNESS: If they were relevant to	17:53:38
22	what I was to provide. I don't recall everything	17:53:40

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

197

1	I provided.	17:53:44
2	BY MR. TREECE:	17:53:45
3	Q You're not -- let me ask you this: Did we	17:53:46
4	see today any of the text messages that you	17:53:49
5	believe you provided, if any?	17:53:52
6	MS. VASQUEZ: Objection; vague.	17:53:55
7	BY MR. TREECE:	17:54:02
8	Q You can answer.	17:54:02
9	A No, I don't recall those text messages,	17:54:07
10	so...	17:54:09
11	Q Do you recall assembling text messages,	17:54:10
12	texts between you and Johnny, to provide in	17:54:14
13	connection with this case?	17:54:16
14	A Yes, I recall providing all communications	17:54:21
15	within the scope of what I was asked to provide,	17:54:28
16	you know.	17:54:31
17	Q And I'm asking specifically about text	17:54:32
18	messages. And do you recall specifically	17:54:34
19	assembling text messages between you and Johnny to	17:54:37
20	provide in connection with this case?	17:54:40
21	A I did all text messages.	17:54:43
22	Q Did you talk with Mr. Depp before he filed	17:54:58

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

198

1	the case in the UK against The Sun?	17:55:02
2	MS. VASQUEZ: Objection; vague.	17:55:06
3	THE WITNESS: I'm -- I'm sure I spoke with	17:55:12
4	him.	17:55:14
5	BY MR. TREECE:	17:55:14
6	Q Did you speak with him about whether it	17:55:14
7	was wise to file suit against The Sun in the UK?	17:55:17
8	A I don't recall --	17:55:21
9	MS. VASQUEZ: Objection.	17:55:22
10	THE WITNESS: -- speaking to him about	17:55:23
11	that.	17:55:24
12	Sorry.	17:55:24
13	BY MR. TREECE:	17:55:25
14	Q Did you speak with him about the Virginia	17:55:25
15	litigation before he filed suit in Virginia?	17:55:27
16	MS. VASQUEZ: Objection; vague.	17:55:32
17	THE WITNESS: I don't -- I don't recall	17:55:40
18	speaking to him about his idea of filing.	17:55:42
19	BY MR. TREECE:	17:55:47
20	Q Did you speak to him about anything in	17:55:48
21	connection with the Virginia case before he filed?	17:55:53
22	MS. VASQUEZ: Objection; asked and	17:55:56

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CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

199

1	answered, vague and ambiguous.	17:55:58
2	MS. HICKOX: Join.	17:56:00
3	THE WITNESS: I -- I -- I don't recall.	17:56:02
4	BY MR. TREECE:	17:56:04
5	Q Have you spoken with Adam Waldman about	17:56:04
6	the Virginia litigation?	17:56:08
7	MS. VASQUEZ: Objection; vague.	17:56:10
8	THE WITNESS: No, not really.	17:56:23
9	BY MR. TREECE:	17:56:26
10	Q What do you mean "not really"?	17:56:26
11	MS. VASQUEZ: Argumentative.	17:56:27
12	THE WITNESS: Sorry.	17:56:33
13	I had someone reach out to me that I had	17:56:34
14	to refer to him.	17:56:42
15	BY MR. TREECE:	17:56:47
16	Q And who was that?	17:56:47
17	A Jennifer Howell.	17:56:51
18	Q And what did Jennifer Howell say to you?	17:56:54
19	MS. VASQUEZ: Calls for hearsay.	17:56:59
20	THE WITNESS: Jennifer had called me	17:57:09
21	because she had realized some information that was	17:57:10
22	in the UK court that she knew to be incorrect.	17:57:17

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

200

1	BY MR. TREECE:	17:57:29
2	Q And how did she reach out to you, by text?	17:57:30
3	A I -- I don't recall. I believe by phone	17:57:39
4	maybe. I don't recall.	17:57:42
5	Q Have you checked to see if you have a text	17:57:44
6	message from her in reference to what you're	17:57:46
7	talking about now?	17:57:49
8	MS. VASQUEZ: Objection; vague and	17:57:51
9	ambiguous.	17:57:52
10	THE WITNESS: No.	17:57:57
11	BY MR. TREECE:	17:58:08
12	Q I just want to make sure I understand your	17:58:08
13	testimony with respect to Johnny's career	17:58:10
14	trajectory. I mean, you've witnessed his career	17:58:14
15	trajectory since he's, you know, been an actor; is	17:58:16
16	that fair?	17:58:21
17	A Relatively.	17:58:25
18	Q And have you noticed his career tapering	17:58:27
19	off at any point?	17:58:32
20	MS. VASQUEZ: Objection; vague and	17:58:34
21	ambiguous, asked and answered, improper opinion.	17:58:35
22	MS. HICKOX: Join.	17:58:43

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

201

1	THE WITNESS: Oh, you're waiting for --	17:59:08
2	I'm sorry. Have I noticed his career --	17:59:10
3	BY MR. TREECE:	17:59:13
4	Q Tapering off at any point.	17:59:13
5	MS. VASQUEZ: Same objections. Also calls	17:59:15
6	for a legal conclusion.	17:59:17
7	THE WITNESS: I -- not until -- not until	17:59:29
8	after allegations -- the false allegations came	17:59:51
9	out. I don't know how else to say it, so...	18:00:01
10	BY MR. TREECE:	18:00:04
11	Q Are you trying to -- strike that.	18:00:04
12	And I just want to -- want to pin that	18:00:08
13	down now. So how did you notice -- well, did you	18:00:14
14	notice his career tapering off in connection with	18:00:18
15	the publication from The Sun in the UK?	18:00:22
16	MS. VASQUEZ: Objection; vague and	18:00:27
17	ambiguous, calls for a legal conclusion, assumes	18:00:29
18	facts.	18:00:34
19	MS. HICKOX: Join.	18:00:36
20	MS. VASQUEZ: Calls for speculation.	18:00:40
21	THE WITNESS: I think the idea of the	18:00:45
22	career tapering off is not necessarily something I	18:00:46

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

202

1 can speak to but the -- the idea of, you know, 18:00:52
2 false allegations, headlines, things like that. 18:01:02
3 BY MR. TREECE: 18:01:06
4 Q Well, I think we've -- we've discussed 18:01:06
5 that you don't have personal knowledge about those 18:01:07
6 issues; isn't that right? 18:01:10
7 MS. VASQUEZ: Objection; argumentative, 18:01:12
8 vague and ambiguous, misstates prior testimony. 18:01:14
9 MS. HICKOX: Join. 18:01:18
10 THE WITNESS: I'm sorry. I don't 18:01:21
11 understand that question. 18:01:23
12 BY MR. TREECE: 18:01:24
13 Q How do you have personal knowledge -- or 18:01:24
14 do you have personal knowledge that any of those 18:01:26
15 allegations that you're referencing are false? 18:01:30
16 MS. VASQUEZ: Objection; vague and 18:01:34
17 ambiguous, assumes facts. 18:01:35
18 MS. HICKOX: Also compound. 18:01:40
19 THE WITNESS: I know that they're not 18:01:45
20 true. 18:01:47
21 BY MR. TREECE: 18:01:48
22 Q And how do you know that? 18:01:48

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

203

1	A I know that from just as we went through	18:01:59
2	life that, you know, he was none of the, you know,	18:02:08
3	things he was accused of.	18:02:13
4	Q Yeah. And that's a really general	18:02:17
5	statement. You're saying that you know they're	18:02:19
6	not true, and I'm trying to figure out how you	18:02:21
7	know they're not true. Like, what -- what did you	18:02:24
8	see or witness that leads you to conclude they're	18:02:26
9	not true?	18:02:29
10	MS. VASQUEZ: Objection; calls for a	18:02:30
11	conclusion, vague and ambiguous, argumentative,	18:02:32
12	compound.	18:02:36
13	MS. HICKOX: Join. And also calls for a	18:02:39
14	narrative.	18:02:41
15	MS. VASQUEZ: And unintelligible.	18:02:42
16	THE WITNESS: I think I'm close enough to	18:03:11
17	the situation and the people to understand that	18:03:19
18	things weren't necessarily true.	18:03:28
19	BY MR. TREECE:	18:03:30
20	Q And what I'm trying to find out is how you	18:03:30
21	know that. You're giving a general statement of I	18:03:33
22	just -- I just know is the way I'm interpreting	18:03:35

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

204

1	it. And I don't mean to be mischaracterizing your	18:03:39
2	testimony on that. I'm just trying to help you	18:03:42
3	understand that I'm looking for specific	18:03:44
4	information as to how you reach your conclusion	18:03:46
5	that -- and that's what I'm asking you to provide.	18:03:49
6	So what specific information do you	18:03:52
7	have -- strike that.	18:03:57
8	I mean, what did you see or witness that	18:03:59
9	would lead you to conclude allegations that you're	18:04:00
10	referencing are not true?	18:04:05
11	MS. VASQUEZ: Objection; asked and	18:04:07
12	answered, badgering, calls for a legal conclusion,	18:04:09
13	vague and ambiguous.	18:04:19
14	THE WITNESS: I'm -- excuse me.	18:04:25
15	It -- generalizing all of the allegations,	18:04:27
16	you know, seems to be what you're doing. I can't	18:04:34
17	be specific to each instant anything.	18:04:38
18	BY MR. TREECE:	18:04:45
19	Q Well, let's do this: What specific	18:04:45
20	allegation do you think has been made -- give me	18:04:47
21	an example. I'm not asking for an exhaustive	18:04:51
22	list. I'm not trying to get overbroad. But can	18:04:54

CONFIDENTIAL
Transcript of Christi Dembrowski
Conducted on February 22, 2022

205

1	you think of a specific allegation that you know	18:04:56
2	of that's not true and give me the personal	18:04:58
3	knowledge that you have as to why that's not true?	18:05:01
4	MS. VASQUEZ: Objection; asked and	18:05:04
5	answered. I mean, this is -- this is -- this is	18:05:05
6	highly inappropriate, counsel. This is -- you're	18:05:13
7	badgering the witness.	18:05:16
8	MR. TREECE: I'm not badgering the	18:05:17
9	witness. I'm -- this is a discovery deposition.	18:05:19
10	I'm trying to discover what she knows. I'm	18:05:21
11	entitled to do that.	18:05:23
12	MS. VASQUEZ: Okay. You're not entitled	18:05:25
13	to badger the witness. You're not entitled --	18:05:27
14	MR. TREECE: I'm not badgering the	18:05:28
15	witness. I'm trying to drill down to what she	18:05:30
16	claims she knows, and I'm trying to figure out the	18:05:32
17	basis for that assertion. And I'm entitled to do	18:05:34
18	that. We don't need to continue there.	18:05:37
19	And could the court reporter please read	18:05:37
20	that back.	18:05:39
21	MS. VASQUEZ: I am going to state my	18:05:39
22	objections on the record and not be interrupted by	18:05:41

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Conducted on February 22, 2022

206

1 you, Mr. Treece. I know you like to do that, but 18:05:43
2 I'm going to state my objections on the record. 18:05:46
3 You are badgering the witness, highly 18:05:48
4 inappropriately, asked and answered for the fifth 18:05:50
5 time at this point. It's just inappropriate. 18:05:55
6 MR. TREECE: All right. If the court 18:06:01
7 reporter could read back the question, please. 18:06:02
8 Thank you. 18:06:04
9 (The record was read as requested.) 18:06:40
10 MS. VASQUEZ: It's also compound. 18:06:41
11 THE WITNESS: I'm -- I am not going to 18:06:59
12 speak of anything specific because I don't recall 18:07:02
13 specifics. What I know is that over all this time 18:07:05
14 during the time frames of these times none of this 18:07:12
15 was ever brought up, so... 18:07:18
16 BY MR. TREECE: 18:07:24
17 Q Now, we've gone through various text 18:07:25
18 messages between you and Ms. Heard, correct? 18:07:35
19 A Yes. 18:07:38
20 Q And in those text message -- messages with 18:07:39
21 you she brought up allegations of emotional abuse, 18:07:42
22 did she not? 18:07:47

IU; R; 17
H; IR;
MS; 18
AR;
SP; 19
VA;
AF; P 20

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35156

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

207

1 MS. VASQUEZ: Objection; misstates the 18:07:48
2 testimony, mischaracterizes the documents, assumes 18:07:50
3 facts, calls for hearsay, overly broad, vague and 18:07:54
4 ambiguous. 18:07:58

5 MR. TREECE: I will give you all of them, 18:08:01
6 whatever -- and any others you think of later you 18:08:03
7 can have. That's not a problem. 18:08:05

8 BY MR. TREECE: 18:08:07

9 Q Ms. Dembrowski, can you answer? 18:08:08

IU; R; 10 A She brought up arguments. She brought up 18:08:12
H; IR; 11 feelings. 18:08:16
MS; 12

AR; 13 Q And you don't have any personal knowledge 18:08:19
SP; 14 to dispute the veracity of her statements and 18:08:21
VA; 15 feelings; isn't that right? 18:08:26
AF; P 16

17 MS. VASQUEZ: Objection; argumentative and 18:08:28
18 misstates the prior testimony. 18:08:34

IU; R; H; 19 THE WITNESS: I don't have any personal 18:08:42
IR; MS; 20 knowledge to support them. 18:08:43
AR; SP; 21
VA; AF; P 22

23 BY MR. TREECE: 18:08:47

IU; R; 24 Q Or rebut them? 18:08:47
H; IR; 25

MS; 26 MS. VASQUEZ: Argumentative. 18:08:49

AR; 27 BY MR. TREECE: 18:08:53
SP; 28
VA; 29
AF; P 30

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

208

IU; R; 1 H; IR;	Q Correct?	18:08:53
MS; 2 AR;	A Other than no one -- no one around had	18:09:00
SP; 3 VA;	knowledge either. She came to me to talk about	18:09:08
AF; P 4	things. She didn't talk specifically about	18:09:13
5	anything, so...	18:09:19
6	MR. TREECE: All right. I don't think I	18:09:24
7	have any more questions at the moment.	18:09:25
8	Ms. Vasquez may have questions for you; and if she	18:09:29
9	does, I may follow up.	18:09:32
10	MS. VASQUEZ: I do not.	18:09:33
11	MR. TREECE: All right. Well,	18:09:36
12	Ms. Dembrowski, I appreciate your time today, so	18:09:38
13	thank you for appearing. I know depositions are	18:09:41
14	not a ton of fun, but I do appreciate you taking	18:09:44
15	the time.	18:09:47
16	THE VIDEOGRAPHER: Anything else before we	18:09:50
17	close, Ms. Vasquez?	18:09:52
18	MS. VASQUEZ: No. Thank you.	18:09:53
19	MR. TREECE: And I will say just -- I'm	18:09:54
20	not sure what the protocol has been, so I'll go	18:09:56
IU; R; H; IR; MS; 21	ahead and say I would like to admit all of the	18:09:59
AR; SP; VA; AF; P 22	exhibits that I've added to the Chat into	18:10:01

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Transcript of Christi Dembrowski
Conducted on February 22, 2022

209

1	evidence.	18:10:03
2	MS. VASQUEZ: If there's nothing else,	18:10:05
3	time is 6:10, and this concludes today's	18:10:07
4	deposition of Christi Dembrowski. We're off the	18:10:11
5	record.	18:10:13
6	(The deposition was concluded.)	18:10:14
7		
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Transcript of Christi Dembrowski
Conducted on February 22, 2022

210

1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Kristi R. Weaver, RPR, an Electronic
3 Notary Public for the Commonwealth of Virginia at
4 Large, of qualification in the Circuit Court of
5 the City of Chesapeake, whose commission expires
6 September 30, 2022, physically located in
7 Chesapeake, Virginia, do hereby certify that
8 CHRISTI DEMBROWSKI was remotely duly sworn by me;
9 was thereupon examined upon her oath by counsel;
10 that her examination was recorded in stenotype by
11 me and reduced to typescript under my direction;
12 and that the foregoing transcript constitutes a
13 true, accurate, and complete transcript.

14 I further certify that I am not related to
15 nor otherwise associated with any party or counsel
16 to this proceeding, nor otherwise interested in
17 the event thereof.

