

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

v.

**FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI**

Defendants.

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IN THE DISTRICT COURT

141st JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

**MONICA RIAL AND RON TOYE’S MOTION TO DISMISS PURSUANT TO THE
TEXAS CITIZENS PARTICIPATION ACT**



J posing with Mignogna in 2014

Q. And you don’t kiss on children anymore?

A. No.

Q. Do you agree with me that’s kind of creepy, right?

A. No.¹

¹ See Excerpts of Deposition of Vic Mignogna (“Mignogna Depo.”), at p. 145 and Ex. 4 (“*J was approximately 14 years old when she attended New York Comic-Con in 2014 and met Mignogna. She described the encounter as “really, really uncomfortable.” She discussed how the voice actor put his hand underneath her zip-up sweatshirt and on her waist for the initial photo. Then, thinking that the photo-taking portion was done, she was surprised when he asked her to look toward the camera again. That’s when he put his face close to hers and then kissed her.*”) (emphasis in original).

Pursuant to the Texas Citizens Participation Act (the “TCPA” or “Act”), Defendants Monica Rial (“Ms. Rial”) and Ronald Toye (“Toye”) (the “Moving Defendants”) respectfully request that this Court dismiss Plaintiff’s Amended Petition (the “Petition”) filed by Plaintiff Victor Mignogna and award Moving Defendants all court costs, reasonable attorneys’ fees, and a sizeable sanction that sends the deterrent message Plaintiff so desperately needs to hear:

I. INTRODUCTION

1. Plaintiff is a public figure and his lawsuit is an all-out assault on Ms. Rial’s and Toye’s right of free speech to comment on a matter of public concern, i.e. Plaintiff’s conduct with children and women both in public and — more insidiously — behind closed doors.

2. Plaintiff’s case is a textbook “Strategic Lawsuit Against Public Participation” or “SLAPP.” Plaintiff is a famous actor, by his own admission one of the biggest names in his field:

One of the most prolific and sought-after voice actors in the business. Vic has recorded hundreds of roles for animated features, TV series, and video games.²

...

In addition to commercial and broadcast music work, Vic’s supervised a wide variety of private recording projects as well . . . from contemporary Christian to rap . . . There’s no greater music than that which worships the Creator of all music! Vic counts it a great joy and privilege to lead worship at venues around the country, having produced several praise and worship albums.³

3. Plaintiff’s fame has long insulated him from accountability, despite over a decade of reprehensible conduct.

4. In January 2019, Plaintiff had a starring role in what would become one of the largest anime movies of all time, but this spotlight of international attention had the unintended effect of exposing his dark past. Commenters on social media, industry publications, and even

² See Exhibit P(1) <https://www.vicsworld.net/voice.html>.

³ See *id.* <https://www.vicsworld.net/music.html>.

other voice actors began discussing long-running rumors of Plaintiff's alleged pedophilia, homophobia, anti-Semitism, and sexual harassment. As the public criticism grew, studios began to investigate, "cons" (conventions where voice actors meet with fans and make a large part of their living) began to disinvite him, and eventually two large Texas production studios publicly ended their relationship with Plaintiff.

5. Plaintiff saw the writing on the wall and spurred his legion of fans to defend him in order to minimize any public criticism. His fans have attacked any and all critics. Allied with an internet shock jock who unleashes a nightly torrent of abuse, harassment, and vitriol online, Plaintiff's goal is clear: with enough abuse, harassment, and threats, Plaintiff's accusers will fall silent.

6. Plaintiff's lawsuit is the hammer designed to smash Monica Rial and Jamie Marchi, two well-known voice actors. If Plaintiff can silence these two women, those with less notoriety and power will retreat into the shadows.

7. This case is exactly what the TCPA was designed to stop. Accordingly, the sanction imposed by this Court should be commensurate with the gravity of Plaintiff's actions, and sufficient to curb his expressed intention to file more of these baseless SLAPP suits.

II. RELEVANT FACTUAL BACKGROUND

A. Plaintiff's First Known Assault Occurs Thirty Years Ago.⁴

8. Plaintiff graduated from Liberty University in 1986, taking his first job at Trinity Christian Academy (leaving after one year).⁵ He also had some relationship with “Lynchburg Christian Academy” in 1989, where he paid special attention to one of his students (a female high school sophomore) during the course of the school year.⁶

9. During the summer of 1989, Plaintiff invited this teenager to his home under the guise of showing her a “Christian worship video.”⁷ But what Plaintiff really wanted was sexual relations with a teenager.⁸ This ruse — inviting a potential victim to a secluded location under false pretenses — would repeat itself. Fortunately, in this occasion, the young woman fended him off.⁹ He left Lynchburg, Virginia for Houston, Texas shortly thereafter.¹⁰

⁴ The bravery that people are displaying to speak out about Mignogna cannot be overstated. Plaintiff has used fear and intimidation to suppress the truth, and even now, through his attorney and allied shock jock, works to intimidate any person who even thinks of coming forward against him. These witnesses are the “good people” who have refused to “let evil triumph”: Robin Michelle Blankenship McConnell (“McConnell Aff.”) (Ex. B); Kara Edwards (“Edwards Aff.”) (Ex. C); Lynn Hunt (“Hunt Aff.”) (Ex. D); Faisal Ahmed (“Ahmed Aff.”) (Ex. E); Mary Reese (“Reese Aff.”) (Ex. F) Whitney Falba (“Falba Aff.”) (Ex. G); Neysha Perry (“Perry Aff.”) (Ex. H); Emmett Plant (“Plant Aff.”) (Ex. I); Adam Sheehan (“Sheehan Aff.”) (Ex. J); Kelly Loftus (“Loftus Aff.”) (Ex. K) Michelle Specht (“Specht Aff.”) (Ex. L); John Prager (“Prager Aff.”) (Ex. M); Monica Rial (“Rial Depo”) (Ex. N”); and Ron Toye (“Toye Depo.”) (Ex. O).

⁵ See Mignogna Depo. at pp. 20-22 (Ex. A). Interestingly, his resume does not list his first job after college, Trinity Christian Academy. See Ex. P(2) <http://www.vicsworld.net/docs/professionalresume.doc>

⁶ See McConnell Aff., ¶¶ 1-5 (Ex. B).

⁷ See McConnell Aff., ¶¶ 5-6.