18 Given under my hand and notarial seal at
19 Norfolk, Virginia this 28th day of February, 2022.

20

21

22



Kristi R. Weaver

Kristi R. Weaver, eNotary 196896
CCR No. 0313158

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35160

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Transcript of Christi Dembrowski
 Conducted on February 22, 2022

211

A			
ability	188:8, 190:17, 191:18, 197:17, 198:6, 198:10, 198:14, 198:18, 198:20, 199:5, 200:7, 202:5, 208:3, 208:4	acted	affecting
12:14, 30:2, 60:17, 143:21, 177:5	above	96:16	60:17, 177:5
able	73:2, 171:22, 174:22, 175:11, 176:4	action	afraid
12:10, 25:2, 30:10, 31:1, 54:19, 70:20, 78:1, 79:19, 100:11, 144:2, 160:21	absolutely	1:5, 39:4, 41:8	131:4, 144:10, 145:12
about	87:10	actor	after
11:1, 11:18, 22:14, 35:17, 36:4, 38:12, 45:9, 46:8, 47:9, 47:20, 48:16, 49:1, 49:6, 49:19, 50:7, 50:13, 51:8, 52:2, 52:7, 53:8, 55:10, 66:8, 66:19, 74:14, 75:4, 76:7, 76:10, 76:12, 76:15, 77:7, 77:15, 78:4, 78:12, 78:15, 81:6, 81:16, 82:1, 82:10, 86:3, 97:3, 97:18, 104:16, 112:17, 113:11, 113:12, 114:3, 114:14, 114:17, 116:6, 116:9, 123:10, 128:14, 133:1, 133:3, 134:6, 137:21, 138:12, 139:15, 148:8, 151:16, 165:19, 167:11, 171:17, 175:9, 177:1, 183:7, 184:11, 184:12,	abundantly	23:1, 200:15	46:8, 73:17, 85:14, 98:6, 98:16, 104:16, 104:17, 201:8
	abuse	actress	again
	96:7, 108:18, 114:3, 114:12, 157:7, 166:16, 177:4, 206:21	124:5, 124:18	35:6, 39:20, 53:21, 66:7, 69:19, 72:20, 90:16, 91:20, 128:20, 141:7, 141:20, 160:16, 186:5, 187:6
	abusing	actual	against
	99:19, 100:1, 100:6, 100:10	83:12	10:18, 117:8, 190:17, 198:1, 198:7
	abusive	actually	age
	98:17	15:3, 45:8, 54:22, 62:21, 88:10, 98:7, 160:6, 160:22, 163:8, 176:14	15:13
	access	adam	ago
	12:16	199:5	10:8, 53:1, 105:6, 133:17
	accountability	add	agree
	161:1, 162:15	17:7, 40:7, 129:12	19:11, 19:21, 75:14, 101:2, 117:12, 125:9, 133:14, 135:11, 153:15, 154:4, 154:5, 164:1
	accountable	added	agreed
	110:14	208:22	165:22
	accounts	adderall	agreement
	6:16	97:10, 103:2	116:21, 117:17, 153:14, 154:20
	accurate	addictions	ahead
	210:13	157:20	51:3, 54:7, 102:8, 129:21, 147:21, 208:21
	accurately	address	aims
	26:16	9:14, 9:15, 9:16, 9:18, 21:15, 36:15, 121:9, 121:10, 121:15, 122:2, 122:3, 130:4, 172:15, 176:17	70:4, 70:8, 80:22
	accused	addresses	air
	203:3	121:14, 121:18	189:4
	aching	admit	
	107:3, 107:5, 108:10	208:21	
	acknowledge	adr	
	133:22	179:3	
	acknowledged	adults	
	172:22	15:15	
	act	advance	
	166:9, 166:16	88:9	
		advise	
		13:13	
		advised	
		146:11	

PLANET DEPOS

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CONFIDENTIAL

Transcript of Christi Dembrowski
Conducted on February 22, 2022

212

<p>alarming 148:7 alcohol 27:10, 27:19, 28:5, 39:8, 40:2, 40:18, 41:9, 42:15, 42:17, 43:19, 71:6, 72:9, 72:17, 75:16, 81:17, 82:3, 82:14, 92:7, 96:17, 101:22, 104:22, 105:11, 105:20, 106:10, 131:3, 136:6, 136:19, 144:15, 157:7, 157:21, 158:7, 177:4, 180:4 alcohol-infused 68:8, 94:15 alh 6:11, 6:12, 6:13, 31:5 alice 176:6 aligned 19:12, 19:22 allegation 204:20, 205:1 allegations 159:15, 201:8, 202:2, 202:15, 204:9, 204:15, 206:21 allow 59:12, 88:12, 88:16, 117:11, 117:17, 190:18 allowed 116:19 alluding 109:10 almost 163:19 alone 101:16, 126:15,</p>	<p>140:18 along 21:16, 23:2, 26:13, 39:1, 54:4, 129:22, 147:14, 147:15 already 59:10, 95:21, 113:19, 127:8 also 5:11, 12:5, 17:17, 20:5, 21:6, 26:20, 28:8, 29:22, 40:7, 42:22, 51:14, 68:20, 79:5, 86:22, 96:21, 98:1, 106:13, 117:10, 119:18, 129:11, 136:9, 138:1, 148:16, 156:16, 160:14, 163:18, 167:16, 176:6, 176:12, 181:16, 186:14, 189:7, 193:19, 201:5, 202:18, 203:13, 206:10 always 18:13, 37:1, 80:22, 91:22, 92:1, 97:6, 107:22, 123:10, 133:18 amber 1:8, 8:4, 8:15, 9:11, 26:4, 26:18, 33:9, 33:19, 35:1, 35:10, 36:13, 36:15, 37:2, 39:11, 39:22, 44:18, 47:9, 48:9, 48:16, 49:7, 49:20, 51:9, 52:3, 53:5, 53:14,</p>	<p>61:20, 62:8, 63:6, 63:19, 65:11, 67:2, 68:6, 69:10, 70:7, 70:9, 74:8, 76:2, 80:4, 81:5, 83:9, 83:20, 84:6, 87:8, 88:22, 89:7, 89:10, 89:20, 91:3, 92:5, 94:16, 95:6, 95:18, 95:20, 96:4, 96:6, 96:15, 97:19, 100:17, 101:11, 101:12, 101:13, 101:21, 102:9, 102:12, 102:22, 103:12, 104:16, 106:8, 106:18, 107:15, 109:12, 109:18, 110:3, 113:7, 123:15, 124:9, 125:1, 125:11, 131:13, 131:22, 133:4, 133:15, 134:6, 134:15, 139:3, 144:13, 145:9, 145:10, 148:18, 150:21, 151:6, 153:13, 154:3, 154:18, 157:19, 159:12, 166:10, 166:17 amber's 73:1, 77:7, 125:18, 131:14, 143:2 ambiguous 17:7, 33:13, 35:3, 36:19, 38:5, 38:16, 41:21, 43:1, 43:22, 45:16, 47:12, 48:20,</p>	<p>49:22, 50:17, 53:19, 57:9, 58:1, 59:2, 60:3, 60:20, 69:13, 69:22, 72:2, 77:20, 84:1, 90:1, 91:14, 92:18, 93:6, 98:10, 100:8, 101:5, 111:19, 112:11, 113:2, 113:16, 125:21, 129:7, 133:11, 135:13, 136:22, 139:12, 148:11, 151:19, 153:10, 155:1, 162:6, 164:13, 164:21, 170:14, 173:3, 180:22, 182:21, 184:7, 188:13, 192:4, 193:8, 193:17, 194:12, 195:6, 199:1, 200:9, 200:21, 201:17, 202:8, 202:17, 203:11, 204:13, 207:4 ambition 124:6, 124:19, 125:18 america 184:11 angeles 89:11 anger 70:5, 70:9, 161:11, 162:3, 162:17 animalistic 164:19 another 35:13, 35:17, 58:13, 58:14, 86:1, 86:2, 86:8, 124:17, 135:6, 135:7,</p>
--	--	--	---

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

213

<p>165:20, 183:22 answer 11:12, 11:13, 11:17, 13:6, 15:2, 15:4, 15:8, 15:10, 17:9, 21:14, 21:17, 40:12, 59:13, 61:1, 62:15, 76:22, 129:9, 152:1, 165:2, 169:11, 192:22, 196:11, 197:8, 207:9 answered 14:3, 18:21, 20:4, 43:21, 46:1, 49:9, 50:1, 52:10, 58:8, 60:13, 68:2, 73:12, 73:22, 77:20, 79:14, 86:21, 90:15, 91:15, 93:5, 93:21, 96:2, 98:21, 105:22, 121:20, 123:18, 125:4, 125:13, 129:8, 133:17, 134:17, 136:8, 145:14, 147:5, 156:10, 158:13, 170:14, 173:15, 191:3, 192:18, 192:20, 193:1, 193:9, 199:1, 200:21, 204:12, 205:5, 206:4 any 10:3, 13:19, 19:5, 19:8, 22:2, 27:5, 30:17, 34:21, 41:6, 45:20, 47:8, 47:20, 48:15, 49:5, 51:7, 51:8,</p>	<p>52:6, 52:17, 52:18, 53:7, 53:8, 53:12, 56:7, 57:7, 57:19, 58:18, 58:19, 59:17, 76:1, 78:4, 86:4, 86:17, 92:16, 96:9, 100:12, 113:20, 114:14, 128:14, 133:8, 134:5, 134:14, 136:3, 138:10, 139:19, 140:3, 147:13, 147:14, 148:6, 154:20, 155:19, 163:8, 166:9, 166:15, 166:16, 178:6, 196:4, 196:12, 197:4, 197:5, 200:19, 201:4, 202:14, 207:6, 207:12, 207:17, 208:7, 210:15 anyone 110:12, 140:18, 171:13, 172:1, 196:13 anything 13:15, 49:14, 67:9, 72:5, 106:2, 106:4, 113:11, 114:14, 115:5, 130:5, 143:17, 144:2, 193:4, 198:20, 204:17, 206:12, 208:5, 208:16 apparently 179:14 appearance 12:18 appearing 208:13 appears 66:19, 70:17,</p>	<p>127:21, 167:12 appended 6:7, 7:2 appointment 108:2 appraised 184:21, 185:3 appreciate 16:10, 208:12, 208:14 approach 116:3 appropriate 130:14 april 178:8, 178:12 aren't 140:4, 143:12, 155:13 arguing 45:9 argument 43:4, 43:17, 46:21, 47:2, 47:9, 52:18, 78:19, 114:15, 160:1 argumentative 18:20, 19:14, 20:4, 20:13, 41:10, 44:13, 60:5, 60:13, 60:19, 76:4, 105:22, 112:12, 113:3, 113:15, 114:9, 156:3, 156:9, 159:20, 161:18, 163:11, 199:11, 202:7, 203:11, 207:15, 207:21 arguments 36:14, 50:8, 50:13, 51:9, 51:20, 52:7, 207:10 arose 34:21</p>	<p>around 25:22, 34:13, 38:11, 47:10, 61:20, 71:1, 71:22, 72:8, 72:14, 73:10, 90:12, 131:2, 131:22, 133:2, 133:4, 133:15, 138:12, 138:17, 139:21, 172:3, 173:1, 173:8, 180:19, 184:5, 185:11, 208:2 art 184:20, 185:3 articulate 143:13 asap 189:13 asked 10:22, 14:2, 18:21, 20:4, 38:9, 43:21, 45:22, 49:8, 50:1, 52:10, 57:12, 57:16, 57:18, 58:7, 60:12, 68:1, 73:11, 73:14, 73:22, 74:20, 77:19, 79:14, 86:20, 90:15, 91:14, 93:5, 93:21, 96:1, 98:21, 105:22, 121:20, 123:18, 125:3, 125:12, 129:8, 133:16, 134:16, 136:8, 145:13, 147:4, 156:10, 158:12, 159:7, 159:16, 170:14, 173:14, 191:3, 191:18, 192:18, 193:1, 193:9, 193:13, 196:16, 197:15,</p>
---	---	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
Conducted on February 22, 2022

214

198:22, 200:21, 204:11, 205:4, 206:4 asking 13:15, 24:7, 57:18, 62:6, 62:7, 89:7, 98:11, 100:3, 100:4, 138:8, 164:10, 166:2, 197:17, 204:5, 204:21 assembling 197:11, 197:19 assertion 41:7, 205:17 associated 210:15 associates 3:19 assume 71:15 assuming 31:12, 79:8 assumption 82:22 attached 12:8, 29:14, 54:16, 61:6, 88:3, 115:16, 156:19, 167:6, 168:20, 174:3, 178:2, 181:21, 183:18, 185:8, 187:12, 188:22, 190:6 attending 8:11 attention 137:4 attorney-client 196:8 august 157:2, 188:4 australia 151:7, 151:13, 151:16, 177:18, 194:10	avoid 67:10, 118:13 aware 27:5, 27:9, 29:1, 34:11, 34:18, 34:21, 36:13, 89:19, 90:4, 90:7, 93:1, 95:5, 95:16, 111:1, 111:7, 111:16, 111:22, 124:16, 131:21, 144:13, 144:22, 150:19, 153:13, 154:3, 164:17, 168:6, 172:21, 180:3, 180:18, 181:12, 184:3, 184:10, 184:20, 192:8, 192:15, 194:9, 194:14, 195:3 away 142:21, 143:22, 144:3 <hr/> <p style="text-align:center">B</p> <hr/> back 12:20, 29:12, 37:6, 42:10, 48:5, 88:13, 95:14, 100:16, 100:21, 101:2, 101:10, 103:1, 106:19, 107:21, 108:9, 113:9, 114:4, 133:5, 138:20, 140:6, 141:9, 158:9, 205:20, 206:7 back-end 184:12 back-ends 184:11 background 21:22 badger 205:13	badgering 125:4, 149:1, 156:10, 163:12, 192:19, 204:12, 205:7, 205:8, 205:14, 206:3 bahamas 157:19 bailey 169:21, 174:13 bailey's 169:22, 170:6 balance 55:7 band 188:9 bandaged 153:2 bank 184:11, 190:13, 190:16, 191:10 based 59:14, 77:17, 99:9, 99:14, 113:13, 128:21 basically 41:3 basis 11:1, 205:17 bates 31:6, 31:9, 31:21, 83:15, 100:17, 126:6, 131:9, 132:7, 137:5, 138:22, 142:7, 150:8, 152:4, 155:7 bathroom 85:14 bchew@brownrudni- ck 4:9 because 13:12, 18:16, 20:1, 42:16, 45:13, 68:21, 73:7, 74:12, 74:20, 81:16,	82:3, 88:10, 92:6, 96:10, 97:10, 99:22, 100:12, 109:6, 110:11, 111:7, 118:15, 122:7, 145:10, 145:18, 161:15, 164:10, 180:4, 187:1, 188:10, 199:21, 206:12 become 29:1 becomes 163:3 been 9:6, 10:6, 27:16, 28:12, 31:1, 37:13, 51:10, 80:16, 84:16, 95:1, 96:8, 96:9, 101:20, 102:14, 111:2, 111:4, 115:13, 131:1, 131:2, 133:1, 133:2, 133:18, 143:20, 145:20, 165:18, 176:5, 177:14, 188:20, 193:13, 193:22, 200:15, 204:20, 208:20 before 2:10, 10:1, 13:10, 30:17, 47:18, 47:19, 49:3, 62:15, 91:20, 105:1, 112:7, 113:10, 115:5, 116:3, 130:2, 169:11, 197:22, 198:15, 198:21, 208:16 beginning 62:5, 89:6 begins 8:2
---	--	--	---

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35164

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Transcript of Christi Dembrowski
 Conducted on February 22, 2022

215

<p>behalf 3:2, 4:3, 4:11, 5:3, 8:14, 8:17, 8:19, 8:22 behaved 109:19 behavior 95:7, 144:15 behaviors 161:2, 164:19 behind 92:13, 174:18, 189:15 being 35:17, 53:13, 60:6, 72:14, 72:21, 74:5, 77:22, 95:17, 97:13, 98:3, 99:1, 99:3, 106:2, 118:11, 143:20, 171:2, 172:22, 173:9, 188:16, 194:6 belated 130:11 believe 10:15, 12:19, 25:20, 29:20, 46:20, 75:4, 81:12, 92:1, 108:7, 121:21, 151:12, 197:5, 200:3 believes 37:8, 66:7 belligerent 98:17 below 58:12, 75:1, 123:21, 128:1, 135:3, 176:15, 190:15 ben 8:17 bender 66:1, 73:8, 76:11, 79:2,</p>	<p>82:14 benjamin 4:4, 4:13 berated 103:2 beside 120:5 best 40:8, 42:20, 45:5, 58:22, 68:14, 71:11, 75:7, 82:19, 119:13, 143:20 bet 137:17 bettany 85:15 better 31:20, 87:7, 91:5, 91:18, 92:1, 131:1, 131:21, 133:2, 133:15, 134:2, 137:20, 137:21, 163:4 between 33:8, 53:5, 61:20, 62:8, 88:22, 95:6, 124:8, 128:17, 129:4, 130:7, 135:4, 142:12, 164:9, 166:10, 166:17, 169:7, 179:4, 183:3, 197:12, 197:19, 206:18 beyond 108:1 big 151:16 bigger 119:7, 119:11, 186:21 binge 67:12, 67:21, 68:18, 68:21, 71:7, 72:9,</p>	<p>72:17, 72:21, 73:8, 80:17, 84:16, 85:3, 85:6, 85:14 bit 57:15, 119:11, 157:17, 161:6, 168:18, 174:6 blacks 111:8 bloom 10:15, 10:18, 11:19 blow 86:3 blowing 84:14 blue 35:10 book 22:18 booze 35:14, 35:18, 37:13, 45:2, 45:14, 67:12, 67:21, 70:8, 73:8, 82:11, 82:15 boss 17:15, 17:20, 17:21, 18:3, 18:14 boston 89:11, 90:8 both 100:19, 129:1, 143:22 bottom 31:6, 31:17, 46:7, 110:10, 122:9, 126:5, 126:13, 130:18, 131:8, 131:10, 132:16, 139:3, 152:11, 153:22, 171:11, 174:12, 185:19 bouncing 71:1, 71:21</p>	<p>box 12:5, 12:16, 35:10, 38:13, 115:14, 119:9 break 49:15, 54:7, 81:1, 114:22, 165:20 breaking 110:7 brian 20:21, 20:22 bridge 21:18 bring 36:11 bringing 167:22 broad 26:9, 207:3 brokenhearted 104:18 brother 14:12, 14:13, 15:22, 16:18, 20:10, 20:16, 22:22, 26:9, 26:17, 27:6, 27:18, 36:16, 47:9, 47:20, 49:6, 49:19, 51:8, 51:18, 52:2, 52:7, 55:19, 57:7, 57:13, 57:19, 59:21, 60:11, 76:10, 77:9, 78:15, 79:22, 148:3, 149:21, 161:15, 161:21 brother's 19:22 brottenborn@wood- srogers 4:19 brought 206:15, 206:21, 207:10</p>
---	---	---	--

PLANET DEPOS

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CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

<p>brown 3:4, 3:11, 4:5, 8:18 bruckheimer 172:5, 175:12, 175:17, 176:1 bruckheimer's 172:10 builds 94:14 bullshit 124:5, 124:19</p> <hr/> <p style="text-align: center;">C</p> <p>c 139:10 california 3:6, 5:7, 9:17, 15:5, 114:19, 190:16 call 17:2, 31:20, 87:9, 97:13, 135:15, 147:10, 148:8, 169:22, 174:22 called 9:5, 30:6, 154:17, 172:14, 175:12, 178:14, 199:20 calling 147:12, 148:3, 175:3, 175:10 calm 46:13, 83:13 calmed 150:22 camarillo 9:17 came 133:4, 143:15, 160:9, 201:8, 208:3 camille 3:3, 8:18, 32:14, 64:1, 118:7, 122:1</p>	<p>can't 67:9, 71:15, 91:3, 91:18, 143:18, 190:18, 204:16 cancel 154:12 capacity 23:1, 24:7 captain 153:4 career 125:18, 180:3, 180:18, 200:13, 200:14, 200:18, 201:2, 201:14, 201:22 caribbean 169:8, 172:11, 174:17 carries 100:20 carryover 174:6 case 8:6, 10:3, 10:4, 11:9, 55:5, 161:14, 161:21, 195:21, 197:13, 197:20, 198:1, 198:21 caused 193:14, 194:2, 194:3, 194:7, 194:10, 195:4 cc'd 189:7 ccr 210:23 cd 30:6 central 11:8 certain 30:14, 53:4 certainly 33:1 certify 210:7, 210:14</p>	<p>chain 32:11, 32:12, 33:3, 33:8, 33:18, 37:7, 46:5, 68:16, 75:15, 101:20, 104:13, 109:12, 113:13, 114:4, 127:22, 152:6, 152:7 chains 95:21 chances 111:4 change 108:2, 171:13 changed 133:4, 134:1 characterization 164:2 characterize 186:16, 186:19, 186:20, 187:7 charge 194:6 chat 12:5, 12:16, 30:2, 30:4, 30:5, 54:18, 61:10, 61:13, 115:14, 119:9, 120:9, 122:15, 124:1, 126:8, 126:17, 127:4, 127:14, 127:20, 128:2, 150:9, 150:10, 208:22 chats 126:15, 127:9, 127:21, 128:4 checked 200:5 chesapeake 210:5, 210:7 chew 4:4 childlike 163:20</p>	<p>children 14:14, 14:16, 14:21, 15:13, 15:15, 60:7, 133:8 chooses 117:12 choosing 118:3 chris 120:16 christi 1:15, 2:1, 5:3, 6:3, 8:3, 8:22, 9:5, 9:16, 13:14, 30:1, 61:9, 97:16, 122:17, 128:9, 174:19, 188:3, 189:12, 209:4, 210:8 cindy 5:4, 8:21 cindy@stalwartlaw 5:9 circuit 1:2, 8:5, 210:4 city 210:5 civil 1:5 cl- 1:6, 8:6 claims 159:6, 205:16 clarify 129:17 clear 44:16, 127:11, 128:13, 129:10, 163:4, 163:5, 167:18 clearly 173:4, 176:7 click 30:5, 30:9, 30:18 client 62:12</p>
---	---	--	--

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

217

<p>climbing 96:8 close 203:16, 208:17 cocaine 29:2, 29:8, 86:9, 86:18, 87:3 cocounsel 8:16 coke 35:14, 35:18, 37:14, 43:19, 45:2, 45:14, 67:12, 67:21, 68:8, 70:8, 71:6, 72:9, 72:17, 73:8, 75:3, 76:15, 82:12, 135:7, 135:19, 158:7, 158:10, 158:18 colleague 8:16 collection 184:21, 185:3 college 22:4 color 31:22 column 119:1, 120:8, 123:2 com 3:8, 3:15, 4:9, 4:18, 4:19, 5:9, 121:11 combo 39:3, 41:8 come 29:12, 70:3, 70:20, 74:9, 88:13, 108:3, 178:17 commiserating 84:15 commission 210:5</p>	<p>committed 160:6 commonwealth 2:11, 210:1, 210:3 communicated 164:11 communications 196:13, 197:14 companies 57:7, 57:20 company 15:18, 15:19, 15:21, 16:17, 18:1, 18:4, 18:9, 18:19, 19:5, 20:1, 20:10, 20:15 complaint 13:22 complete 210:13 compound 11:3, 20:3, 23:4, 25:7, 26:22, 27:11, 32:17, 35:3, 35:20, 36:6, 36:18, 38:16, 41:11, 42:22, 45:15, 50:17, 51:15, 52:9, 53:18, 59:1, 73:11, 74:16, 76:5, 81:19, 82:17, 85:16, 92:9, 94:19, 95:9, 98:1, 98:20, 101:4, 103:4, 105:21, 109:2, 131:15, 162:21, 166:12, 173:11, 173:14, 177:9, 186:15, 188:13, 193:19, 202:18, 203:12, 206:10 computer 30:11, 132:11</p>	<p>conceal 155:20 concern 73:19, 74:5, 109:4, 158:22 concerned 77:17, 81:6, 81:16, 97:18 concerns 77:7, 113:13, 172:15 conclude 27:18, 28:4, 99:10, 203:8, 204:9 concluded 209:6 concludes 209:3 conclusion 16:13, 18:11, 18:21, 20:12, 24:12, 25:7, 25:17, 28:18, 33:14, 44:14, 56:22, 57:22, 62:1, 63:8, 63:21, 77:12, 86:19, 89:3, 114:2, 128:7, 129:7, 140:14, 160:12, 160:13, 181:15, 182:22, 187:3, 196:7, 201:6, 201:17, 203:11, 204:4, 204:12 conclusions 113:12 conducted 1:16, 2:2 confidential 1:14, 59:11 confirm 128:15, 128:16 conflict 86:4 confused 76:20</p>	<p>confusing 148:3 connection 10:3, 10:10, 10:14, 10:17, 34:22, 127:22, 195:21, 197:13, 197:20, 198:21, 201:14 consider 17:14, 18:3, 18:8 consideration 186:9 considered 17:19, 18:13 console 83:7, 83:12 constant 51:20, 78:19 constitutes 210:12 consuming 39:7, 97:12, 186:8 content 174:8, 178:6 contents 40:9, 106:21 context 82:13, 150:2, 155:18, 158:15, 180:1 continue 63:11, 205:18 continues 97:13 continuing 67:11, 67:21 contract 189:11 control 75:3, 76:14, 92:8, 119:14, 119:16, 119:18 controlled 16:18, 16:22 convenient 49:15</p>
---	--	---	---

CONFIDENTIAL

Transcript of Christi Dembrowski
Conducted on February 22, 2022

218

<p>conversation 49:18, 50:11, 52:6, 52:17, 84:11, 87:15, 114:14, 147:13, 147:14, 163:4, 163:7, 163:9, 163:10, 163:15, 183:2, 183:5, 188:16 conversations 48:22, 50:7, 50:13, 51:17, 52:1, 53:1, 114:13, 114:16, 184:18 conveyed 42:13, 70:9, 75:10, 77:18, 81:5, 84:19, 96:15, 101:1, 111:15, 147:2, 179:17 conveying 71:5, 77:7, 97:19, 108:16 conveys 73:18, 81:15 cooper 178:9 copied 182:3, 182:8, 183:5, 187:19, 189:9 copy 143:2, 189:3 correct 12:2, 14:8, 19:13, 20:2, 20:10, 31:14, 37:14, 40:2, 42:17, 44:8, 44:18, 45:2, 49:3, 50:6, 59:21, 60:11, 61:16, 65:12, 65:17, 66:14, 68:21, 69:9,</p>	<p>69:11, 74:15, 75:10, 77:9, 77:18, 79:2, 79:12, 79:22, 80:9, 81:6, 81:17, 82:4, 83:9, 83:21, 84:19, 86:9, 90:9, 93:19, 95:8, 98:14, 101:13, 102:10, 104:8, 108:19, 109:19, 118:5, 119:5, 123:3, 123:6, 139:8, 142:10, 143:3, 144:16, 145:3, 145:12, 146:13, 150:14, 152:8, 152:14, 154:13, 155:10, 158:11, 158:19, 159:8, 162:3, 167:15, 170:20, 171:4, 171:17, 173:9, 173:13, 175:4, 175:18, 178:12, 178:20, 182:19, 183:8, 186:10, 187:1, 193:7, 206:18, 208:1 correction 130:15 could 15:7, 35:5, 35:11, 56:8, 74:15, 83:17, 84:2, 84:11, 91:5, 91:7, 114:21, 125:11, 125:15, 141:6, 144:3, 193:4, 205:19, 206:7 couldn't 111:4 counsel 8:12, 16:4, 29:15, 55:5,</p>	<p>76:19, 114:17, 116:2, 116:18, 116:21, 117:17, 117:22, 126:14, 165:18, 196:4, 205:6, 210:9, 210:15 counter 1:6, 1:10 counter-claimant 8:15 counterclaim 14:1 counts 117:8 county 1:2, 8:5 couple 67:2, 133:3, 179:4, 186:2 course 50:3, 102:12 court 1:2, 8:5, 9:1, 16:9, 59:10, 95:13, 117:16, 117:18, 141:8, 199:22, 205:19, 206:6, 210:4 crashing 143:15 crazy 67:10, 82:12 cross 21:18 culture 161:1, 162:16 curb 157:20 current 15:17 cut 21:8, 151:15, 152:2 cvasquez@brownru- dnick 3:8 cycle 94:13, 108:17</p>	<p style="text-align: center;">D</p> <p>dad 131:1, 131:22, 133:1, 133:15, 133:19 damage 193:14, 194:1, 194:3, 194:6, 194:10, 194:15, 194:17, 195:4 danny 14:12, 55:12 danny's 55:19 date 8:7, 55:8, 122:4, 138:13, 138:18, 139:17 dated 126:9, 127:5, 127:16, 137:10, 139:8, 183:22, 187:16 dates 10:9, 89:17, 90:17, 105:6, 105:7, 140:3, 140:4, 141:21, 142:2 dating 26:4, 26:18, 27:6, 27:8 daughters 14:17 david 157:2 day 96:8, 97:12, 113:10, 124:4, 150:22, 174:18, 176:5, 179:12, 210:19 day-to-day 193:11 days 80:18, 138:6, 151:13, 170:19,</p>
---	---	--	---

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

219

179:13 dc 4:7 deal 24:10, 24:17, 24:19, 24:21, 25:15, 96:11, 190:12 dealings 148:17 deals 96:11 debbie 14:12, 120:11, 150:20 december 168:7 decided 138:13 decides 95:3, 108:2 decision 108:4 decisions 17:12 declaring 136:4 defendant 1:6, 1:9, 4:11, 8:15 dembrowski 1:15, 2:1, 5:3, 6:3, 6:8, 7:3, 8:3, 8:22, 9:5, 9:10, 9:16, 11:7, 12:10, 15:10, 16:3, 17:8, 20:22, 21:21, 24:4, 26:2, 30:22, 44:3, 54:13, 55:3, 59:12, 59:15, 59:20, 61:1, 62:14, 62:19, 76:22, 87:19, 88:21, 115:12, 115:18, 116:22, 117:6,	118:20, 120:17, 122:17, 136:11, 147:21, 157:1, 165:5, 166:8, 167:21, 168:22, 169:10, 180:8, 182:1, 183:20, 185:10, 190:8, 196:11, 207:9, 208:12, 209:4, 210:8 demon 96:12, 96:16, 100:20, 101:2, 101:7, 144:9, 144:16, 145:11, 145:18, 146:12, 147:13 denial 86:3 depends 64:9 deponent 8:22 depos 8:10, 9:2 deposed 10:6, 10:7, 10:17 deposition 1:15, 2:1, 6:8, 6:9, 7:3, 8:3, 10:1, 11:9, 13:2, 13:10, 13:20, 15:6, 40:6, 62:13, 68:6, 118:3, 205:9, 209:4, 209:6 depositions 208:13 depp 1:4, 6:14, 6:15, 6:18, 6:19, 6:20, 6:21, 6:22, 7:4, 7:7, 8:4, 8:19, 10:18, 15:22,	16:18, 17:15, 18:3, 18:8, 22:22, 26:3, 29:1, 35:17, 55:12, 55:13, 122:6, 130:12, 161:11, 195:11, 197:22 depp's 55:5, 116:2, 117:22, 120:11 deriving 114:2 describe 26:3, 26:12, 26:15 described 113:21 description 72:6, 163:5, 164:7 descriptions 114:15 descriptive 145:16 desperately 144:7, 144:8 despite 83:8, 145:18 detail 6:17 details 128:14 deuters 139:3, 150:14, 152:19, 155:10 developed 23:8 developing 22:18, 25:11 development 22:10 diaries 103:3 die 97:13 difference 164:9	different 10:15, 57:15, 86:18, 96:12, 109:8, 109:9, 112:18, 116:3, 179:5 difficulties 45:13, 74:13 difficulty 181:6 dire 181:12, 182:18, 186:6 direct 30:13, 117:9, 118:11, 130:10, 137:4, 142:5, 149:4, 150:4, 155:5 direction 210:11 disagreements 41:17 discharged 154:18 discover 205:10 discovery 205:9 discuss 103:11 discussed 35:1, 188:5, 202:4 discussing 38:3, 102:14, 160:4 discussion 47:8, 51:7 discussions 47:20, 48:15, 49:5, 53:7, 53:14, 184:10, 184:12, 188:8 disk 8:2 disney 23:17, 24:1,
---	--	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

220

24:9, 24:17, 25:15, 169:22, 170:6, 170:12, 170:19 dispute 207:13 doctor 104:19, 104:22, 105:10, 105:19, 106:6, 137:19, 140:18, 141:12, 162:1 doctor's 108:1 document 12:13, 30:3, 30:15, 42:19, 45:6, 54:21, 58:20, 62:11, 62:15, 67:5, 69:4, 71:9, 74:2, 74:17, 76:18, 77:11, 79:14, 81:9, 84:1, 86:11, 88:8, 96:3, 96:19, 102:2, 103:21, 106:21, 107:7, 108:13, 108:21, 109:15, 111:11, 111:19, 114:6, 114:18, 117:7, 117:11, 117:14, 117:21, 119:15, 127:8, 135:13, 141:2, 143:5, 146:5, 155:22, 156:11, 157:9, 162:5, 162:21, 167:16, 169:11, 173:15, 179:20, 185:14, 186:12, 189:6, 195:20 documentary 34:13, 34:19, 34:22, 45:12 documents 13:19, 14:5,	40:10, 117:4, 207:2 doing 17:3, 82:14, 83:9, 106:4, 106:5, 111:16, 136:5, 146:10, 160:22, 179:3, 182:16, 188:3, 188:10, 204:16 dollars 56:17 done 13:2, 13:9, 31:2, 86:5, 91:20, 140:18 door 85:15 dose 42:6 double 146:15 doubt 76:1, 139:19 down 11:22, 31:14, 58:12, 67:2, 132:13, 143:15, 150:22, 201:13, 205:15 download 12:15, 29:16, 30:3, 30:10, 30:19, 31:1, 119:9 downloaded 31:3, 31:13, 31:15, 119:10 downloading 29:19, 61:10 dr 98:7, 98:12, 98:15, 99:7, 105:9, 105:14, 138:13, 139:5, 139:16, 139:20, 140:21, 141:14, 141:16, 157:6,	157:18, 159:4, 159:7, 159:11, 160:9, 160:16, 160:19, 161:2, 161:5, 163:17, 165:11, 167:11, 167:22 drama 50:10, 51:20 dramatic 37:1, 97:5, 148:18 draw 86:18 drawing 113:12 drawn 144:14 drew 5:13, 8:9, 166:1 drill 205:15 drinking 84:14, 96:7, 97:14, 135:6, 135:19, 158:10 drive 3:5, 5:6 driven 163:19, 164:2 drug 82:3, 94:14, 95:7, 96:7, 97:19, 104:22, 105:11, 105:20, 108:18, 136:19, 157:6, 157:20, 160:22, 162:16, 177:4, 180:4 drugs 27:9, 27:19, 28:5, 39:8, 40:2, 40:18, 41:9, 42:15, 42:16, 75:16, 81:17, 92:7, 96:17, 97:15,	101:22, 106:10, 136:5, 144:14, 160:22, 162:14 drum 184:13 duly 9:6, 210:8 during 26:4, 27:6, 27:8, 37:4, 42:14, 62:12, 102:13, 206:14 duties 22:8 <hr/> <p style="text-align: center;">E</p> <hr/> e-mail 6:15, 6:21, 7:5, 7:6, 7:7, 121:9, 121:10, 121:13, 121:15, 121:17, 122:3, 157:1, 159:4, 164:12, 165:11, 169:4, 169:21, 171:11, 173:7, 174:12, 176:3, 176:16, 178:5, 178:7, 178:11, 182:2, 182:7, 182:10, 183:21, 185:18, 187:15, 187:20, 188:4, 189:2, 190:9, 190:15 e-mails 6:18, 6:19, 6:20, 6:22, 7:4, 169:7, 171:12, 174:7, 178:5, 185:11 each 31:17, 136:4, 141:21, 204:17 earlier 81:12, 82:10, 146:2, 191:18 earpiece 192:9, 192:17,
---	---	---	--