⁸ See McConnell Aff., ¶¶ 8-9 (“Mignogna went into his bedroom and then came out shirtless and only wearing very small and revealing shorts. I felt incredibly uncomfortable and realized that Mignogna did not have a ‘Christian worship video’ to show me. Mignogna sat on the couch next to me and began putting his arms around me and touching me. He pulled my hair out of my ponytail and started playing with my hair. Mignogna also started licking my ear and stated, ‘Let’s just enjoy each other.’ . . . After several verbal rejections, I was able to push Mignogna off of me and leave. Mignogna was extremely upset at me and incredibly rude.”).

⁹ See McConnell Aff., ¶ 9.

¹⁰ See McConnell Aff., ¶ 11.

B. Plaintiff Spends Twenty Years Cloaking Himself in the Guise of a Christian Actor and Musician – This Persona is Far from the Truth.

10. Plaintiff describes himself as “a voice actor who has performed the voices of animated characters for over 22 years, mainly in ‘anime’ productions.”¹¹ With over 350 actor credits to his name¹² he attends “approximately 35-40” cons every year and derives “a sizeable income from appearance fees guaranteed by contract with the convention producers and from signing autographs, taking photos with fans, and appearing on guest panels.”¹³

11. Plaintiff is also an accomplished actor in front of the camera, writing, directing, and starring in an award-winning web series based on Star Trek,¹⁴ and currently filming three (3) screen projects.¹⁵ Plaintiff’s website also states that he has “produced over 20 independent albums, and regularly works with artists in all styles of song.”¹⁶ Plaintiff has also long positioned himself as a devout Christian.¹⁷

12. His verified Twitter account has over 113,000 followers¹⁸ and he has a dedicated fan club called the “Risembool Rangers,” a reference to one of his most famous characters.¹⁹

13. Plaintiff’s power and celebrity in the anime industry is such that few people will go on the record concerning his conduct.²⁰

¹¹ Petition at ¶ 10.

¹² Mignogna Depo. at p. 242 (Ex. A).

¹³ Petition at ¶ 14.

¹⁴ See Ex. P(3) <https://www.startrekcontinues.com/>.

¹⁵ See Ex. P(6) <https://www.imdb.com/name/nm0586003/>.

¹⁶ See Ex. P(4) <https://www.vicsworld.net/music.html>.

¹⁷ See Mignogna Depo. at p. 237 (Ex A).

¹⁸ See Mignogna Depo. at pp. 48-49; 239.

¹⁹ See Mignogna Depo. at p. 243 and Ex. 26. For reasons unknown, members of the Risembool Rangers refer to him as “The Fuhrer,” including his mother. See Mignogna Depo. at p. 14-15; Ex. P(7).

²⁰ See Mignogna Depo. Ex. 8 at p. 2; see also Edwards Aff., ¶ 13 (Ex. C).

C. Those Who Work with Him Behind the Scenes Describe a Prima Donna Who Uses His Celebrity to Pursue Young Women for Sex.

14. Plaintiff has a history (which he denies) of bans and/or being asked not to come back to conventions.²¹ Of those in the know (and brave enough to speak on the record), prior to this dispute Plaintiff was banned from Tekkoshococon,²² Anime Central Convention,²³ Tekkoshococon again,²⁴ and more recently in 2019, Kawaii Kon and Anime Weekend Atlanta.²⁵ He has been conspicuously absent from the RTX convention for the last two years, despite being one of the studio's biggest stars.²⁶

15. The Tekkoshococon ban in 2007 is particularly troublesome considering (a) he was stalking a Japanese singer and voice actor (who had to move to a secret room with a security detail to keep Vic from finding her), and (b) he was also caught with **three underage** females in his hotel room.²⁷ One security professional that has personally observed Plaintiff for years put it bluntly:

Based on my personal observations, personal interactions, and professional experience and training as a security officer, I believe Mignogna is a sexual predator. He does not pay attention to the age of anyone he talks to. If he is attracted to you, he will make it known aggressively. Further, I observed a lot of encroachment into other individual's personal space. For example, I notice Mignogna place a hand on the wall above a females' heads, touching females on the shoulders and the arms, and whispering in their ears. I observed this behavior repeatedly with women and teenagers. . . .

I believe Mignogna has left a string of sexual assault victims across the country due to his celebrity status that allows him to have ample opportunities to be inappropriate. A lot of the smaller conventions put up with Mignogna, because they know his fans will show up and spend a lot of money.²⁸

²¹ See Mignogna Depo. at p. 101 (Ex. A).

²² See Hunt Aff., ¶ 6 (Ex. D).

²³ See Hunt Aff., ¶ 2.

²⁴ See Hunt Aff., ¶ 8.

²⁵ See Ahmed Aff., ¶ 6 (Ex. E).

²⁶ See Mignogna Depo. at p. 103 (Ex. A).

²⁷ See Hunt Aff., ¶¶ 7-8 (Ex. D); Prager Aff., ¶¶ 2-3 (head of security) (Ex. M); Falba Aff., ¶¶ 5-6 (Plaintiff was red faced and kept repeating "he hadn't done "anything wrong" or done "anything to them [the three young girls]") (Ex. G);

²⁸ Prager Aff., ¶¶ 5-7 (Ex. M).

16. Moreover, eyewitness accounts of his inappropriate contact with convention-goers are legion,²⁹ resulting in convention attendees lodging complaints against him.³⁰

17. Although less concerning, multiple individuals describe Plaintiff as rude to staff and having a bad reputation in the anime convention community.³¹

18. Contrary to the public persona he has created for himself, Vic's behavior reveals that he is not guided by Christian virtue.³²

D. Plaintiff Assaults Monica Rial in 2007.

19. Ms. Rial is a rape survivor and voice actor who has worked in voice acting over the last twenty (20) years, including with Plaintiff.³³

20. In 2007, at Izumicon in Oklahoma City, Plaintiff invited Ms. Rial to his room to “watch a video.” As Ms. Rial was distracted by the video, Vic grabbed her by her arms and began aggressively kissing her, pushed her onto the bed, climbed on top of her and continued to aggressively kiss her while holding her down.³⁴ Notably, this is the same tactic that Plaintiff employed in 1989.³⁵

21. Out of fear for herself and her career, Ms. Rial chose to remain silent until it became clear that Plaintiff had no intention of curbing his predatory behavior.³⁶

²⁹ See Hunt Aff., ¶¶ 3-4 (including giving his phone number to young girls); Ahmed Aff., ¶¶ 3-4 (making cosplayers uncomfortable) (Ex. E); Falba Aff., ¶ 4 (requiring security guard to stand next to him at signing table and witnessing hair pulling and inappropriate touching) (Ex. G); Perry Aff., ¶¶ 3-4 (stroking a convention participant's leg, pulling her hair, and whispering in her ear) (Ex. H); Plant Aff., ¶¶ 4-5 (Ex. I); Sheehan Aff., ¶ 7 (“serial predatory tendencies”) (Ex. J); Loftus Aff., ¶ 4 (unwanted kiss) (Ex. K); Prager Aff., ¶ 5 (“sexual predator”) (Ex. M).