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

221

193:3 eastern 8:8 echoes 71:1, 71:21 education 22:2 educational 21:21 effect 131:4, 131:14 efficient 64:4 efficiently 63:1 ego 164:10 eight 174:17 either 29:16, 53:7, 53:13, 88:10, 208:3 elaborate 112:9 electronic 210:2 else 115:5, 125:6, 130:5, 201:9, 208:16, 209:2 elsewhere 25:2, 193:15 emotional 110:9, 112:1, 112:18, 113:12, 114:3, 114:12, 166:16, 206:21 empathized 74:12 employed 20:7, 20:9, 20:15, 55:22 enable 29:19 end 12:15, 152:10, 182:15, 183:8	ends 108:8 engage 138:13 engaged 83:4, 98:7, 98:12 engaging 105:10 enotary 210:22 enough 91:6, 111:1, 111:7, 111:16, 111:22, 143:12, 203:16 ensued 144:15 enter 153:14 entire 30:15, 61:11, 62:11, 62:15, 68:15, 68:16, 160:22, 162:16 entirely 117:11 entitled 62:11, 205:11, 205:12, 205:13, 205:17 entries 55:6, 55:11 entry 58:6, 118:22 equivalent 97:11 esquire 3:3, 3:10, 3:17, 4:4, 4:12, 4:13, 5:4 essentially 94:12, 107:3 est 1:18 establish 40:9 europe 182:16	even 66:8, 91:7, 114:11, 126:20, 163:8, 178:16, 185:22, 186:8, 187:7 event 53:12, 102:14, 113:7, 210:17 events 53:4, 53:8, 53:12, 54:4, 60:17, 104:13 ever 27:18, 29:1, 29:8, 49:18, 50:3, 57:6, 57:19, 72:8, 72:16, 97:9, 104:21, 106:5, 131:12, 133:8, 143:16, 160:21, 188:4, 193:13, 193:22, 206:15 every 64:21, 92:2, 94:13, 96:8, 97:12, 108:7, 108:8, 117:13, 176:5 everyone 115:2, 115:19 everything 75:5, 76:16, 78:4, 196:22 evidence 40:8, 42:20, 45:5, 58:22, 68:14, 71:11, 75:7, 79:6, 82:19, 106:14, 209:1 evidently 159:5 exact 25:19, 25:21, 28:21, 92:2 exactly 19:18, 28:10,	43:16, 71:15, 177:19 examination 6:3, 9:8, 210:10 examined 9:6, 210:9 example 204:21 except 96:9 excerpts 68:15 exchange 87:16, 88:22, 89:6, 90:13, 90:21, 113:10, 124:8, 164:12 exclamation 93:15, 189:15 excuse 10:14, 14:11, 36:17, 41:16, 42:6, 79:1, 85:3, 86:1, 147:14, 163:2, 204:14 exhaustive 204:21 exhibit 6:8, 6:9, 6:10, 6:11, 6:12, 6:13, 6:14, 6:15, 6:16, 6:18, 6:19, 6:20, 6:21, 6:22, 7:3, 7:4, 7:5, 7:6, 7:7, 12:4, 12:7, 29:11, 29:13, 30:6, 54:14, 54:15, 56:15, 61:4, 61:5, 61:14, 61:18, 68:20, 88:1, 88:2, 88:21, 100:16, 115:13, 115:15, 115:20,
--	---	--	--

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

222

118:21, 138:7, 156:16, 156:18, 165:17, 167:3, 167:5, 168:17, 168:19, 168:22, 169:7, 171:11, 174:2, 174:12, 177:22, 178:1, 178:4, 181:19, 181:20, 182:2, 182:7, 183:16, 183:17, 183:20, 185:6, 185:7, 185:10, 187:10, 187:11, 188:20, 188:21, 190:4, 190:5, 190:9 exhibits 6:7, 7:2, 208:22 exists 144:6 expecting 93:18 experience 86:17 expert 28:8, 100:4, 166:20 expires 210:5 expla 189:14 explain 137:20, 185:21 express 125:17, 131:12, 133:9 extended 118:13 extent 68:14, 185:13, 189:5 extra 106:5 extras 170:18 <hr/> <p style="text-align: center;">F</p> <hr/> face 103:1, 177:17,	188:5 fact 100:12, 134:1, 143:18, 154:17 fair 58:5, 73:17, 159:17, 200:16 fairfax 1:2, 8:5 fall 87:12 falling 107:21 false 201:8, 202:2, 202:15 familiar 58:18, 59:4 family 60:7, 60:8, 195:18 fan 96:10 far 11:22 february 1:17, 8:7, 63:6, 63:19, 65:11, 134:22, 135:5, 169:9, 169:21, 174:13, 176:17, 185:12, 185:19, 210:19 feel 60:1, 60:7, 62:14, 101:6, 108:11, 110:5, 128:20, 143:12, 143:15 feeling 131:13 feelings 60:16, 207:11, 207:14 feels 153:3 felt 41:2, 51:18,	99:6, 160:4 few 10:8, 16:5 fifth 206:4 fight 39:3, 39:7, 40:1, 41:8, 41:15, 42:16, 70:4, 145:19, 159:6, 159:15 fighters 170:22 fighting 37:8, 48:17, 49:1, 49:7, 66:8, 66:9, 85:2 fight 36:14, 40:17, 49:19, 51:9 figure 53:15, 113:11, 203:6, 205:16 figured 120:3, 142:21 file 198:7 filed 10:18, 197:22, 198:15, 198:21 filing 198:18 fill 102:9, 144:9 film 22:19, 185:22, 186:8 filming 103:2, 191:14 films 186:21, 188:11 finally 46:9, 142:19 finances 184:5 financial 19:12, 19:13, 19:21, 19:22,	181:13, 182:19, 186:6 find 108:3, 113:14, 126:11, 148:9, 148:22, 203:20 finds 42:5 fine 23:10, 63:13, 65:2, 96:9, 166:1 finger 151:15, 152:2, 153:7 finish 32:19 finished 31:11 first 9:6, 9:13, 25:1, 32:3, 32:10, 33:18, 46:9, 50:11, 50:14, 51:5, 61:18, 62:6, 62:7, 63:4, 63:17, 73:19, 105:10, 116:19, 118:21, 120:8, 137:12, 142:18, 171:10, 174:9, 176:16 first-look 24:17, 24:19, 24:21, 25:14 fiscal 55:8 fit 114:16 five 133:17 fix 144:8 flesh 157:16 flies 188:5
---	---	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

223

<p>flight 89:11, 90:8, 102:21, 137:16 floor 3:5 flow 49:14 focus 11:8, 47:18, 74:7 follow 208:9 following 87:16, 142:6 follows 9:7, 174:7 foo 170:22 forcing 81:1 foregoing 210:12 foremost 116:19 forever 129:22 form 159:9 formal 22:2 format 129:13, 130:2 forty-five 115:2 forward 181:6, 190:10 forwarded 145:11 forwarding 190:16 found 120:1 foundation 24:12, 27:13, 27:22, 29:6, 33:14, 34:16, 36:19, 37:19, 38:17, 39:12,</p>	<p>40:5, 40:21, 42:20, 45:4, 48:1, 48:11, 48:19, 49:9, 49:22, 51:13, 52:11, 56:10, 57:1, 57:9, 57:22, 58:22, 62:1, 63:8, 63:21, 66:17, 68:12, 70:13, 71:10, 72:11, 81:8, 81:19, 82:18, 85:17, 89:3, 89:14, 90:2, 92:10, 94:6, 94:18, 96:22, 97:22, 98:10, 98:20, 103:5, 105:3, 105:13, 108:22, 111:10, 113:17, 125:22, 131:16, 143:6, 144:18, 145:15, 151:21, 155:2, 158:1, 161:18, 168:12, 170:15, 177:8, 180:14, 181:15, 184:15, 185:1, 193:17 four 14:17, 25:22, 32:3 fourth 37:9, 37:12, 153:22 frame 34:14, 134:21, 180:19 frames 206:14 franco 103:3 frankly 27:1 free 62:14</p>	<p>freudian 164:18 front 169:1 frustration 125:17 fucker 149:10 fucking 110:13, 124:5, 124:18, 124:19, 149:9 fueled 35:14, 35:18, 37:13, 45:1, 45:13, 45:14 full 9:14, 71:5 fully 60:18 fun 208:14 function 29:18, 30:2, 61:10 fund 191:14 fundamental 161:11, 162:2, 162:16 further 210:14</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>gather 112:4 general 112:15, 195:14, 203:4, 203:21 generalizing 204:15 generally 10:22, 32:9 getting 46:7, 103:11, 177:12, 180:12, 181:6 ginger 190:10, 191:9</p>	<p>give 16:5, 64:1, 64:7, 64:8, 64:11, 147:18, 170:19, 180:16, 195:14, 204:20, 205:2, 207:5 given 111:3, 210:18 giving 162:13, 203:21 go 11:22, 12:20, 32:9, 51:3, 54:6, 54:7, 64:22, 88:11, 88:15, 101:11, 101:15, 102:8, 114:18, 115:6, 116:4, 116:5, 116:8, 116:11, 116:16, 117:18, 126:5, 129:21, 133:5, 140:6, 147:21, 153:3, 169:14, 179:12, 208:20 goddamn 124:17 goes 37:7, 39:2, 42:4, 42:9, 64:10, 84:13, 85:22, 91:17, 96:6, 97:8, 110:22, 124:4, 133:21, 138:3, 144:4, 146:20, 160:3, 161:9, 163:18, 182:14 going 12:4, 13:13, 15:9, 17:7, 21:14, 22:10, 29:10, 29:12, 32:6, 34:4, 44:2, 54:13, 59:12, 61:3,</p>
---	--	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Christi Dembrowski
Conducted on February 22, 2022

224

61:8, 61:17, 62:21, 64:15, 67:1, 85:6, 87:22, 88:4, 88:8, 92:1, 97:15, 104:18, 107:21, 112:21, 115:12, 115:13, 116:17, 117:1, 117:7, 117:12, 118:11, 119:6, 119:10, 126:5, 128:14, 128:19, 129:11, 130:10, 136:11, 137:4, 139:4, 147:10, 148:8, 148:9, 148:22, 149:4, 150:4, 155:5, 156:15, 157:16, 165:16, 165:18, 167:2, 167:3, 168:16, 169:14, 169:17, 170:19, 173:22, 177:21, 181:18, 183:15, 185:5, 190:3, 191:15, 205:21, 206:2, 206:11	great 95:2, 133:18, 137:16 gross 186:2 grounds 15:11 group 5:5, 196:14 guess 17:9, 44:3, 136:12, 150:9 guys 34:4, 46:13	8:17, 9:12, 26:4, 27:7, 27:9, 33:9, 33:19, 35:16, 38:12, 39:2, 43:8, 48:16, 49:20, 51:9, 52:8, 52:16, 52:18, 61:20, 62:8, 71:4, 74:9, 88:22, 108:5, 108:6, 116:18, 123:15, 124:9, 125:11, 134:6, 139:3, 146:1, 206:18	143:6, 144:18, 145:6, 145:14, 146:6, 146:15, 147:5, 153:17, 154:7, 155:2, 157:9, 158:21, 159:10, 159:20, 160:12, 161:4, 162:5, 162:21, 171:6, 171:19, 172:17, 177:9, 178:22, 180:14, 184:16, 186:13, 188:13, 189:20, 192:11, 199:19, 207:3
148:8, 148:9, 148:22, 149:4, 150:4, 155:5, 156:15, 157:16, 165:16, 165:18, 167:2, 167:3, 168:16, 169:14, 169:17, 170:19, 173:22, 177:21, 181:18, 183:15, 185:5, 190:3, 191:15, 205:21, 206:2, 206:11	H		
37:9, 206:17	hac 3:18	hearsay 35:20, 36:7, 36:20, 37:19, 38:5, 38:16, 39:12, 40:4, 40:20, 41:12, 42:1, 42:19, 43:14, 43:22, 45:4, 45:17, 47:4, 47:12, 48:1, 48:19, 49:10, 50:1, 51:12, 52:11, 53:19, 65:19, 66:4, 67:5, 67:14, 68:11, 68:12, 69:1, 69:13, 70:14, 71:9, 76:19, 77:12, 77:20, 79:14, 81:8, 82:19, 84:21, 85:17, 86:13, 94:19, 96:2, 96:20, 99:13, 102:2, 103:5, 106:12, 107:8, 108:21, 111:11, 113:17, 114:7, 125:21, 131:17, 132:2, 133:11, 134:8, 141:2,	heart 107:2, 107:5, 108:10 heartbroken 143:14 heaven 95:2 hedonistic 164:19 help 42:10, 48:9, 53:9, 53:16, 54:5, 65:17, 66:13, 66:20, 69:19, 74:15, 75:2, 75:16, 76:13, 83:17, 83:20, 84:6, 101:15, 101:16, 102:4, 108:1, 122:11, 123:20, 138:1, 140:4, 141:16, 142:2, 162:10, 204:2 helped 162:12 helpful 65:2, 84:10, 91:6 helping 131:3 helps 32:7, 119:21
9:10, 27:2, 48:6, 99:6, 99:7, 99:11, 133:22	half 56:17, 167:14		
goodness 118:10	halton 5:13, 8:9		
governed 15:6	hand 58:15, 155:13, 155:20, 210:18		
gracious 118:10	happen 143:21		
grand 186:2	happened 53:15, 93:19, 160:5		
grasp 71:6	happy 84:15, 142:22		
gratification 164:3	harassing 60:20, 112:12, 113:3, 148:15		
	hard 75:3		
	hate 80:22		
	head 18:1, 18:8, 71:2, 71:22		
	headlines 202:2		
	healthy 138:4		
	heard 1:8, 8:5, 8:15,		

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

225

<p>here 8:2, 12:1, 32:8, 87:6, 89:7, 91:1, 93:3, 94:3, 108:16, 110:11, 114:16, 117:1, 129:22, 134:22, 136:2, 146:10 here's 11:16 hereby 210:7 hergott 10:15, 10:19, 11:19 hi 150:18 hiccup 96:9 hicksville 195:4 high 22:1, 92:7, 170:12 highly 205:6, 206:3 himself 42:6, 67:1, 97:15, 172:2, 172:22, 173:7, 173:18 hired 162:10, 162:18 hit 107:4 hits 96:10 hole 144:6 holloway 5:6 hollywood 5:7 home 9:20, 70:3 honest 37:22, 183:13</p>	<p>honestly 46:2 hope 91:17, 108:3, 137:16 hopefully 139:5, 178:15, 179:12 hoping 46:13, 46:20 hotel 85:4, 85:7 hour 165:19 hours 46:8, 84:17, 104:17, 117:1, 117:2, 174:17, 176:5 house 150:19, 159:7, 159:16 howell 199:17, 199:18 human 60:6 hurt 67:1, 106:19, 107:4, 108:10, 155:13, 155:20 hurting 108:8, 108:9 husband's 20:20</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>ice 102:22, 113:8 id 163:19, 164:9, 164:11, 164:18, 165:10 idea 99:6, 99:7, 99:11, 99:14, 198:18, 201:21, 202:1 ideas 22:10</p>	<p>identification 12:7, 29:13, 54:15, 61:5, 88:2, 115:15, 156:18, 167:5, 168:19, 174:2, 178:1, 181:20, 183:17, 185:7, 187:11, 188:21, 190:5 identified 149:6 identify 8:12, 126:16 ii 1:4, 8:4, 8:19 illinois 3:21 imagine 53:4, 143:19 immediate 163:21, 164:3 immediately 189:14, 189:18, 190:1 important 138:2, 138:3 impossible 86:4 improper 200:21 improving 173:9 inappropriate 205:6, 206:5 inappropriately 206:4 incident 89:20, 90:5, 91:11, 92:16, 93:1, 93:2, 98:6, 98:16, 106:2, 138:9 incidents 92:6 include 60:10 includes 97:14, 116:2</p>	<p>income 19:8 incorrect 199:22 indicate 129:3 indicated 141:15, 167:21 inescapable 143:19 infinitum 15:20, 16:17, 17:3, 19:6, 19:9, 19:13, 22:5, 23:16, 23:22, 24:9, 24:16, 25:13, 55:22, 58:13, 58:14, 58:16, 58:17, 58:19, 59:8, 176:17 influence 40:2, 40:18, 95:8, 96:16, 106:10, 133:22 information 99:9, 99:10, 101:16, 102:5, 199:21, 204:4, 204:6 informed 159:7 injury 153:4, 153:8 inquire 55:11 inquiry 118:16 insist 117:7 instance 141:21 instant 164:3, 204:17 instead 67:18, 68:16 instruct 15:4, 15:7,</p>
--	---	--	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Christi Dembrowski
Conducted on February 22, 2022

226

15:10, 21:14, 59:15 interested 25:11, 210:16 interests 19:12, 19:13, 19:21, 20:1 internet 13:11 interpose 16:12, 180:8 interpretation 86:15, 112:19 interpreting 203:22 interrupt 49:14, 51:2 interrupted 205:22 intervene 66:13 introduced 98:15 invoice 167:10, 167:17 involve 22:22 involved 25:1, 53:13, 83:19, 84:5, 105:19, 167:22, 168:1, 190:13, 191:10, 194:22 involvement 11:2, 11:18 involving 89:20 irrelevant 118:14 irvine 3:6 ish 170:20 island 91:21, 92:5 issue 27:19, 38:3, 59:18, 95:6,	95:17, 95:21, 96:9, 163:18, 177:15 issues 27:5, 34:21, 38:13, 42:14, 52:3, 53:5, 69:11, 82:15, 101:21, 161:11, 162:2, 162:16, 162:19, 163:5, 172:22, 177:3, 202:6 itself 45:6, 74:3, 108:19, 173:16 <hr/> J <hr/> jack 131:2, 153:4 jacobs 169:8, 169:20, 171:12, 174:13, 175:14, 178:8, 182:2, 182:8, 183:21, 185:11, 185:19, 187:15, 189:2, 190:10 james 103:3 january 168:7 jd 150:20 jefferson 4:15 jennifer 199:17, 199:18, 199:20 jerry 172:1, 172:5, 172:10, 172:19, 173:19, 175:17, 175:22, 176:1, 176:4 job 1:20, 19:10, 162:17, 193:15	joel 185:20, 187:16 john 1:4, 8:4, 8:19, 178:7, 179:17 johnny's 40:17, 59:20, 81:6, 121:13, 121:17, 133:8, 133:18, 152:2, 153:7, 157:6, 162:18, 180:3, 182:18, 192:9, 192:16, 200:13 joined 40:6 josh 9:11 joshua 4:12, 8:14 journey 160:7 jtreece@woodsrog- ers 4:18 july 123:6, 124:1 jump 42:5 <hr/> K <hr/> kathleen 3:17, 3:19 keenan 21:3, 191:18, 192:8, 192:13, 192:16, 193:2, 193:6 keep 39:13, 91:18, 107:21, 117:2, 158:5, 195:17 keeps 108:19 keith 34:11, 34:12, 34:18, 34:22, 45:12	key 18:15 kick 106:19, 108:9, 114:4 kicked 102:22, 106:9, 107:16, 113:9 kids 73:2, 73:5, 73:9, 73:19, 74:5, 76:12 kill 97:15, 110:13 killing 144:10, 145:11 kind 39:3, 41:8, 41:15, 86:5, 114:15, 174:7 kinds 114:16 kipper 98:7, 98:12, 98:15, 99:7, 105:10, 105:14, 138:13, 139:5, 139:16, 139:21, 140:21, 141:14, 141:16, 150:20, 157:2, 157:18, 159:4, 159:7, 159:11, 160:9, 160:16, 160:19, 161:2, 161:5, 163:10, 163:15, 163:17, 165:11, 167:11, 167:22 kipper's 157:6 kit 97:14 knew 76:6, 100:14, 109:18, 158:18, 199:22 knock 85:15
---	---	---	--

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

227

<p>knowledge 11:1, 41:6, 55:11, 56:7, 113:14, 113:20, 113:21, 134:5, 134:14, 166:9, 166:15, 166:22, 202:5, 202:13, 202:14, 205:3, 207:12, 207:18, 208:3 known 191:22 knows 117:19, 176:12, 205:10, 205:16 kristi 1:22, 2:10, 9:2, 210:2, 210:22</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>la 90:8 lack 24:12, 27:12, 27:21, 29:6, 31:20, 33:14, 34:16, 36:19, 37:19, 38:17, 39:11, 40:5, 40:21, 42:19, 45:4, 48:1, 48:11, 48:19, 49:9, 49:22, 51:13, 52:11, 56:10, 57:1, 57:9, 57:22, 58:22, 62:1, 63:8, 63:21, 68:12, 70:13, 71:10, 72:11, 81:8, 81:19, 82:18, 85:17, 89:3, 89:14, 90:1, 92:10, 94:6, 94:18, 97:22, 98:10,</p>	<p>98:20, 103:5, 105:3, 105:13, 108:22, 111:10, 113:17, 125:21, 131:16, 143:6, 144:18, 145:14, 151:21, 155:1, 158:1, 161:18, 168:12, 177:8, 180:14, 181:15, 184:15, 193:17 lacks 66:17, 96:21, 170:15, 185:1 large 210:1, 210:4 largely 174:8 last 95:14, 137:9, 150:22, 170:22, 172:1, 188:6, 195:10 late 16:12, 171:3, 172:2, 172:22, 173:10, 174:17, 176:5, 177:14, 177:19, 180:8 lateness 170:20, 171:8, 171:13, 171:17, 172:15, 173:9, 176:6 later 46:8, 59:17, 65:5, 122:3, 130:5, 207:6 laura 1:8, 8:5 law 5:5, 196:14 lawsuit 10:15, 10:18, 14:1 lawyers 154:17 lead 204:9</p>	<p>leads 203:8 least 68:5, 142:20, 176:5 leave 70:20, 70:21, 131:5, 159:7, 159:16 led 99:10 ledger 6:10, 55:4, 57:4 left 122:18, 124:18, 126:17 legal 11:19, 16:13, 18:10, 18:21, 20:11, 24:12, 25:6, 25:16, 28:18, 33:14, 44:13, 56:22, 57:21, 61:22, 63:7, 63:20, 181:14, 182:22, 187:3, 196:7, 201:6, 201:17, 204:12 length 62:12 lesher 178:8, 179:18 let's 37:6, 54:7, 90:20, 116:11, 140:6, 143:10, 204:19 letting 39:6 life 78:20, 80:18, 108:2, 133:5, 143:19, 143:21, 203:2 life's 143:18</p>	<p>liked 23:9, 40:14 likely 43:9 lily 132:22, 135:4 lily-rose 110:13, 130:22, 131:12 lily-rose's 134:6 line 76:20, 126:8, 127:11, 127:14, 128:22, 152:9, 152:10, 152:18, 152:21, 153:22, 155:7, 157:3, 159:5, 187:16, 189:4 lines 23:2, 84:14, 147:14, 147:15, 192:9, 192:16, 193:7 list 11:18, 204:22 listen 13:14 literally 84:14, 84:16, 133:17 litigation 9:12, 198:15, 199:6 little 37:1, 57:15, 76:9, 91:7, 119:11, 161:6, 168:17, 174:6 llc 58:17 llp 3:4, 3:11, 4:5 loaded 54:18 loan 56:16, 57:6,</p>
--	--	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

228

57:12, 57:18, 57:19, 58:12, 58:13, 58:15, 58:17, 184:4, 190:17, 190:21, 191:1, 191:5, 191:6 loans 58:18 located 210:6 lodge 16:8, 39:14, 44:12, 64:21, 65:4 lodged 64:3 london 85:4, 85:7, 86:6, 91:21, 92:6, 93:14, 93:19, 94:1, 94:4, 94:8, 94:11 long 25:13, 53:1, 105:6, 117:5, 160:4 longer 88:8 look 35:9, 48:4, 55:6, 56:14, 58:11, 61:18, 90:21, 106:17, 118:20, 123:21, 127:3, 128:1, 132:6, 136:2, 140:10, 150:7, 153:21, 158:8, 159:3, 162:14, 171:10, 174:11, 178:4, 182:1, 185:18, 190:8 looked 95:21, 132:18, 138:7, 146:2 looking 26:14, 63:18,	68:15, 100:17, 101:20, 121:7, 121:8, 122:10, 122:14, 125:9, 131:7, 132:9, 134:22, 204:3 los 89:11. lose 100:18, 100:19, 100:20, 101:12 losing 110:7, 146:18 lost 108:11, 143:15 lot 40:15, 40:16, 41:2, 80:18, 90:17, 94:11, 116:2 love 78:4, 83:5, 91:7, 100:18, 100:19, 102:4, 110:12, 143:16, 143:18, 144:4 loved 143:17 loves 66:22, 83:9, 101:13, 123:9 lucien 5:12 lunch 114:21 lunchtime 114:18 lw 174:19 <hr/> M <hr/> ma'am 166:3 mac 119:17 mad 75:4, 76:14, 76:15	made 108:4, 122:2, 127:11, 129:9, 204:20 mahnaz 55:13 main 87:11 mainly 13:8 make 13:8, 13:11, 13:14, 17:12, 73:9, 87:11, 115:20, 119:6, 119:11, 155:12, 182:15, 183:7, 200:12 makes 75:4, 86:3, 153:2 making 168:1, 188:8 man 144:5, 146:21, 190:10, 191:9 manager 186:1 manner 71:16, 117:22 manson 66:1, 73:8, 76:11, 80:17, 82:14, 83:1, 84:15 manson's 79:1, 79:2 many 22:16, 22:17, 22:19, 91:20, 91:22, 108:6, 143:11, 177:14, 192:1 march 33:9, 34:13, 47:10, 47:19, 48:16, 49:3, 49:6, 61:21,	62:8, 151:3, 152:14, 152:19, 154:11, 155:10, 187:16, 189:3, 190:11 marilyn 66:1, 79:1, 79:2 marilyn's 67:11, 67:20 mark 54:14, 93:15, 167:3, 168:16 marked 12:7, 29:11, 29:13, 54:15, 61:4, 61:5, 87:22, 88:2, 115:13, 115:15, 156:16, 156:18, 165:17, 167:5, 168:19, 174:1, 174:2, 177:21, 178:1, 181:18, 181:20, 183:16, 183:17, 185:6, 185:7, 187:9, 187:11, 188:20, 188:21, 190:4, 190:5 marks 189:15 married 20:18 matter 8:4 max 186:3 maybe 25:21, 25:22, 54:4, 83:12, 83:16, 119:20, 119:21, 158:8, 200:4 mean 21:8, 36:22, 37:2, 49:13, 51:2, 51:17,
--	---	---	--

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

229

<p>71:20, 76:9, 78:7, 81:22, 107:13, 112:7, 129:22, 158:6, 183:10, 199:10, 200:14, 204:1, 204:8, 205:5 meaning 31:12, 109:8, 109:10 means 41:15, 183:13 meant 142:2, 160:6 media 58:17 medical 99:21, 160:13, 162:22, 164:5 medication 28:12, 28:15, 157:13, 158:3, 158:6, 159:1, 160:17 medications 99:15, 99:19, 100:6 medicine 97:14 meds 96:7 meet 99:7, 103:13, 103:18, 104:17, 105:15, 106:6 mena 3:10, 8:20 mental 77:8 mentioning 92:5, 92:14 mentions 92:12 message 61:19, 67:14, 79:9, 82:13, 97:20, 107:20, 150:10, 150:13,</p>	<p>151:4, 174:7, 200:6, 206:20 messages 30:14, 32:1, 68:15, 76:3, 78:10, 118:12, 128:10, 128:15, 129:9, 129:13, 140:7, 142:1, 169:4, 196:5, 196:18, 197:4, 197:9, 197:11, 197:18, 197:19, 197:21, 206:18, 206:20 met 104:7 michelson 3:5 middle 150:7, 178:7 might 36:15, 52:2, 52:5, 53:9, 83:8, 126:16 million 56:17, 168:8, 182:15, 183:7, 189:13, 189:17, 190:1 mind 53:6, 53:9, 53:11, 71:1, 71:21, 104:14, 136:17, 165:19, 187:22 minus 119:16 minute 137:6 minutes 115:2 mischaracterizes 135:13, 136:7, 136:21, 207:2 mischaracterizing 204:1 misread 149:11</p>	<p>misstates 40:19, 42:18, 60:20, 67:5, 67:13, 69:3, 70:12, 71:8, 73:12, 73:21, 74:17, 75:6, 76:18, 77:10, 77:11, 79:13, 81:8, 84:1, 86:11, 96:3, 96:18, 102:2, 103:20, 106:20, 107:7, 108:12, 108:20, 109:15, 111:11, 111:18, 114:5, 114:6, 127:7, 138:15, 141:1, 143:5, 146:4, 146:5, 155:21, 155:22, 156:11, 157:9, 159:19, 161:16, 162:4, 162:20, 163:12, 167:16, 168:2, 177:8, 179:20, 185:14, 186:12, 189:6, 202:8, 207:1, 207:16 misunderstood 141:6 moment 24:2, 29:12, 31:5, 31:9, 51:6, 77:15, 91:2, 104:15, 161:6, 208:7 moments 48:6 monday 175:13 money 184:13, 184:21, 187:1, 188:10 monitor 8:8 months 92:2, 94:13</p>	<p>more 17:21, 64:4, 78:18, 110:6, 111:4, 112:1, 112:17, 128:3, 134:11, 143:16, 153:2, 158:15, 163:4, 163:5, 180:1, 181:6, 186:20, 208:7 morning 9:10, 104:19 mortdecai 176:7 mostly 11:17 mother 149:10 move 12:4, 21:16, 39:1, 54:4, 130:1 moving 46:8 much 59:7, 67:1, 111:2, 112:17, 129:16, 133:2, 137:21, 145:19, 150:18, 153:1 multitude 25:4 music 58:17, 186:1, 186:7, 186:22, 192:13, 193:3 must 111:2, 189:11 muted 32:14 myself 122:9, 164:7</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 9:11, 9:14, 15:19, 20:20, 56:16</p>
--	---	---	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

230

<p>names 14:21 narrative 26:21, 50:17, 52:10, 53:18, 203:14 native 61:10 natively 30:11 nature 10:21 nazee 55:13, 55:20 nd 8:7, 33:9, 47:10, 47:19, 48:16, 49:3, 49:6 necessarily 17:21, 18:14, 23:6, 41:4, 53:22, 87:3, 100:14, 130:14, 201:22, 203:18 necessary 88:9 need 11:21, 14:20, 15:2, 30:16, 40:12, 44:12, 47:21, 63:13, 80:13, 100:20, 102:5, 106:18, 107:4, 108:9, 116:16, 117:17, 118:15, 119:18, 122:4, 124:5, 124:18, 128:20, 130:4, 148:8, 153:4, 158:14, 158:15, 165:2, 180:8, 185:21, 185:22, 186:7, 189:13, 189:17, 205:18 needed 65:6, 75:16,</p>	<p>101:3, 146:3, 186:8, 187:1, 188:10, 193:3 needing 80:8, 183:7, 190:21, 191:1 needs 17:3, 21:17, 65:16, 70:3, 75:2, 76:13, 80:5, 101:15, 109:13, 110:13, 116:20, 117:6, 117:16, 129:8, 172:3, 173:1, 173:7, 176:12, 177:2, 182:14 never 13:9, 29:7, 57:12, 98:2 new 3:13, 97:15 newell 5:12 next 43:7, 102:8, 114:18, 119:4, 121:7, 123:21, 132:7, 132:12, 132:13, 132:14, 161:10 night 170:22 nihil 15:20, 16:17, 17:3, 19:6, 19:9, 22:5, 24:1, 24:9, 25:14, 55:22, 58:14, 58:16, 58:17, 59:8, 176:17 nihil's 19:13, 23:16 none 116:22, 203:2, 206:14 nonstop 84:16</p>	<p>norfolk 210:19 normal 78:20 notarial 210:18 notary 2:11, 210:3 notes 30:2 nothing 35:12, 41:17, 209:2 notice 2:10, 162:17, 201:13, 201:14 noticed 200:18, 201:2 number 8:2, 8:6, 22:17, 25:20, 25:21, 31:6, 31:18, 31:21, 46:6, 83:16, 100:17, 118:22, 119:3, 119:4, 120:5, 120:9, 120:11, 120:13, 122:15, 122:18, 122:21, 124:1, 126:6, 126:8, 126:15, 126:16, 127:4, 127:15, 127:20, 131:9, 132:8, 132:14, 137:5, 137:7, 138:22, 140:10, 140:11, 142:7, 150:8, 152:4, 152:18, 154:1, 155:7, 189:14 numbered 31:10, 127:9, 169:18 numbers 31:21, 132:11 numerous 126:14, 127:9</p>	<p>nurse 157:19 nw 4:6 <hr/> O <hr/> oath 210:9 object 116:17 objected 118:8, 118:9 objecting 16:3 objection 11:3, 13:3, 14:2, 14:19, 15:7, 16:2, 16:13, 17:4, 18:5, 18:20, 19:14, 20:3, 20:11, 21:4, 22:15, 23:3, 23:18, 24:5, 24:11, 25:6, 25:16, 26:5, 26:6, 26:19, 26:20, 26:22, 27:11, 27:20, 28:17, 29:3, 32:17, 33:11, 33:13, 34:7, 34:15, 35:2, 35:19, 36:6, 36:18, 37:15, 37:16, 38:4, 38:15, 39:9, 40:3, 40:19, 41:10, 41:21, 42:18, 43:13, 43:20, 44:11, 44:12, 45:3, 45:15, 45:22, 46:17, 47:3, 47:11, 47:22, 48:10, 48:18, 49:8, 49:21, 50:16, 51:11,</p>
---	---	---	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