³⁰ See Ahmed Aff., ¶¶ 4-5 (forcibly kissing two different attendees) (Ex. E); Loftus Aff., ¶¶ 5-6 (Ex. L).

³¹ See Hunt Aff., ¶¶ 2-5 (describing him as “high-risk guest” that requires monitoring around young girls and females); ¶ 9 (squeezing Ms. Hunt's buttocks); ¶ 10 (poor reputation) (Ex. D); Reese Aff., ¶ 17 (bad reputation) (Ex. F); Falba Aff., ¶¶ 3-4 (terrible to staff) (Ex. G); Sheehan Aff., ¶ 4 (bad reputation) (Ex. J); Lotus Aff., ¶ 7 (poor reputation) (Ex. K); Prager Aff., ¶ 7 (bad reputation) (Ex. M).

³² See Falba, ¶ 8 (requested religious service to talk about himself) (Ex. G); see Mignogna Depo. at p.131 (Ex. A).

³³ See Rial Depo. at pp. 9-10, 29-31 (Ex. N).

³⁴ See Rial Depo. at pp. 29-31, 61-62 (Ex. N); Mignogna Depo. at Ex. 20, pp. 5-6 (Interrogatory No. 4) (Ex. A).

³⁵ See McConnell Aff., ¶¶ 5-6 (Ex. B).

³⁶ See Rial Depo. at pp. 51, 54, 74-75 (Ex. N).

E. Plaintiff Tries to Force Himself on Kara Edwards.

22. Plaintiff’s assault of Ms. Rial is similar to Plaintiff’s attempt to have sex with voice actor Kara Edwards in 2008 and then again in 2010 (at the ShadoCon convention in Tampa, Florida).³⁷ Plaintiff harassed and intimidated Ms. Edwards, ignoring her resistance — and his own preexisting relationship — in hopes of pressuring another woman into compromising herself for his pleasure.³⁸ Plaintiff again attempted to corner a vulnerable woman in a secluded place.

23. Ms. Edwards felt threatened, and that her career would suffer by rejecting his advances.³⁹ Nevertheless, she resisted Plaintiff’s aggressive attempts to bed her, and the following day Plaintiff exacted his petty revenge on Ms. Edwards by interfering with her pre-scheduled autograph signing.⁴⁰ Ms. Edwards disclosed Plaintiff’s actions to Mary Reese the following day.⁴¹

24. Ms. Edwards has since attempted to avoid working on projects with Plaintiff, and has declined to attend conventions when Plaintiff attends.⁴²

F. Plaintiff has a Decade of Admitted Infidelity and “Consensual” Sexual Activity in the Anime Industry.

25. To the outer world, Plaintiff represented that he was in a committed relationship with voice actress Michelle Specht (which ran from 2006 to 2018).⁴³ Not only did they live together, they were engaged in 2010.⁴⁴ During this time, Plaintiff:

- a. Assaulted Ms. Rial;
- b. Tried to have sex with Ms. Edwards on two separate occasions;

³⁷ See Edwards Aff., ¶¶ 5-6 (“Open the door. Nobody has to know . . . Come on, Kara. Nobody has to know. You know you want this.”); ¶ 10 (“Let me be sweet to you.”) (Ex. C).

³⁸ *Id.*

³⁹ See Edwards Aff., ¶¶ 14-16.

⁴⁰ See Edwards Aff., ¶ 15.

⁴¹ See Edwards Aff., ¶ 15; Reese Aff., ¶¶ 9-10 (Ex. F).

⁴² See Edwards Aff., ¶¶ 21, 23.

⁴³ See Specht Aff., ¶¶ 2-3 and Exs. 1-4 (Ex. L).

⁴⁴ See Specht Aff., ¶ 3.

- c. Solicited sex from a prostitute;
- d. Tried to have sex with two women (related by birth) at the same time during a convention;
- e. Had at least one ongoing sexual relationship while engaged to Ms. Specht; and
- f. Made “mistakes” during the engagement with Ms. Specht, somewhere between five and 50 times.⁴⁵

26. Despite Plaintiff’s prodigious sexual appetite, his bizarre explanation for why people “make up” stories about him sexually assaulting them is they do it to “get attention.”⁴⁶

Q. I mean, is there something about anything that you’ve done over the past 20 years in the voice acting community that would lend credence to people thinking that maybe you were a sexual assaulter?

A. No. There are an awful lot of fans out there who are really desperate for attention, and they often like to talk about people to get it.

Q. **And so your theory is that they make up stories about you sexually assaulting them to get attention?**

A. **Absolutely.**

Q. Wouldn’t it be better to say ‘I had sex with Vic’ to get attention, as opposed to say ‘Vic assaulted me’?

A. Oh, I’m sure, give it time, or if you haven’t seen it, I’m sure somebody out there would say that.⁴⁷

27. It has become clear to Ms. Specht that Vic lied to her throughout their twelve-year relationship, and that he used his fame and attendance at conventions to pursue sex with as many of his young fans as he could.⁴⁸ Vic has no words to express his shame for his conduct.

⁴⁵ See Mignogna Depo. at pp. 120-131, 140-41 (Ex. A).

⁴⁶ Ironically, these desperate women seeking fame by slandering Vic do so anonymously, negating whatever fifteen minutes of fame Vic believes his name guarantees.

⁴⁷ Mignogna Depo. at p. 140 (emphasis added) (Ex. A).

⁴⁸ See Specht Aff. at Ex. A (“ You systematically targeted dozens upon dozens of fangirls (most at least half your age) with whom you first built trust - some over long periods of time online, some in a manner of minutes in person - and made each one feel so very special and ‘chosen’ with the endless charm, attention, and mask of sincerity that abounds when you want something - seduced them, propositioned them, and turned them into convention xxxxx - doing so in every city and every country you went to - calling me afterward like you always did before you went to bed (sometimes with them still in the room)... but you loved me, right? You used your STC and con buddies as regular ‘wingmen’ at conventions to help arrange these hook-ups - xxxxxxxx your way from one cosplayer to another - one group to the next - telling each one ‘I don’t usually do this - there’s just something about you’ - convincing them you didn’t need to use condoms because “‘hey were the only one’ or ‘don’t worry - I’m taken care of’ - after which you would come home and slip into our bed beside me as if nothing had happened... but you loved me, right?”) (Ex. L).

Notably, when Plaintiff responded to Ms. Specht—from a different email address—he did not deny the allegations,

G. On January 16, 2019, Plaintiff’s Long History of Alleged Sexual Harassment, Pedophilia, and Homophobia Erupt Online.

28. One of Vic’s most popular characters is “Broly” from the Dragon Ball Z series.⁴⁹

On January 16, 2019, a new Dragon Ball movie titled “Dragon Ball Super: Broly” premiered in the United States, “earning \$7 million on its first day and \$24 million within the first five days of its premier.”⁵⁰ To date, the film has grossed over \$30,700,000 in the United States box office alone, and more than \$88,000,000 worldwide.⁵¹

29. The same day as the premiere “someone with the Twitter handle ‘hanleia’ . . . accused Vic of being ‘a homophobic rude asshole who has been creepy to underage female fans for over ten years....’”⁵² The same user tagged Funimation with the question:

“‘Hey @Funimation why do you employ a known pedophile’ and a link to allegations of sexual misconduct by Mr. Mignogna at anime conventions.”⁵³

“The thread quickly spread with over 4,000 retweets . . . and over 400 comments, many relaying their own negative experiences, including unwanted and unsolicited physical affection from” Plaintiff.⁵⁴

30. This is not at all surprising, as Plaintiff admits receiving criticism for years for kissing young girls, and acknowledges rumors of pedophilia dogging him well prior to January 2019.⁵⁵ His decade-long run of infidelity while in a relationship with Ms. Specht obviously did not help matters.⁵⁶

and conveniently did not include the email from Ms. Specht in his response.

⁴⁹ Petition at ¶ 13.

⁵⁰ Petition at ¶ 13.

⁵¹ See <https://www.imdb.com/title/tt7961060/>

⁵² Petition at ¶ 15.

⁵³ See Funimation Productions, LLC’s Motion to Dismiss Under the TCPA (“Funimation MTD”), Affidavit of Karen Mika (“Mika Aff.”), ¶ 5 (incorporated as if herein).

⁵⁴ See Mignogna Depo. at Ex. 4, p. 2 (Ex. A).

⁵⁵ See Mignogna Depo. at pp. 159-60, 171, 205-06, 228.

⁵⁶ See Specht Aff., Ex. 1 (Ex. L).

1. Plaintiff weaponizes his fanbase, and issues several self-serving statements to spin the narrative in his favor.

31. As allegations of misconduct intensified, and perhaps realizing the social climate no longer supported his behavior, on January 19, 2019, Plaintiff arranged an online chat with the Risembool Rangers.⁵⁷ The instruction was clear: “do whatever you can do to counter all these lies and negativity.”⁵⁸

32. Weaponizing his followers is a tried and true tactic for Plaintiff. For years, Plaintiff has hosted what are in the anime community referred to as “rumor panels” in which he seeks to “dispel” rumors about himself that are upsettingly similar to the communications at issue in this dispute.⁵⁹ For example, in July 2016, Plaintiff told the assembled fans at ANIME-zing! in Davenport, Iowa that women who made allegations against him are merely “unimportant” people seeking attention that do “stupid, meanspirited, hateful things, just to get attention...All because they want somebody to notice them.”⁶⁰ “If somebody was sad and lonely and felt unimportant enough and was so desperate for attention that they thought ‘I’m gonna say something about somebody that a lot of people know just to get some attention.’”⁶¹

33. On January 19, 2019, he sounded the call to arms for the Risembool Rangers.⁶² Plaintiff explicitly refers to his “hugging” and “affectionate” demeanor, arming his supporters with what continues to be his main defense: his accusers are desperate liars.⁶³ He calls the allegations against him “absurd” and “baseless garbage” leveled by a “tiny group of detractors,” as if the

⁵⁷ See Mignogna Depo. at pp. 147-152 and Ex. 26. This is similar to what Plaintiff did in 2010 when he hosted a “rumor panel” to spin up his fans to defend him. See Mignogna Depo. at pp. 199-203 and Ex. 21.

⁵⁸ See Mignogna Depo. at Ex. 26. Notably, Plaintiff did not share with his fans his decade long betrayal of Ms. Specht, because what fan would support someone who is so shamelessly unfaithful.

⁵⁹ See Mignogna Depo. at p. 199 (Ex. A).

⁶⁰ See <https://www.youtube.com/watch?v=DQ7oN6zk9KM> (starting at the 26:00 minute mark).

⁶¹ *Id.*

⁶² See Mignogna Depo. at pp. 149-152 and Ex. 26.

⁶³ See *id.*

allegations would have more force had there been more women coming forward.⁶⁴ And again, he instructs his supporters to “do whatever you can do to counter all these lies and negativity.”⁶⁵

34. With his legions ready to pounce and armed with his talking points, Plaintiff issued an “apology” the following day (the “January 20 Apology”) to address years of rumors concerning his homophobia, anti-Semitism, and accusations of sexual harassment and pedophilia.⁶⁶

Finally, any allegations of sexual harassment, sexual assault, or most disturbingly, pedophilia are COMPLETELY AND UTTERLY FALSE. My heart weeps for anyone who endures a violation of this kind, so to be accused of harming others in this way....I have no words.
--

2. The apology fails, and numerous articles outline what insiders have known for years.

35. The attention from Dragon Ball Super: Broly, along with the ensuing firestorm online (no doubt exacerbated by Plaintiff stirring up his fan base), in turn launched a series of online articles recounting in excruciating detail the long history of Plaintiff’s poor reputation:

- *January 25, 2019, Polygon.com, “Dragon Ball Super: Broly voice actor responds to sexual harassment, homophobia claims:”*

“Many conventiongoers’ stories continue to come out on social media, detailing times when the actor acted flirtatiously towards them (fondling, kissing, groping, etc.) without their consent, most while they were still underage. While these allegations are only just picking up steam, many of them go as far back as 2010. In addition to the sexual harassment claims, Mignogna’s alleged homophobic behavior remains a concern with anime fans.”⁶⁷

- *January 30, 2019, Anime News Network, “‘Far from Perfect’: Fans Recount Unwanted Affection from Voice Actor Vic Mignogna.”*

“A Twitter thread posted on January 16 accused *dub voice actor Vic Mignogna* of homophobia, rude behavior, and most concerning, making unwanted physical advances on female con-goers.”⁶⁸

- *February 1, 2019, thedaoofdragonball.com/blog, “Fixing the Staircase: Vic Mignogna’s Sexual Assault Allegations and the Voice Actors Who Speak Out”*

⁶⁴ *Id.*

⁶⁵ *See id.*

⁶⁶ *See* Mignogna Depo. at p. 204 and Ex. 14(Ex. A).