231

52:9, 53:17, 56:1, 56:9, 56:21, 57:8, 57:21, 58:7, 58:21, 60:2, 60:12, 60:19, 61:22, 63:7, 63:20, 64:2, 64:8, 64:12, 64:13, 64:21, 65:1, 65:18, 66:3, 66:15, 67:4, 67:13, 68:1, 68:10, 68:22, 69:12, 69:16, 69:21, 70:11, 71:8, 71:12, 72:1, 72:10, 73:11, 73:21, 74:16, 75:6, 75:11, 75:17, 76:4, 76:17, 77:10, 77:19, 78:11, 78:16, 79:3, 79:13, 80:10, 81:7, 81:18, 82:17, 83:10, 83:22, 84:20, 85:8, 85:16, 86:10, 86:20, 87:18, 89:2, 89:13, 89:22, 90:10, 90:14, 91:13, 92:9, 92:17, 93:4, 93:8, 93:20, 94:5, 94:17, 95:9, 96:1, 96:18, 97:4, 97:21, 98:9, 98:19, 99:4, 99:12, 99:20, 100:7, 101:4, 102:1, 102:16, 103:4, 103:20, 104:4, 104:9, 105:2, 105:12,	105:21, 106:11, 106:20, 107:6, 107:18, 108:12, 108:20, 109:20, 110:17, 111:9, 111:18, 112:11, 113:2, 113:15, 114:5, 120:22, 121:19, 123:17, 124:10, 125:3, 125:12, 125:20, 127:7, 127:17, 128:6, 129:6, 130:12, 130:14, 131:15, 132:1, 133:10, 133:16, 134:7, 134:16, 135:12, 136:7, 136:21, 138:15, 139:11, 139:22, 140:13, 141:1, 141:17, 142:16, 143:4, 144:17, 145:13, 146:4, 146:14, 147:4, 147:16, 148:10, 148:15, 149:1, 149:11, 149:15, 149:22, 150:15, 151:8, 151:9, 151:18, 153:9, 153:16, 154:6, 154:14, 154:22, 155:21, 156:9, 157:8, 157:22, 158:12, 158:20, 159:9, 159:18, 160:11, 161:3, 161:16, 162:4, 162:20, 163:11, 164:4, 164:13, 164:20, 165:12, 166:11, 166:18, 168:2, 168:10, 170:2, 170:13, 171:5, 171:18, 172:6, 172:16, 173:2, 173:11,	173:14, 175:5, 175:19, 177:7, 177:16, 178:21, 179:9, 179:19, 180:5, 180:9, 180:13, 180:21, 181:7, 181:14, 182:20, 184:6, 184:14, 184:22, 185:13, 186:11, 187:2, 187:18, 188:12, 189:5, 189:19, 191:2, 191:12, 192:3, 192:10, 193:8, 193:16, 194:11, 194:18, 195:5, 195:15, 196:6, 197:6, 198:2, 198:9, 198:16, 198:22, 199:7, 200:8, 200:20, 201:16, 202:7, 202:16, 203:10, 204:11, 205:4, 207:1, 207:15 objections 11:10, 16:8, 16:19, 17:5, 17:6, 17:16, 21:6, 21:13, 28:6, 33:21, 39:14, 39:15, 39:16, 39:18, 44:2, 44:19, 52:20, 64:3, 65:2, 65:13, 72:18, 82:5, 84:8, 93:10, 136:10, 194:4, 196:9, 196:10, 196:20, 201:5, 205:22, 206:2 obviously 60:10, 150:21, 190:18 occasionally 36:10, 50:7,	95:18, 195:16 occupation 15:17 october 126:9, 127:6, 127:16, 128:5, 128:17, 129:4, 130:8 offer 76:12, 84:5 offering 83:19, 91:4 office 74:9 official 22:6 often 37:3, 195:13 oh 10:5, 31:19, 57:17, 109:16, 123:4, 126:12, 153:1, 165:3, 201:1 okay 9:20, 10:6, 11:21, 12:20, 13:7, 16:7, 16:11, 19:20, 23:13, 23:15, 29:21, 30:1, 30:9, 30:12, 30:18, 31:2, 32:2, 39:19, 49:16, 54:20, 61:12, 61:14, 63:16, 71:19, 87:10, 87:11, 103:15, 103:16, 109:18, 112:14, 115:4, 119:20, 120:3, 120:5, 122:14, 126:21, 127:2, 128:11, 128:19, 130:3, 130:6, 130:21, 131:8, 132:17, 132:19, 137:8,
---	---	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski

Conducted on February 22, 2022

232

<p>137:19, 139:1, 140:8, 141:14, 142:11, 149:5, 150:5, 150:6, 153:3, 155:19, 156:22, 169:6, 174:10, 176:19, 180:11, 182:6, 205:12 old 121:15, 121:17, 121:21 once 10:5, 66:7 one 8:3, 28:2, 28:11, 32:13, 37:8, 50:14, 51:5, 102:13, 104:2, 104:7, 108:1, 118:3, 120:2, 121:13, 121:17, 122:8, 126:22, 132:18, 135:18, 135:19, 135:20, 136:5, 143:17, 153:22, 167:14, 169:2, 169:4, 174:5, 178:5, 178:6, 186:1, 186:9, 208:2 one-page 167:10 ones 116:6, 116:9, 135:3 ongoing 95:6, 95:17, 95:20 only 39:2, 39:6, 39:22, 40:16, 41:7, 54:21, 102:13, 114:3, 125:10, 143:21, 144:3 open 31:1, 54:19,</p>	<p>77:22 opinion 28:9, 99:21, 100:3, 100:4, 100:5, 160:13, 162:22, 164:5, 166:21, 200:21 opportunity 25:1 opposed 78:20, 112:18, 186:21 option 88:11 options 179:5 order 168:8 orientation 122:8 other 10:3, 19:5, 19:8, 19:9, 20:9, 23:11, 50:12, 72:5, 88:11, 97:11, 106:3, 125:18, 135:21, 136:10, 144:5, 148:7, 189:6, 208:2 others 22:9, 183:21, 185:20, 207:6 otherwise 23:10, 210:15, 210:16 out 36:15, 37:3, 53:6, 53:9, 53:15, 66:12, 66:18, 68:7, 68:20, 69:10, 74:20, 77:14, 85:13, 89:7, 90:21, 91:1, 92:8, 94:11, 94:15, 104:14, 105:17, 105:18,</p>	<p>111:8, 113:11, 113:14, 114:13, 117:20, 119:16, 120:3, 136:17, 137:1, 140:18, 141:16, 142:21, 148:9, 148:21, 148:22, 157:17, 176:7, 191:16, 199:13, 200:2, 201:9, 203:6, 203:20, 205:16 outlines 38:13 over 12:4, 22:17, 46:21, 50:3, 58:15, 60:1, 60:7, 91:20, 105:11, 108:19, 118:14, 123:1, 125:17, 150:22, 206:13 overall 164:7 overbroad 204:22 overdramatic 98:4 overly 207:3 oversee 22:9, 22:10 own 29:20, 71:1, 71:21 owned 15:21 owns 20:1, 20:16 <hr/>P<hr/>page 6:3, 6:8, 7:3, 31:17, 31:18, 31:21, 43:6, 43:7, 46:6, 56:15, 87:5,</p>	<p>102:8, 103:16, 118:21, 122:8, 122:13, 122:15, 126:5, 126:12, 126:15, 126:19, 126:20, 126:22, 127:9, 128:3, 128:18, 130:8, 130:17, 131:8, 132:7, 132:11, 132:12, 132:13, 132:14, 132:15, 132:16, 137:5, 137:7, 137:8, 137:10, 138:21, 140:7, 142:6, 142:8, 149:4, 150:4, 150:8, 152:3, 155:6, 161:10, 169:2, 169:4, 169:5, 169:18, 171:10, 174:5, 174:8, 174:9 pages 1:21, 30:14, 32:4, 54:22, 117:5, 167:12 paid 20:2, 59:7, 168:1, 168:6, 194:17 paragraph 160:20, 176:20 parentheses 91:21 park 195:4 parkway 3:20 part 108:18, 144:5, 144:9, 144:14, 193:10 participant 119:1 participants 8:11, 128:21</p>
---	--	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

233

<p>particular 53:8, 78:13, 105:18, 175:22 party 194:2, 210:15 pass 119:18 passages 117:10 passing 85:13 patience 163:18 patterns 107:22 paul 85:14 pay 178:16, 193:13, 194:21 payable 6:16 paying 194:1, 194:2, 194:6 payment 6:10, 55:4, 56:6, 56:8, 195:1 payments 194:9, 195:3 pc 3:19 pdf 61:10, 126:21, 127:1 people 189:6, 203:17 perfect 95:2 performer 23:1 period 118:14, 168:7 person 35:13, 35:17, 86:2, 86:9, 96:12, 125:10,</p>	<p>183:22 personal 41:6, 134:5, 134:14, 166:8, 166:15, 166:22, 190:17, 202:5, 202:13, 202:14, 205:2, 207:12, 207:17 personally 40:14, 95:17 pessimistic 160:21 pharmaceutical 97:12 phone 118:22, 119:3, 122:18, 122:21, 200:3 photo 124:17 phrasing 65:3 physical 110:8, 166:9 physically 107:4, 210:6 picture 160:9 pills 135:7, 135:20, 158:10 pin 201:12 pirates 169:8, 172:11, 174:16 place 87:12 plaintiff 1:5, 1:10, 3:2, 4:3 plane 89:20, 98:6, 98:16, 113:7, 113:21, 138:8 planet 8:10, 9:2</p>	<p>played 192:13, 193:2 player 18:15 plc 4:14 pleasant 124:4 please 8:12, 9:3, 39:15, 95:14, 118:9, 141:9, 169:10, 189:14, 205:19, 206:7 plus 80:16, 119:14 point 28:2, 28:4, 64:22, 77:6, 78:22, 88:7, 93:15, 95:2, 107:15, 117:20, 118:11, 200:19, 201:4, 206:5 pointed 135:10, 135:15 poor 153:1 position 59:7, 92:3 positive 131:4 postnuptial 154:4, 154:12, 154:20 potential 24:22, 64:16 potentially 40:8, 64:19, 64:20, 66:13, 68:13, 196:7 precipitated 47:1 preclude 62:20 prefer 55:1 preferable 29:21</p>	<p>preference 29:16 prenuptial 153:14 preparation 13:19 prepare 13:2, 13:15 prescription 28:12, 28:15, 96:7, 158:8, 159:1 present 5:11, 102:18 presented 98:3 president 22:7, 22:8 press 119:14 pretty 135:10, 170:12 previously 108:17, 158:6, 158:9 prior 40:19, 48:15, 49:6, 60:21, 68:20, 69:3, 69:8, 70:12, 73:12, 73:22, 75:7, 77:10, 114:5, 136:8, 136:22, 138:15, 146:5, 155:22, 159:19, 161:16, 163:9, 163:12, 168:3, 202:8, 207:16 privacy 14:20, 15:6, 15:11, 21:5, 21:13 private 59:11 privilege 196:8 pro 3:18</p>
--	---	---	---

CONFIDENTIAL

Transcript of Christi Dembrowski

Conducted on February 22, 2022

234

<p>probably 63:2, 87:6</p> <p>problem 96:10, 115:1, 131:3, 168:18, 170:21, 175:13, 182:6, 207:7</p> <p>problems 28:5, 162:14</p> <p>proceed 118:18</p> <p>proceeding 210:16</p> <p>process 13:10, 184:4</p> <p>procure 184:4</p> <p>produce 118:4</p> <p>produced 55:5, 117:21</p> <p>producer 172:13, 172:14</p> <p>production 15:18, 15:19, 15:21, 16:17, 22:3, 22:11, 116:1, 122:3</p> <p>project 25:1, 25:4, 25:10, 191:6, 191:8, 191:11, 193:15</p> <p>projects 11:18, 22:10, 22:12, 22:14, 22:16, 22:21, 23:7, 24:22, 25:3, 25:5, 25:11</p> <p>promise 108:6</p> <p>promised 86:5, 86:6</p> <p>prompted 105:18</p> <p>pronounce 25:14</p>	<p>properties 104:2, 104:8</p> <p>property 193:14, 194:1, 194:2, 194:6, 194:9, 195:3</p> <p>proposals 88:14</p> <p>protective 60:1, 60:7, 60:16</p> <p>protocol 208:20</p> <p>provide 52:6, 196:4, 196:16, 196:18, 196:22, 197:12, 197:15, 197:20, 204:5</p> <p>provided 196:15, 197:1, 197:5</p> <p>provides 143:2, 162:17</p> <p>providing 117:4, 197:14</p> <p>ps 174:14</p> <p>public 2:11, 210:3</p> <p>publication 201:15</p> <p>pull 156:16</p> <p>purporting 40:9</p> <p>pursuant 2:10, 12:2</p> <p>pushed 159:6, 159:16</p> <p>put 12:16, 111:2, 115:13</p> <p>putting 58:15</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualification 210:4</p>	<p>question 11:14, 11:16, 13:14, 17:9, 19:18, 21:17, 26:9, 32:10, 39:20, 52:16, 57:16, 59:13, 64:10, 65:8, 65:9, 73:15, 77:2, 77:4, 84:3, 93:15, 95:14, 129:9, 134:12, 141:6, 141:9, 148:1, 148:2, 165:5, 165:7, 170:21, 181:3, 187:22, 192:15, 196:12, 202:11, 206:7</p> <p>questioning 76:20</p> <p>questions 16:4, 30:17, 62:16, 64:2, 64:12, 64:14, 64:22, 65:3, 117:10, 196:12, 208:7, 208:8</p> <p>quick 54:7</p> <p>quickly 130:1</p> <p>quiet 118:7, 118:8</p> <p>quite 28:13, 163:20</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>rage 67:11, 67:21, 68:8, 73:8, 94:15, 108:18, 109:6</p> <p>raise 184:21</p> <p>raised 82:15</p> <p>range 31:10</p>	<p>reach 36:15, 89:7, 90:21, 105:18, 148:21, 199:13, 200:2, 204:4</p> <p>reached 37:3, 68:20, 69:10, 91:1, 114:13, 141:15</p> <p>reaches 68:7</p> <p>reaching 66:12, 66:18, 74:20, 77:14</p> <p>reactions 163:20</p> <p>read 33:2, 62:6, 62:11, 62:14, 63:11, 63:13, 63:14, 63:16, 75:21, 88:5, 95:13, 95:15, 116:4, 116:7, 116:10, 117:11, 124:16, 141:9, 141:10, 143:3, 143:8, 169:11, 173:4, 192:8, 192:16, 193:6, 205:19, 206:7, 206:9</p> <p>reading 32:20, 62:3, 109:9, 112:21, 127:10, 135:3, 142:22, 169:16, 182:5, 187:21</p> <p>ready 156:21</p> <p>real 175:13</p> <p>reality 71:6</p> <p>realize 67:18, 107:13, 168:17</p> <p>realized 199:21</p>
--	---	--	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

235

<p>really 13:16, 14:4, 19:17, 39:7, 40:1, 53:22, 72:4, 79:18, 86:4, 98:2, 112:8, 124:18, 165:6, 165:14, 181:2, 185:21, 199:8, 199:10, 203:4 reason 35:12, 43:4, 70:4, 76:1, 99:1, 99:3, 105:18, 106:3, 136:3, 139:19, 140:3, 140:17, 148:21, 155:19 reasoning 41:4, 92:13 reassure 83:8 rebut 41:7, 207:20 received 38:2, 38:8, 38:11, 63:5, 63:19, 65:11, 78:9, 157:2, 195:20 recess 54:10, 88:18, 115:9, 116:14, 166:5 recognize 12:13, 12:17 recollection 33:7, 45:20, 52:1, 54:5, 91:10, 107:14, 138:10, 139:15, 142:2 recommend 61:9 record 9:14, 44:16, 54:8, 54:9,</p>	<p>54:11, 88:12, 88:13, 88:16, 88:17, 88:19, 95:15, 115:6, 115:8, 115:10, 116:5, 116:12, 116:13, 116:15, 116:18, 116:20, 117:3, 117:8, 117:13, 117:18, 117:21, 118:9, 128:13, 129:15, 129:18, 141:10, 166:4, 166:6, 205:22, 206:2, 206:9, 209:5 recorded 210:10 records 58:14 redline 189:11 reduced 210:11 refer 25:3, 43:12, 43:19, 56:8, 80:19, 120:19, 120:21, 125:1, 125:2, 125:7, 125:11, 175:22, 199:14 reference 31:22, 41:14, 56:16, 94:4, 102:19, 121:22, 157:12, 157:13, 167:11, 171:2, 173:8, 182:18, 200:6 referenced 50:12, 58:20, 95:18, 176:6 references 58:16, 129:1, 161:7 referencing 93:22, 179:3,</p>	<p>202:15, 204:10 referred 114:3, 138:8, 144:13 referring 24:20, 37:12, 37:22, 41:9, 46:15, 58:16, 79:21, 80:8, 80:13, 93:3, 94:8, 102:18, 112:2, 153:7, 161:10, 175:3, 175:10, 177:3, 177:11, 178:19 refers 34:6, 45:11, 45:21, 48:8, 56:20, 57:3, 58:6, 94:4, 104:2, 107:2, 110:16, 121:3, 121:5, 123:13, 123:15, 124:9, 127:21, 139:10, 164:18, 165:10, 171:16, 175:17 reflection 186:5 reflectively 163:19 reflexively 164:11 refrain 18:7, 27:7, 39:15 refresh 33:6, 91:10, 138:9, 139:15 regarding 158:2 reign 136:18 relate 118:1 related 136:5, 169:8, 210:14</p>	<p>relates 91:11 relating 52:18 relationship 21:2, 23:16, 24:1, 26:3, 26:13, 26:17, 27:3, 81:16, 82:1, 110:5, 112:5, 146:18, 154:19 relatively 200:17 relevance 14:19, 18:5, 18:11, 21:4, 57:11, 165:7 relevant 21:16, 59:11, 118:12, 118:16, 196:21 remains 143:18 remember 35:16, 36:1, 90:16, 91:22, 93:15, 93:18, 140:3, 146:8, 188:8 remind 44:2, 136:12 reminder 193:4 remote 13:9, 119:18 remotely 8:11, 9:19, 210:8 repeat 39:20, 65:9, 84:2, 107:22 repeating 108:19, 187:22 rephrase 193:22 replaces 146:21</p>
---	--	--	--