⁶⁷ *See* Mignogna Depo. at Ex. 2, p. 4.

⁶⁸ *See* Mignogna Depo. at Ex. 4, p. 1 (emphasis in the original).

“Vic Mignogna, the voice of Broly in *Dragon Ball Super*, has been accused of sexually assaulting women at anime conventions. . . . However, numerous allegations of sexual assault have shadowed Mignogna’s career and continue up to today. During the research for this article, over 100 independent allegations surfaced, dating back to 2003.”⁶⁹

- *February 19, 2019, Gizmodo.com, “One of Anime’s Biggest Voices Accused of Sexual Harassment.”*

“Stories about Mignogna have been circulating online for over a decade, including through the Tumblr blog Dear Vic Meggnogna, but the latest round of accusations started surfacing around mid-January of this year. io9 spoke with more than 25 voice actors, cosplayers, industry professionals, convention employees, and former fans about their experiences with Mignogna. Many of them asked not to be named in fear of retaliation from Mignogna or his fanbase. . . .”⁷⁰

36. Unbeknownst to the public at large, Funimation conducted an investigation into Plaintiff’s behavior, including interviewing Ms. Rial and three (3) others, found his explanations unconvincing and quietly terminated its relationship with him on January 29, 2018.⁷¹

37. Plaintiff concedes (as he must) the foregoing articles are defamatory and damaged his reputation (collectively, the “Defamatory Articles”).⁷²

⁶⁹ See Mignogna Depo. at Ex. 5, p. 5.

⁷⁰ See Mignogna Depo. at Ex. 8 at p. 2 (Ex. A).

⁷¹ See Mika Aff., ¶ 7 (“On or about January 29, 2019, Tammi Denbow reported to me and Trina Simon that Ms. Denbow had found that certain allegations of inappropriate conduct made against Mr. Mignogna were credible.”); Rial Depo. at pp. 27-31 (Ex. N); Affidavit of Tammi Denbow (“Denbow Aff.”), ¶¶ 2-5 attached as Exhibit B to the Funimation MTD, and incorporated as if herein.

⁷² See Mignogna Depo. at pp. 142-43, 156-157, 164, 230-31 (“Q. You would agree with me that if you don’t sue those magazines, your reputation is still going to be damaged because you’ll never -- A. Oh, I would say my reputation has been irreparably damaged. Q. And because of those articles, correct? A. No, sir, because of everything. **All of it. It’s a cumulative thing. Didn’t you use -- like the term you used, death by a thousand cuts, you know.**”) (emphasis added). Obviously, if the allegations are true the articles are not defamatory. That of course explains why Plaintiff has not sued any of the authors and/or their publishers.

H. Plaintiff’s Poor Reputation in General, Refusal to Acknowledge that Kissing Children is Improper, Twitter Firestorm, and Defamatory Articles Take Their Toll—Two Major Anime Studios Terminated their Association with Plaintiff, Causing Plaintiff to Lose Multiple Conventions by February 6, 2019.

38. On February 5, 2019, anime studio Rooster Teeth publicly terminated its relationship with Plaintiff.⁷³

39. Between January 18, 2019 and February 6, 2019, Plaintiff lost ten (10) convention invites.⁷⁴

40. On February 11, 2019, Funimation publicly terminated its relationship with Plaintiff.⁷⁵

I. Plaintiff Sends a Faux Apology to Ms. Rial to Set Up and Generate Sympathy with a Public Apology.

41. On February 8, 2019, Plaintiff sent an email to Ms. Rial under the guise of wanting to know what he did wrong.⁷⁶ Notably, **he did not** send an apology email to the other three (3) women who were part of the Funimation investigation.⁷⁷

42. On February 13, 2019, two days after Funimation’s public termination, Plaintiff issued another Twitter apology, in which he stated that it was not his place to contradict people if they claim that he has made them feel uncomfortable.⁷⁸ But this time, Plaintiff specifically drags his “colleagues” into the public fray.⁷⁹

⁷³ See Mignogna Depo. at pp. 104, 108-09 and Ex. 6.

⁷⁴ See Petition, ¶¶ 20, 22-23, and 25-27; Ex. Q (demonstrative highlighting the loss of conventions in relation to the Defamatory Articles).

⁷⁵ See Mignogna Depo. at pp. 111, 180 and Ex. 7. Within Funimation there were security locks installed to separate employees from voice actors that were referred to as “Vic Locks” for the obvious reasons identified herein. See Sheehan Aff., ¶ 6 (Ex. J).

⁷⁶ See Mignogna Depo. at p. 208 and Ex. 14 (Ex. A). Notably, Plaintiff contends, even at his deposition on June 26, 2019, not to know what he did to Ms. Rial. See *id.*, (“I am embarrassed to say that I honestly don’t know. I hope you will share it with me so that I may sincerely apologize.”). No one should expect an apology, sincere or otherwise, from Plaintiff.

⁷⁷ See Mignogna Depo. at p. 54.

⁷⁸ See Mignogna Depo. at p. 206 and Ex. 16.

⁷⁹ *Id.*

J. An Amateur Internet “shock jock” Injects Himself into the Controversy and Raises Over \$225,000 to Help Grind the Defendants into Dust.

43. Nick Rekieta, an internet shock jock, is a Minnesota resident who manages a channel on YouTube and is allegedly a practicing lawyer and “journalist.”⁸⁰

44. Sometime in February 2019, allegedly out of the blue, this shock jock contacted Plaintiff directly to express his support for Vic’s “plight.”⁸¹ On February 19, 2019, Rekieta set up a Go Fund Me campaign for the purpose of funding lawsuits against “MANY possible defendants,” including bloggers, corporations, and pseudo-anonymous keyboard warriors (the “GFM War Chest”):⁸²

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

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

BUT IT’S TIME TO FIGHT BACK. Brigades of pseudo-anonymous keyboard warriors cannot be allowed to defame and destroy decades of goodwill on rumor and unverifiable allegation. Companies cannot rely on non-credible accusations and devastate a career for virtue points.⁸³

⁸⁰ <https://www.youtube.com/channel/UCbkjX3E0IhuUfPzL0FjSPaw> Rekieta does not appear to have any relevant experience in defamation disputes. *See* Ex. P(1). Nor, unsurprisingly, any investigative journalist credentials.