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

236

<p>reported 1:22 reporter 9:1, 9:3, 16:9, 95:13, 117:16, 117:18, 141:8, 205:19, 206:7 represent 8:13, 9:11, 55:3, 115:18 representing 8:10, 9:2 requested 95:15, 141:10, 206:9 residential 9:15 respect 17:2, 52:16, 56:7, 58:19, 69:10, 134:15, 142:18, 154:20, 157:5, 172:11, 174:16, 200:13 respectively 150:21 respond 34:2, 59:15, 73:1, 83:3, 91:5, 142:20, 171:22, 174:21, 176:10 responded 78:3 responding 30:17 responds 80:4, 80:21, 91:3, 104:16 response 45:1, 73:19, 101:19, 140:11 responsible 194:1 rest 87:12 restate 127:12</p>	<p>revealing 196:12 review 13:19, 29:20, 30:11, 30:15, 31:5, 31:9, 31:13, 62:21, 63:1, 88:9, 88:12, 88:16, 117:3, 117:7, 118:12, 118:14, 118:15, 128:10, 128:16, 128:19, 129:8, 129:15, 130:2 reviewed 13:22, 14:4, 73:18, 140:9 reviewing 38:14, 61:11, 62:21 richards 34:12, 34:19, 34:22, 45:12 richardt@aol 121:11 rid 101:3 rights 184:12 road 9:17, 11:22 roanoke 4:16 rogers 4:14 role 22:5, 23:8, 170:6, 172:10 romanticizes 160:22, 162:15 room 85:4, 85:7 rosa 9:17 rottenborn 4:13, 8:17 roughly 56:17</p>	<p>rows 128:3, 128:4 rpr 1:22, 2:11, 210:2 rudnick 3:4, 3:11, 4:5, 8:19 rule 40:8, 42:20, 45:5, 59:1, 68:14, 71:11, 75:7, 82:19 ruled 59:10 rules 15:6 running 64:2, 64:8, 64:11, 64:13, 65:1, 65:2, 69:15, 71:12, 93:7, 93:8, 147:18</p> <p style="text-align: center;">S</p> <p>sad 34:3, 51:18, 153:2 said 59:15, 67:18, 81:12, 103:18, 109:6, 114:11, 114:12, 127:8, 142:9, 158:8, 158:10, 159:12, 172:2, 173:7, 175:12 same 11:10, 16:19, 17:5, 17:6, 17:16, 21:6, 21:13, 28:6, 33:21, 44:19, 52:16, 52:20, 65:13, 72:18, 82:5, 84:8, 92:3, 107:22,</p>	<p>108:6, 116:3, 124:1, 127:17, 194:4, 196:20, 201:5 santa 9:17 satisfaction 163:21, 164:3 savage 149:9 saw 32:15 say 20:7, 22:14, 32:15, 37:7, 40:15, 42:4, 42:9, 58:5, 70:17, 73:2, 73:17, 74:19, 79:18, 80:4, 80:17, 83:4, 83:16, 85:22, 87:6, 87:10, 91:17, 96:6, 97:8, 101:11, 101:15, 101:19, 103:12, 104:17, 104:18, 109:5, 111:1, 123:8, 124:4, 133:21, 137:16, 143:12, 143:13, 143:14, 144:4, 146:20, 147:10, 153:1, 153:3, 155:12, 155:16, 158:7, 160:3, 161:9, 163:18, 164:6, 172:1, 173:17, 174:22, 176:11, 179:22, 182:14, 199:18, 201:9, 208:19, 208:21 saying 10:16, 36:1, 44:6, 46:7, 46:13, 71:16, 78:3, 82:11,</p>
---	--	---	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

35186

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

237

<p>91:3, 91:5, 102:3, 106:18, 107:3, 108:4, 135:6, 135:19, 135:20, 136:20, 147:11, 158:5, 163:14, 169:21, 173:5, 173:19, 175:15, 182:3, 203:5 says 33:19, 34:3, 35:11, 43:8, 46:9, 48:5, 55:7, 55:12, 66:5, 66:7, 66:19, 67:9, 69:19, 70:3, 70:19, 71:21, 80:16, 85:2, 87:8, 87:9, 93:14, 95:2, 102:12, 103:12, 103:17, 104:17, 107:11, 107:21, 110:11, 111:21, 113:7, 120:8, 120:16, 122:8, 122:17, 124:3, 124:16, 126:22, 127:4, 127:14, 130:18, 131:1, 132:22, 139:4, 140:17, 141:12, 142:19, 143:11, 145:18, 149:9, 150:18, 159:5, 170:18, 171:12, 173:7, 174:16, 175:12, 176:4, 178:14, 179:11, 182:11, 185:20, 188:3, 189:11, 190:11, 190:16 scared 109:13, 109:18, 110:4, 110:6, 110:7, 110:8,</p>	<p>110:9, 111:2, 145:20, 146:3, 146:12, 146:17, 147:12 schedule 174:18 school 22:1, 22:4 scope 197:15 scott 178:8 screen 12:6, 12:11, 29:17, 29:22, 55:1, 61:8, 103:15, 115:14, 115:19, 115:21, 122:11, 156:17, 167:4 script 22:19 scroll 31:14, 130:17, 132:13, 138:20 scrolling 58:15, 122:9 seal 210:18 sean 169:21, 169:22, 170:6, 174:13, 174:16, 175:10 second 32:13, 35:10, 56:15, 68:5, 69:9, 116:22, 120:2, 139:2, 152:9, 160:20, 169:5, 169:17, 171:11, 174:8, 176:20 seconds 16:6, 34:3, 133:17 security 85:15, 190:17 seeing 119:12, 148:6</p>	<p>seem 112:9 seemed 37:1, 51:19 seems 79:15, 80:14, 81:2, 142:21, 175:22, 204:16 seen 29:7, 68:6, 97:9, 108:17, 129:13 selling 184:11, 184:12 send 76:11, 135:5, 135:6, 135:7, 135:18, 136:3, 152:18 sends 169:20 sense 110:8, 195:14 sent 44:8, 44:17, 44:22, 46:9, 74:8, 76:2, 104:21, 142:19, 145:2, 145:3, 149:14, 158:6, 158:9, 158:15, 178:11 sentiment 133:9 separate 135:18, 136:4 separately 150:21 september 182:9, 184:1, 210:6 serious 77:7 set 45:13, 65:1, 139:4, 139:20, 171:3, 178:20, 179:4, 179:13,</p>	<p>192:17 seven 117:2 shadow 144:6 share 12:5, 29:17, 61:8, 115:14, 156:17, 167:4 shit 96:10, 97:11 shoot 124:17 short 169:14 shots 17:2 should 30:6, 30:10, 94:1, 106:6, 110:11, 132:12 show 29:10, 29:22, 54:13, 61:3, 67:11, 67:18, 87:22, 88:8, 115:12, 118:4, 165:16, 167:2, 168:16, 173:22, 177:5, 177:21, 178:14, 179:7, 179:17, 181:18, 183:15, 185:5, 190:3 showing 171:3, 178:19, 187:9, 188:19 shows 117:13 siblings 14:8, 14:10, 60:8 sickness 144:1 side 12:15 signature-bi6ds 210:20</p>
--	--	--	--

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

238

<p>signed 189:13 similar 131:12, 133:9 simple 64:5, 64:7, 64:16 since 13:9, 131:2, 133:2, 200:15 single 187:14 sis 118:22, 119:4, 120:6 sister 14:12, 51:18 sit 91:1, 94:3, 117:1, 129:22, 136:2 situation 83:21, 84:6, 84:9, 203:17 skipping 139:6, 168:17 slapped 103:1, 113:8 slowly 46:7, 96:8 small 54:21 sober 47:21, 48:9, 97:13, 98:8, 102:13, 160:10 sobriety 160:5 solely 113:13 some 28:13, 43:9, 54:4, 55:6, 55:10, 66:13, 77:7, 88:7, 99:15, 112:16, 118:13, 149:9, 194:15, 199:21</p>	<p>somehow 83:17, 83:21 someone 100:12, 199:13 something 23:2, 23:8, 30:6, 32:15, 42:5, 76:7, 100:13, 120:1, 146:21, 201:22 sometime 49:15 sometimes 179:3 soon 87:9 sorry 13:7, 16:3, 16:11, 19:17, 21:8, 21:10, 24:3, 28:20, 31:8, 33:2, 33:12, 33:20, 34:3, 35:5, 39:19, 44:12, 51:2, 57:17, 59:9, 62:2, 62:10, 71:19, 84:2, 87:19, 91:4, 95:12, 98:11, 113:1, 119:7, 126:11, 132:10, 137:6, 141:5, 142:8, 150:2, 164:15, 165:3, 168:11, 180:7, 180:10, 182:5, 187:21, 193:20, 196:2, 198:12, 199:12, 201:2, 202:10 sorrys 111:3 sort 11:15, 85:3, 118:16, 195:14 source 113:14</p>	<p>sources 19:8 south 4:15 speak 84:11, 102:9, 112:10, 137:18, 140:17, 185:21, 195:13, 195:16, 198:6, 198:14, 198:20, 202:1, 206:12 speaking 39:13, 39:16, 150:20, 198:10, 198:18 speaks 45:6, 45:9, 74:2, 173:15 spec 37:17 specific 25:4, 25:10, 39:15, 53:12, 53:22, 72:5, 77:15, 89:16, 90:17, 93:12, 106:1, 107:14, 117:10, 134:18, 150:10, 163:9, 163:15, 204:3, 204:6, 204:17, 204:19, 205:1, 206:12 specifically 23:14, 33:4, 51:16, 59:5, 80:3, 82:8, 92:13, 94:7, 110:20, 121:8, 126:3, 137:2, 141:21, 185:2, 188:16, 194:5, 197:17, 197:18, 208:4 specifics 51:4, 51:5, 51:8, 52:5,</p>	<p>52:6, 52:14, 52:17, 52:22, 53:22, 112:15, 206:13 speculate 136:15 speed 129:21 speedball 97:12 spent 87:2, 160:4 spoke 36:10, 112:6, 112:8, 112:10, 137:18, 139:4, 158:3, 186:1, 195:10, 198:3 spoken 171:13, 171:16, 199:5 square 3:12 st 168:7 stabilize 184:4 stage 178:16, 179:2 stalwart 5:5, 196:14 stand 53:6, 53:9, 104:14, 105:17, 136:17, 137:1 start 152:9, 169:5, 169:17 starting 62:5, 180:19 starts 176:20 state 8:13, 9:13, 67:14, 70:22, 77:8, 79:15, 196:9, 205:21, 206:2</p>
---	---	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

35188

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

239

<p>stated 113:19 statement 203:5, 203:21 statements 135:10, 135:16, 148:8, 207:13 states 43:3, 68:17, 82:1 stating 74:9, 109:4, 109:6 stay 92:1 staying 91:19, 193:15 steals 146:20 stenotype 210:10 stephen 139:3, 150:14, 152:19, 155:9, 156:4 steve 144:5 still 15:2, 32:14, 40:12, 62:2, 83:9, 165:2 stop 135:6, 135:7, 135:19, 135:20, 136:4, 158:7, 158:8, 158:10, 160:21 straits 181:13, 182:19, 186:6 street 4:6, 4:15 strike 27:7, 63:2, 86:1, 120:15, 126:7, 142:12, 185:12, 190:22, 201:11, 204:7</p>	<p>string 127:21 struggle 147:19 studio 24:10, 24:22 stuff 118:14 subject 157:3, 159:5, 174:14, 178:9, 182:11, 187:16, 189:4 subpoena 6:9, 12:2, 12:17, 195:20 subsidiary 58:19 substantively 174:5 suffering 144:2, 180:4 suggest 156:5, 156:8 suggestion 191:15 suit 198:7, 198:15 suite 3:20, 4:6, 4:15 summarizes 26:16 sun 198:1, 198:7, 201:15 super 172:2 superego 164:10 support 207:18 supporting 91:19 supportive 111:5 suppose 17:20, 18:1, 19:2, 53:10</p>	<p>supposed 39:10, 178:20 sure 11:15, 13:8, 13:11, 13:14, 16:9, 43:8, 43:16, 70:20, 73:9, 75:12, 87:11, 98:2, 102:19, 114:20, 115:20, 119:8, 126:12, 129:15, 139:13, 150:18, 155:12, 155:13, 165:21, 168:1, 170:10, 172:8, 188:9, 195:12, 198:3, 200:12, 208:20 surprise 159:14, 159:22 surrounding 104:14, 135:22 swear 9:3 sweetzer 104:3, 104:8 sworn 9:6, 210:8</p> <p style="text-align: center;">T</p> <p>take 24:21, 25:2, 31:5, 31:9, 35:9, 48:4, 54:7, 56:14, 58:11, 59:16, 59:17, 61:18, 65:5, 67:2, 90:20, 106:17, 114:21, 116:20, 118:20, 127:3, 128:9, 129:14, 130:3, 132:6, 143:22, 144:3, 150:7, 153:21, 159:3, 174:11, 178:4, 182:1,</p>	<p>190:8 taken 10:1, 54:10, 88:18, 115:9, 116:14, 166:5 takes 94:15, 137:6 taking 28:13, 97:10, 99:16, 100:12, 116:18, 117:2, 157:14, 165:20, 208:14 talent 22:22, 23:11 talk 11:17, 36:4, 38:12, 55:10, 66:19, 72:16, 74:10, 74:14, 74:21, 76:7, 76:12, 78:1, 79:19, 80:2, 80:5, 80:8, 80:14, 83:20, 84:5, 87:6, 87:8, 89:7, 90:22, 91:7, 103:11, 103:18, 123:8, 197:22, 208:3, 208:4 talked 38:19, 82:10, 133:3, 138:12 talking 22:14, 35:16, 79:21, 83:17, 156:5, 175:9, 177:1, 190:17, 200:7 tape 117:2 taper 180:19 tapering 200:18, 201:4, 201:14, 201:22 team 11:19, 17:11,</p>
--	---	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

240

<p>17:14 technician 5:12, 119:17 tell 39:2, 40:16, 41:1, 84:13, 109:12, 109:13, 110:3, 122:7, 128:21, 146:3, 182:3, 182:12 telling 39:22, 45:1, 65:16, 70:7, 76:2, 76:10, 86:8, 86:14, 101:21, 106:8, 107:15, 146:1, 146:11, 154:12, 159:11, 162:2, 162:14 tells 66:22, 75:2, 76:13, 79:11, 94:12, 100:17, 160:19 template 174:7 term 31:20 terminated 154:19 terms 112:16, 128:15, 131:13, 164:18, 173:5 terrible 71:2 terrified 147:12 terrifying 146:22 testified 9:7 testify 60:17 testifying 76:19 testimony 10:21, 40:20,</p>	<p>60:21, 64:17, 64:20, 69:4, 70:12, 73:12, 73:22, 75:7, 77:11, 114:6, 136:8, 136:22, 138:16, 146:5, 155:22, 156:11, 159:19, 161:17, 163:12, 167:19, 168:3, 177:8, 200:13, 202:8, 204:2, 207:2, 207:16 texting 87:7 texts 6:11, 6:12, 6:13, 6:14, 34:2, 46:6, 112:16, 112:22, 116:3, 118:1, 125:10, 128:17, 129:4, 130:7, 135:18, 135:21, 136:4, 137:9, 137:12, 142:12, 142:13, 152:8, 152:13, 154:11, 158:7, 197:12 th 88:22, 89:12, 104:8, 105:1, 123:6, 124:1, 126:9, 127:6, 127:16, 128:5, 128:17, 129:4, 130:8, 137:10, 137:13, 138:7, 139:8, 139:21, 140:12, 142:13, 146:2, 157:2, 169:9, 169:21, 174:13, 174:21, 176:17, 178:8, 178:12, 184:1, 185:19, 190:11, 210:19</p>	<p>thank 23:15, 31:4, 62:17, 63:15, 91:4, 130:13, 130:15, 166:1, 206:8, 208:13, 208:18 thanks 32:16, 115:4, 174:19 themselves 8:13, 107:22 thereof 210:17 thereupon 210:9 thing 26:14, 62:22, 87:11, 102:18, 108:7, 136:14, 138:1, 143:20, 153:1 things 30:11, 36:2, 36:5, 36:9, 80:18, 91:5, 98:3, 100:13, 131:5, 136:5, 143:11, 150:22, 163:3, 202:2; 203:3, 203:18, 208:4 think 17:10, 21:16, 25:13, 26:16, 27:2, 31:2, 31:3, 38:22, 40:14, 60:6, 64:4, 65:1, 67:11, 67:20, 78:18, 79:7, 84:9, 88:10, 97:3, 97:9, 107:10, 109:3, 114:11, 120:1, 121:3, 121:5, 121:15, 130:4, 141:5, 146:17,</p>	<p>148:2, 157:16, 175:10, 176:12, 201:21, 202:4, 203:16, 204:20, 205:1, 207:6, 208:6 thinking 39:11 third 131:9, 152:10, 152:20, 194:2 thirteenth 4:6 thirty-three 142:9 thought 97:5, 106:4, 127:11, 137:22, 148:7, 153:2 thoughts 160:5 thousand 108:5, 111:3, 111:4 thread 61:11 three 46:8, 56:17, 92:2, 94:13, 104:16, 128:3, 135:18, 136:4, 136:5 three-month 94:13 threw 102:21, 113:8 through 20:10, 24:10, 29:17, 31:7, 32:6, 32:9, 33:6, 34:4, 54:4, 61:17, 62:7, 75:21, 88:11, 111:2, 116:5, 116:8, 127:21, 129:16, 130:1, 142:3, 143:10, 147:2,</p>
--	--	---	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

35190

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

241

<p>169:15, 192:9, 192:17, 193:3, 203:1, 206:17 throughout 111:5 time 8:7, 26:4, 26:18, 27:6, 27:8, 27:20; 28:13, 29:3, 34:13, 37:4, 37:9, 37:12, 38:2, 38:8, 38:11, 39:3, 39:7, 39:22, 40:17, 41:7, 50:4, 53:1, 68:6, 69:9, 75:15, 77:6, 78:9, 79:1, 87:2, 90:12, 91:18, 108:7, 108:8, 112:15, 117:2, 117:9, 117:13, 128:10, 129:14, 130:3, 134:21, 136:18, 139:6, 148:19, 160:4, 171:3, 175:13, 177:5, 177:12, 178:16, 179:2, 180:19, 184:5, 186:8, 195:10, 195:15, 206:5, 206:13, 206:14, 208:12, 208:15, 209:3 timeline 98:22, 134:19 times 3:12, 91:20, 91:22, 108:5, 108:6, 177:15, 206:14 timing 45:18, 46:3 tired 137:17, 180:12</p>	<p>title 22:6, 170:10 to-do 151:16 today 8:16, 12:1, 60:18, 94:3, 95:22, 124:4, 136:2, 197:4, 208:12 today's 8:7, 12:18, 13:2, 13:20, 209:3 together 17:12, 18:16, 26:10, 48:6, 50:4, 78:22, 103:11, 125:10, 193:11 tokyo 91:21, 92:5, 92:16, 92:20, 93:1, 93:2 told 73:7, 95:20, 137:19, 145:9, 145:10, 161:2, 186:1, 188:3 tomorrow 124:17, 178:16, 179:13 ton 208:14 tons 97:15 took 89:11, 90:8 top 12:20, 48:5, 55:7, 61:19, 83:16, 97:10, 122:14, 126:7, 126:8, 127:4, 127:5, 127:10, 127:14, 128:2, 132:7, 152:10, 152:21, 169:5,</p>	<p>176:11, 176:15, 176:16, 178:6, 190:9 topics 11:8 total 86:3 totally 96:12 touch 195:17 tour 187:16, 188:4, 188:9 tracey 169:8, 169:20, 171:12, 172:1, 174:13, 175:14, 176:4, 178:8, 178:11, 182:2, 182:8, 183:3, 183:21, 185:11, 185:19, 186:20, 187:15, 189:2, 190:10, 190:11 tracey's 189:22 trailer 195:4 trajectory 200:14, 200:15 transcript 6:7, 7:2, 12:8, 29:14, 54:16, 61:6, 88:3, 115:16, 156:19, 167:6, 168:20, 174:3, 178:2, 181:21, 183:18, 185:8, 187:12, 188:22, 190:6, 210:12, 210:13 travel 92:20 treat 144:8 treatment 104:22, 157:6</p>	<p>treece's 16:4, 62:15 trial 64:16, 64:19, 64:20 tried 145:19 trips 90:17, 90:18, 93:12 trouble 13:12 true 76:2, 143:18, 202:20, 203:6, 203:7, 203:9, 203:18, 204:10, 205:2, 205:3, 210:13 truly 108:1, 108:2, 160:6 trust 108:7 truth 143:20 truthfully 60:18 try 36:15, 53:15, 83:20, 84:6, 84:10, 98:7, 144:8, 157:20, 160:10, 184:21 trying 32:15, 45:11, 51:22, 52:4, 53:3, 53:6, 62:20, 62:22, 63:2, 71:16, 81:2, 83:7, 103:14, 113:6, 113:10, 113:14, 114:1, 118:13, 126:11, 129:21, 130:1, 130:2, 136:18, 137:21, 139:16, 139:20,</p>
--	---	---	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

167:9, 169:2, 184:4, 189:22, 191:14, 201:11, 203:6, 203:20, 204:2, 204:22, 205:10, 205:15, 205:16 tuesday 185:21 turkish 189:4 turn 43:6, 47:17, 83:15, 103:10, 122:6, 152:3 turned 172:3, 173:1, 173:8 two 34:2, 54:22, 88:14, 124:9, 125:10, 137:9, 137:12, 138:6, 167:12, 170:19, 176:5, 178:5, 179:13 two-sentence 187:14 type 22:12, 26:14 typescript 210:11 typically 179:2, 195:13 <hr/> <p style="text-align: center;">U</p> <hr/> ugly 171:12 uh-huh 21:1, 31:16, 101:14, 154:2 uk 198:1, 198:7, 199:22, 201:15 ultimately 87:9 ummm 178:9	unclear 161:6 uncomfortable 160:20 under 15:13, 40:1, 40:17, 75:3, 76:14, 95:7, 96:16, 106:9, 120:9, 186:9, 210:11, 210:18 understand 10:16, 11:14, 11:16, 12:1, 14:20, 16:21, 17:8, 24:6, 52:4, 53:7, 63:1, 71:4, 71:20, 72:4, 75:12, 77:1, 77:3, 80:18, 113:6, 114:1, 137:22, 138:2, 144:7, 148:1, 161:20, 164:14, 165:4, 165:7, 181:2, 183:10, 200:12, 202:11, 203:17, 204:3 understandably 144:8 understanding 19:18, 22:13, 32:8, 99:18, 148:18 understood 13:8, 13:10, 27:15, 70:7, 161:14 unfortunately 64:16 unilaterally 116:20 unintelligible 11:5, 27:1, 45:17, 113:16, 147:22, 165:13, 193:18, 203:15	unrecognizable 146:22 until 95:3, 108:3, 188:4, 201:7 unusual 149:20 update 157:3, 157:5, 159:5, 162:13, 162:19 upset 35:11 upsetting 178:15, 179:16 use 29:7, 40:14, 42:16, 82:3, 95:3, 95:7, 97:19, 105:11, 105:20, 136:19, 180:4 uses 42:5, 42:6, 85:2 using 27:9, 29:2, 81:17, 86:9, 158:18 uta 7:5, 7:6 <hr/> <p style="text-align: center;">V</p> <hr/> valid 15:7 various 206:17 vendor 6:16 veracity 207:13 versions 32:1 versus 8:4 vice 3:18 video 8:3, 8:8	videographer 5:13, 8:2, 8:9, 9:1, 54:9, 54:11, 88:17, 88:19, 115:5, 115:8, 115:10, 116:13, 116:15, 165:22, 166:3, 166:6, 208:16 videotaped 1:15, 2:1 view 12:10, 29:17, 156:15 viewed 131:13 views 134:6, 134:15, 162:18 violates 40:8, 42:20, 45:5, 58:22, 68:13, 71:11, 75:7, 82:19, 196:7 violence 166:9 violently 76:17 virginia 1:1, 2:12, 4:16, 8:6, 59:10, 198:14, 198:15, 198:21, 199:6, 210:1, 210:3, 210:7, 210:19 virtually 1:16, 2:2 voice 8:12 volume 43:8, 43:17 <hr/> <p style="text-align: center;">W</p> <hr/> wait 109:16, 120:2 waiting 103:12, 103:17,
---	--	--	---

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

243

<p>201:1 waldman 199:5 walk 32:6, 33:5, 54:3, 61:17, 143:10 walking 142:3 walt 24:9 want 30:13, 32:7, 40:7, 42:9, 42:10, 50:13, 63:4, 65:9, 70:21, 73:9, 74:9, 79:19, 80:2, 80:4, 81:1, 87:6, 100:18, 100:19, 100:20, 101:12, 102:4, 103:18, 115:19, 116:4, 116:7, 119:9, 123:10, 126:16, 128:15, 128:16, 133:5, 136:3, 140:10, 140:21, 141:12, 143:13, 154:4, 167:10, 190:12, 200:12, 201:12 wanted 9:13, 14:7, 55:6, 55:10, 74:14, 74:21, 76:6, 100:11, 137:17, 153:14, 186:21 wanting 137:21 wants 89:7, 90:22, 108:1, 123:8, 137:18, 137:22 warrenville 3:21</p>	<p>washington 4:7 wasted 42:7 watch 91:19 way 19:20, 26:16, 30:10, 46:10, 65:3, 66:13, 74:5, 109:8, 112:17, 138:10, 165:11, 203:22 we'll 21:15, 21:18, 32:9, 33:5, 38:22, 54:3, 54:14, 59:17, 64:10, 70:20, 88:13, 118:17, 122:2, 130:4, 167:3, 167:18, 168:16 we're 25:2, 29:11, 38:13, 46:9, 59:12, 68:14, 100:16, 134:21, 139:4, 142:3, 157:16, 168:17, 180:11, 209:4 we've 68:6, 95:21, 96:8, 101:20, 108:17, 133:2, 136:1, 165:18, 174:1, 181:18, 185:6, 202:4, 206:17 wear 43:9 weaver 1:22, 2:10, 3:20, 9:2, 210:2, 210:22 wednesday 139:5 week 37:10, 37:13,</p>	<p>42:14, 172:2, 186:2, 188:6 weeks 186:3 weird 132:10 welfare 81:6 well-being 77:8 went 85:14, 151:6, 157:19, 203:1 weren't 133:3, 203:18 west 5:7 whatever 26:15, 37:4, 83:8, 99:15, 102:4, 109:6, 207:6 whenever 87:8 whether 22:17, 122:2, 173:19, 198:6 whole 62:22, 102:13, 102:18, 143:14 wife 55:21 willing 141:14, 154:3 winning 145:20 wise 19:10, 198:7 wish 64:5 wit 210:1 withdraw 149:2 within 197:15 without 108:11, 143:19,</p>	<p>196:12 witnessed 200:14 woods 4:14 word 59:16, 83:12, 100:10, 120:5, 145:16 words 20:9, 50:12, 109:7, 143:12, 147:7, 154:15, 162:7 work 9:18, 15:18, 17:11, 18:16, 19:5, 20:2, 26:9, 181:6, 186:7, 191:16 worked 22:12, 22:16, 23:9, 191:22 working 9:19, 9:20, 13:11, 48:9, 176:12, 177:2, 179:4, 193:11 works 115:3, 192:2 world 143:13, 143:15 worried 78:9, 78:12, 78:15, 78:17, 78:19, 82:1 worry 78:4, 123:10 worst 97:9 wouldn't 83:4, 109:5, 135:11, 135:15, 153:15, 159:22, 164:6, 165:19, 186:16, 187:6 wow 153:1</p>
--	---	--	---

CONFIDENTIAL

Transcript of Christi Dembrowski
 Conducted on February 22, 2022

<p>write 96:4, 156:13, 163:3 writes 67:7 written 109:7, 112:17 wrote 84:22, 94:21, 97:1, 161:6, 162:7 wyatt 21:3, 191:18, 191:19</p> <hr/> <p style="text-align: center;">Y</p> <p>yarelyn 3:10, 8:20 yeah 17:6, 30:5, 35:8, 37:17, 40:13, 44:9, 53:10, 56:19, 79:7, 80:5, 87:8, 99:22, 100:3, 105:9, 105:14, 121:21, 150:12, 151:12, 157:4, 167:15, 174:15, 174:22, 183:6, 188:2, 203:4 year 55:8, 182:15, 183:8 years 10:8, 22:17, 25:20, 25:22, 112:5, 133:3, 192:1 yep 152:22 yesterday 170:19, 174:18 ymena@brownrudni- ck 3:15 york 3:13</p>	<p>you-all 26:13, 87:15, 103:11, 104:7, 112:8, 112:10, 127:22, 139:20, 141:15 younger 14:13, 59:21 yourself 39:14, 161:15</p> <hr/> <p style="text-align: center;">Z</p> <p>zellner 3:17, 3:19, 40:6 zoom 119:21, 120:3 zooms 119:16</p> <hr/> <p style="text-align: center;">\$</p> <p>\$2.3 168:8 \$71,000 56:6</p> <hr/> <p style="text-align: center;">0</p> <p>0002911 1:6, 8:6 01 116:15 02 115:8, 166:4 0313158 210:23</p> <hr/> <p style="text-align: center;">1</p> <p>1 1:21, 54:9, 54:11 10 4:15, 122:8, 122:13, 122:15, 123:6, 124:1, 184:1, 209:3 100 186:2 10036 3:13</p>	<p>11 6:18, 168:17, 168:19, 168:22, 169:7 1124 130:8 11246 6:14 11249 122:7 11254 126:6, 130:12, 130:13 11264 131:9 11265 132:8 11268 138:22 11271 137:5 11272 142:7 11298 150:8 11299 152:4 11300 155:7 11301 6:14 1148 163:17 11487 6:15 11488 161:10 11489 6:15 115 6:14, 7:5 12 1:18, 6:9, 6:19, 8:8, 55:8, 137:14, 152:20, 174:1, 174:2, 174:12, 176:4, 176:18, 185:12,</p>	<p>185:19 120 7:6 1212 3:22 13 6:20, 127:6, 127:16, 128:5, 128:17, 130:8, 177:22, 178:1, 178:4 14 178:8 15 55:8, 117:1, 126:5, 126:12, 126:15, 126:19, 126:20, 126:21, 126:22, 128:18, 165:19, 178:12 156 6:15 1578 120:8 1646 122:15, 126:8, 126:15, 127:4, 127:9, 127:15, 152:7 167 6:16 168 6:18 1700 4:8 174 6:19 178 6:20 17928 6:13 17929 100:17 17935 103:11 17937 106:18 17940 6:11, 31:5,</p>
---	---	---	--

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

245

<p>31:10, 31:22, 35:10 17941 43:6 17942 46:12 17943 6:11, 31:7, 31:10, 47:17, 47:19, 48:4 17944 6:12 17945 74:8 17947 83:16 17948 6:12, 87:5 18 6:21, 15:13, 157:2, 166:6, 181:19, 181:20, 182:2, 182:7 1800 4:15 181 6:21 183 6:22 185 7:4 187 7:5 188 7:6 19 6:22, 183:16, 183:17, 183:20 190 7:7 19209 6:21 19216 7:4 19234 6:18 19235 6:18, 169:18</p>	<p>19237 6:19 19239 6:20 1939 6:13 196896 210:22 1st 168:7</p> <hr style="width: 50%; margin: auto;"/> <p style="text-align: center;">2</p> <hr style="width: 50%; margin: auto;"/> <p>2 88:17, 88:19 20 1:17, 7:4, 8:7, 126:9, 127:6, 127:16, 128:5, 128:17, 129:4, 130:8, 178:12, 185:6, 185:7, 185:10 2000 5:8 20005 4:7 20089 6:22 20090 7:7 2013 33:9, 34:13, 47:10, 47:19, 48:16, 49:3, 49:6, 123:6, 124:1, 126:10, 127:6, 127:16, 128:5, 128:17, 129:5, 130:8 2014 61:21, 62:9, 63:6, 63:19, 65:11, 89:1, 89:12, 89:21, 90:8, 104:8, 105:1, 134:22, 135:5, 137:10, 137:13, 138:7,</p>	<p>139:8, 139:21, 140:12, 142:13, 149:10, 157:2, 168:7 2015 56:6, 151:3, 152:14, 152:19, 154:12, 155:10, 169:9, 174:14, 178:8, 178:12, 180:19, 181:6, 181:13, 182:9, 182:19, 184:1 2016 168:7, 185:12, 185:20, 187:17, 189:3, 190:11, 191:1 2017 24:10 2019 1:6, 8:6 202 4:8 2022 1:17, 8:7, 210:6, 210:19 204 3:20 209 3:14 21 7:5, 149:10, 187:10, 187:11 210 1:21 212 3:14 22 1:17, 7:6, 8:7, 33:9, 47:10, 47:19, 48:16, 49:3, 49:6, 188:20, 188:21 2211 3:5 23 7:7, 190:4,</p>	<p>190:5, 190:9 24 80:16, 84:17, 89:12, 117:4, 190:11 24011 4:16 25 88:17, 88:22, 104:8, 105:1, 130:17, 130:18, 131:8, 132:18, 138:7, 139:8, 139:21, 146:2, 182:15, 183:7 26 132:7, 132:16, 169:9, 169:21 27 54:9, 137:10, 137:13, 140:12, 142:13, 174:13, 174:21, 176:17 28 210:19 29 6:11, 138:21 29376 152:19 29380 155:7 2nd 182:9</p> <hr style="width: 50%; margin: auto;"/> <p style="text-align: center;">3</p> <hr style="width: 50%; margin: auto;"/> <p>3 115:8, 115:10, 116:13, 137:14 30 210:6 300 170:18 31 55:8, 168:7 310 5:8 32 88:19, 137:5,</p>
---	--	---	---

CONFIDENTIAL
 Transcript of Christi Dembrowski
 Conducted on February 22, 2022

<p>140:7 33 142:6, 142:11, 142:12 38 1:18, 8:8 3rd 61:21, 62:8, 63:6, 63:19, 65:11</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 116:15 40 176:4 41 152:20 426 152:7 43 31:22, 149:4 433437 1:20 4580 3:20 47 54:11 4823 3:14</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 166:4, 166:6 50 115:10, 176:18 52 116:13 52720 150:10 536 4:8 54 6:10 540 4:17 562 150:10</p>	<p>59 150:4, 150:8 5th 135:5</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 209:3 60 152:3 600 4:6 601 4:6 60555 3:21 61 6:12, 155:6 630 3:22 6529 9:16 66 103:13, 103:19, 104:17 69890 140:10 69892 140:11</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>70413 149:7 7100 3:7 71428 154:1 72 103:12, 103:17 752 3:7 7600 4:17 7th 3:5, 151:3, 187:16</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8752 5:6</p>	<p>88 6:13 8th 152:19, 154:11</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9- 149:10 90069 5:7 92612 3:6 93012 9:17 949 3:7 954 5:8 955 3:22 983 4:17 9th 155:10, 189:3</p>	
--	---	--	--