⁸¹ *See* Mignogna Depo. at pp. 33-34. The exact genesis of this relationship between Plaintiff and shock jock is unknown because Plaintiff—even after this litigation began—has a pattern and practice of deleting relevant text communications. *See* Mignogna Depo. at 34-35, 261-62.

⁸² *See* Mignogna Depo. at Ex. 11.

⁸³ This last sentence, juxtaposed against the rumors and evidence cited herein about Plaintiff, irrefutably demonstrates shock jock’s lack of prior investigation into Plaintiff’s reputation in the anime industry. It also undermines any assertion of credible, investigative skills.

45. On February 20, 2019, Plaintiff told his 113,000 Twitter followers that he “approved” the creation of the GFM War Chest.⁸⁴ Plaintiff acknowledges that his previous statements had been intended to silence his critics, but that he had failed to do so.⁸⁵ Plaintiff refers to Rekieta as a “friend,” and directs his dedicated fans to donate their funds for his retaliatory lawsuit.⁸⁶ The motive for the GFM War Chest, as explained by shock jock:

There are hundreds of hours of video of my motives for contributing to the GoFundMe War Chest, the er of, of creating it, not contributing to it. The biggest one is I just don’t like any of the defendants and I think they’re terrible people, and I want to see them ground into dust. Because when you lie to take away a man’s livelihood you deserve to be ground into dust. You are scum and you know it. That’s why I created it.⁸⁷

46. Capitalizing on the sensationalism of this dispute, shock jock has used his YouTube show mainly to generate money for himself, and secondarily to threaten the disclosure of personal information of any witnesses hostile to Plaintiff:

“Hey Pretty Ugly Little Liars. I know you’re watching even though you’re never ever understanding. But, just in case you don’t realize what that means. Is that **if any of your identities are discerned by the court...it might not even be me.** It might be Casey leaking them to Shane that makes them public. **That would be a real shame. That would be a real shame. If uh like your workplace,** like let’s say there was someone who emailed a convention or a signing event or something, **and it was easy to ascertain where they worked.** Like imagine what happens when that person who goes out and lies about someone to get their job ruined, **that person’s email and workplace gets exposed to the internet.** I just...it’s the weirdest thing on earth that they would ask for this.”⁸⁸ (emphasis added).

47. True to his word, Rekieta’s and Vic’s fans have embarked on a terrifying campaign of harassment and threats of Defendants and several witnesses.⁸⁹ This, combined with Plaintiff’s

⁸⁴ See Mignogna Depo. at p. 41 and Ex. 17 (Ex. A).

⁸⁵ See Mignogna Depo. Ex. 17 (Ex. A).

⁸⁶ See *id.*

⁸⁷ <https://www.youtube.com/watch?v=aaazoGTvqZU> (starting at the 50:30 minute mark).

⁸⁸ See Ex. P(8). Pretty Ugly Little Liars is a website that has collected dozens of articles on Plaintiff’s inappropriate activities. See Mignogna Depo. at Ex. 25 (Ex. A).

⁸⁹ See Ahmed Aff., ¶¶ 5, 7 (Ex. E); Plant Aff., ¶ 6 (Ex. I); Edwards Aff., ¶ 25 (Ex. C); Rial Dec. (Ex. R), ¶ 3.

intent to sue others in the future, has created a toxic public debate, instigated by Plaintiff and his online proxies.⁹⁰

K. Prior to Filing Suit, Vic’s Friend Proposes an Agreement to Avoid Litigation: Plaintiff will Publicly Declare Himself a “Sex Addict” if Ms. Rial and Ms. Marchi will Recant.

48. On March 6, 2019, Plaintiff’s longtime friend Chuck Huber, whom Plaintiff claims is a truthful person,⁹¹ floated a proposed statement that Plaintiff would issue in exchange for Ms. Rial and Ms. Marchi effectively recanting their public statements:

From Vic Mignogna

My name is Vic Mignogna and I am a sex addict. Addict behavior is, by its nature, is hurtful and mostly unseen by the addict. I am working with a therapist to understand my addiction and to get healthy. I have never intended to hurt anyone but it so obvious now that I did. To the people I hurt, there are no words that will suffice. All I can say is that this experience has permanently moved me toward a better path and I am doing my best to be a better person. I am sorry and will make amends wherever possible. **To the fans who continue to harass and threaten, you are not my fans if you do this. Your behavior needs to change every bit as much as mine does.** Like me, you should be given the opportunity to change. I am working everyday to be the same on the outside as I am on the inside. I only ask for the opportunity to demonstrate that I have changed and to continue the work I so dearly love. I am canceling my appearance at Anime Matsuri and am taking a leave from all convention appearances until, in conjunction with my therapist, I am ready to come back. I will take my recovery and return one day at a time. (emphasis added).⁹²

49. Huber even references the “legal team” as requiring a statement from Ms. Marchi and Ms. Rial, and the belief that shock jock “would be onboard.”⁹³

50. Ms. Marchi and Ms. Rial refused to agree to the proposed statements because they were untruthful.⁹⁴ And they refused even though Huber previewed the vicious online assault that

⁹⁰ See *id.*; see also Mignogna Depo. at Ex. 4, p.1.

⁹¹ See Mignogna Depo. at pp. 71-72.

⁹² See Mignogna Depo. at pp. 81-84, 86-89 and Exs 12-13 (Plaintiff admits to seeing the email but not “authorizing” it to be sent) (Ex. A); Rial Dec, ¶ 2 (Ex. R).

⁹³ See Mignogna Depo. at Ex. 13;

⁹⁴ See *id.*

Plaintiff would unleash:

And please don't mistake this as some weakness on their part. This is my efforts to try and stop something I know will be very damaging. They have a full court press prepared that is not a minor effort. They will be extremely thorough in both the legal and social spheres.⁹⁵

51. Deterring these types of scorched-earth tactics, waged by a powerful man lashing out at his victims, is the precise reason the TCPA exists.

III. ARGUMENT AND AUTHORITIES

A. Applicable Standards Under the TCPA.

The stated purpose of the TCPA is to “encourage and safeguard the constitutional rights of persons to petition, speak freely, associate freely, and otherwise participate in government to the maximum extent permitted by law and, at the same time, protect the rights of a person to file meritorious lawsuits for demonstrable injury.”⁹⁶ Because the TCPA provides a procedure for expeditiously dismissing a legal action that “is based on, relates to, or is in response to the party’s exercise of the right to free speech [or] the right to association, Courts “construe [the TCPA] liberally to effectuate its purpose and intent fully.”⁹⁷

The TCPA defines *exercise of the right of free speech* as any communication made in connection with a matter of public concern.⁹⁸ *A matter of public concern* means any issue related to health or safety, environmental, economic, or community well-being, a government or public figure, or a good, product, or service in marketplace.⁹⁹

⁹⁵ *See id.*

⁹⁶ TEX. CIV. PRAC. & REM. CODE § 27.002; *Hersh v. Tatum*, 526 S.W.3d 462, 466 (Tex. 2017).

⁹⁷ TEX. CIV. PRAC. & REM. CODE § 27.011(b).

⁹⁸ *Id.* at § 27.001(3) (emphasis added).

⁹⁹ *Id.* at § 27.001(7).

The TCPA broadly defines “communication” as “the making or submitting of a statement or document in any form or medium, including oral, visual, written, audiovisual, or electronic.”¹⁰⁰ The TCPA does not require that communications at issue specifically mention a matter of public concern or have more than a tangential relationship to such a matter to qualify under the TCPA’s right of free speech; rather, it applies so long as the movant’s statements are in connection with issues related to any of the matters of public concern listed in the statute.¹⁰¹

The TCPA further defines *exercise of the right to association* to mean “a communication between individuals who join together to collectively express, promote, pursue, or defend common interests.”¹⁰² Multiple courts have determined that legal actions implicating the right of association within a group or organization meet the first step of the TCPA.¹⁰³

If the movant “shows by a preponderance of the evidence that the legal action is based on, relates to, or is in response to the party’s exercise of the right to free speech [or] the right to association,” then the burden shifts to the non-movant to establish “a prima facie case ***for each essential element*** of the claim in question” through ***clear and specific*** evidence.¹⁰⁴ “In determining whether a legal action should be dismissed under this chapter, the court shall consider the pleadings and supporting and opposing affidavits stating the facts on which the liability or defense is based.”¹⁰⁵

¹⁰⁰ *Id.* at § 27.001(1).

¹⁰¹ *ExxonMobil Pipeline Co. v. Coleman*, 512 S.W.3d 895, 900 (Tex. 2017).

¹⁰² TEX. CIV. PRAC. & REM. CODE § 27.001(2).

¹⁰³ See *Backes v. Misko*, 486 S.W.3d 8, 20 (Tex. App.—Dallas 2015, pet. denied) (conspiracy amongst friends to defame implicates right of association); *Elite Auto Body LLC v. Autocraft Bodywerks, Inc.*, 520 S.W.3d 191, 205-206 (Tex. App.—Austin 2017, pet. dismissed) (conspirators within a company (allegedly misusing trade secrets) trying to recruit others to the company implicates right of association); *Abatecola v. 2 Savages Concrete Pumping, LLC*, 2018 WL 3118601, at *7-8 (Tex. App.—Houston [14th Dist.] June 26, 2018) (mem. op.) (conspiracy between company and its new employee to tortiously interfere with new employees’ former contract implicates right of association).

¹⁰⁴ TEX. CIV. PRAC. & REM. CODE at § 27.005(b) and (c) (emphasis added); *Hersh*, 526 S.W.3d at 466, 468.

¹⁰⁵ *Id.* at § 27.006(a).

Clear and specific evidence means more than the standards traditionally associated with notice pleading.¹⁰⁶ Plaintiff must do more than provide fair notice of his claims; he must come forward with enough detail to show the factual basis for his claims.¹⁰⁷

Even if the non-movant can make such a showing, the court still must dismiss the action “if the moving party establishes by a preponderance of the evidence each essential element of a valid defense to the nonmovant’s claim.”¹⁰⁸

If the motion to dismiss is granted, the court must award to the movant: (1) its court costs, reasonable attorneys’ fees, and other expenses incurred in defending the action as justice and equity may require; and (2) sanctions against the party who brought the action as the court determines are sufficient to deter that party from bringing similar actions.¹⁰⁹ A party seeking dismissal under the TCPA may also seek findings regarding whether the legal action was brought to deter or prevent the moving party from exercising constitutional rights and is brought for an improper purpose, including to harass or to cause unnecessary delay or to increase the cost of litigation.¹¹⁰

B. This Lawsuit is Based on the Moving Defendants’ Exercise of their Right of Free Speech.

It is axiomatic that the Petition implicates a matter of public concern.¹¹¹ Twitter statements concerning Plaintiff’s improper behavior (exacerbated by his own public comments),¹¹² coupled with turning his shock jock loose to further fan the flames, perpetuated this controversy.¹¹³ All of

¹⁰⁶ *In re Lipsky*, 460 S.W.3d 579, 590-91 (Tex. 2015).

¹⁰⁷ *See id.*

¹⁰⁸ TEX. CIV. PRAC. & REM. CODE § 27.005(d).

¹⁰⁹ *Id.* at § 27.009.

¹¹⁰ *Id.* at § 27.007(a).

¹¹¹ *Hersh v. Tatum*, 526 S.W.3d 462, 467 (Tex. 2017) (“When it is clear from the plaintiff’s pleadings that the action is covered by the Act, the defendant need show no more.”).

¹¹² *See* Petition, *passim*; Mignogna Depo. at Exs. 14, 16, and 27 (Ex. A); *Lane v. Phares*, 544 S.W.3d 881, 889 (Tex. App.—Fort Worth 2018, no pet. h.).

¹¹³ *See supra* Section II, ¶¶ 22-44.

Plaintiff's claims against the Moving Defendants are based on, relate to, or are in response to Moving Defendants' exercise of the right of free speech through their online communications. Moreover, the communications Plaintiff seeks to silence concern his numerous improper interactions with young women and children at conventions attended by thousands of people, implicating health or safety and the well-being of the local, national, and international community of fans who attend these conventions.¹¹⁴

When asked about whether his credibility has been hurt by Moving Defendants' tweets, Plaintiff candidly admitted that "[t]here's a matter of public perception that I think we can all agree is -- is pretty prevalent and powerful these days"¹¹⁵ and the "allegations surrounding [his] alleged homophobia, anti-Semitism, and sexual harassment are being discussed publicly...."¹¹⁶ Plaintiff admits that he does not know whether he is suing for monetary damages, and has "not discussed any numbers of any kind of monetary anything."¹¹⁷ This lawsuit is to "stop people from -- to -- to end the public attacks, and to somehow reach an agreement where these people do not contact events and production companies to try to keep me from working and making a living."¹¹⁸

And to grind the Defendants into dust.¹¹⁹

C. This Lawsuit is Based on the Moving Defendants' Exercise of their Right of Association.

The TCPA mandates that the Court dismiss a legal action against a moving party if the action is based on, relates to, or is in response to the party's exercise of the right of association.¹²⁰

¹¹⁴ See Mignogna Depo. at p. 24; *see, e.g., Lane*, 544 S.W.3d at 889; *Backes*, 486 S.W.3d at 20 (holding that internet post about child's safety and health status concerned "health and safety" under TCPA); *Bilbrey v. Williams*, No. 02-13-00332- CV, 2015 WL 1120921, at *8-9 (Tex. App.-Fort Worth Mar. 12, 2015, no pet.) (holding defendants' statements about plaintiff's alleged threats to members of community involved "health and safety" under TCPA).

¹¹⁵ Mignogna Depo. at p. 29.

¹¹⁶ Mignogna Depo. at p. 30.

¹¹⁷ Mignogna Depo. at 91:23-92:5.

¹¹⁸ Mignogna Depo. at pp. 89, 91-92.

¹¹⁹ *See supra* Section II, ¶ 42.

¹²⁰ *See MacFarland v. Le-Vel Brands LLC*, No. 05-16-00672-CV, 2017 Tex. App. LEXIS 2569, at *19 (Tex. App.-

To be an exercise of the right of association, a communication must be “between individuals who join together to collectively express, promote, pursue, or defend common interests.”¹²¹ The Moving Defendants have the right to associate among themselves and communicate with others who have experienced Plaintiff’s abuse and inappropriate behavior, and to communicate about those common interests within the larger anime community.¹²²

D. Plaintiff Cannot Show Clear and Specific Evidence Establishing Each Essential Element of His Claims Against the Moving Defendants.

After the movant “shows by a preponderance of the evidence that the legal action is based on, relates to, or is in response to the party’s exercise of the . . . right of association” then the burden shifts to the non-movant to establish “a prima facie case *for each essential element* of the claim in question” through *clear and specific* evidence.¹²³ “Clear and specific evidence” of each essential element of a claim is more than “mere notice pleading.”¹²⁴ In order to carry his burden, Plaintiff must “provide enough detail to show the factual basis for [his] claim.”¹²⁵ Conclusory allegations do not pass muster under the TCPA.¹²⁶

1. Plaintiff cannot show clear and specific evidence for his defamation claims against the Moving Defendants.

To prevail on his claims for defamation against the Moving Defendants, Plaintiff must prove that (a) the Moving Defendants published a false statement of fact; (b) the statement defamed the plaintiff; (c) the Moving Defendants acted with actual malice; and (d) the statement

Dallas Mar. 23, 2017, no pet.) (citing TEX. CIV. PRAC. & REM. CODE § 27.005(b)).

¹²¹ TEX. CIV. PRAC. & REM. CODE § 27.001(2).

¹²² *Backes*, 486 S.W.3d at 20.

¹²³ TEX. CIV. PRAC. & REM. CODE § 27.005(b) and (c) (emphasis added); *Hersh*, 526 S.W.3d at 466, 468.

¹²⁴ *In re Lipsky*, 460 S.W.3d 579, 590 (Tex. 2015).

¹²⁵ *Id.* at 590–91.

¹²⁶ *Id.* at 592–93.

proximately caused damages.¹²⁷ Because Plaintiff is a public figure, he must show that Moving Defendants acted with actual malice.¹²⁸

Plaintiff is a public figure given his “pervasive fame or notoriety” such that he is “a public figure for all purposes and in all contexts.”¹²⁹ Alternatively, he is a limited purpose public figure with respect to the issue of his reputation in the anime industry, by voluntarily injecting himself into the public debate about his misconduct in order to influence public perception among his fans, animation studios, and convention organizers.¹³⁰

Plaintiff publicly inserted himself into the dispute on at least four separate occasions: (1) on January 19, 2019 when he encouraged his followers to do whatever they could to counter the “lies;” (2) broadcasting apologies on January 20, 2019 and February 13, 2019; (3) submitting a written statement for inclusion in the Gizmodo article published on February 4, 2019; and (4) endorsing the GFM War Chest on February 20, 2019.¹³¹

This generated significant media coverage since filing his lawsuit, including a conspicuously timed feature in *Variety* released on the same day he filed the Petition.¹³² Clearly Plaintiff has more than a trivial or tangential role in the controversy, and has actively sought to influence the controversy through the media.¹³³

¹²⁷ See *Anderson v. Durant*, 550 S.W.3d 605, 617–18 (Tex. 2018).

¹²⁸ See *St. Amant v. Thompson*, 390 U.S. 727, 731 (1968).

¹²⁹ *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 351 (1974).

¹³⁰ See *supra* Section II, ¶¶ 10-12; *Gertz*, 418 U.S. at 351.

¹³¹ See *supra* Section II, ¶¶ 30-36, 40-43; *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 572–73 (Tex. 1998) (“By publishing your views you invite public criticism and rebuttal; you enter voluntarily into one of the submarkets of ideas and opinions and consent therefore to the rough competition in the marketplace.”) (citations omitted); *Mohamed v. Ctr. for Sec. Policy*, 554 S.W.3d 767, 775 (Tex. App.—Dallas 2018, pet. denied) (“by choosing to engage in activities that involved increased public exposure and media scrutiny, Mohamed and A.M. played more than a trivial or tangential role in the controversy”).

¹³² See Ex. P(8) <https://variety.com/2019/gaming/news/vic-mignogna-sues-funimation-1203193225/>.

¹³³ *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 572–73 (Tex. 1998). The dispute has even attracted the attention of North Carolina attorney Greg Doucette https://twitter.com/greg_doucette/status/1139656018261086214 along with over fifty attorneys from around the United States that comment on updates in the case, analyze the legal issues, and respond to Plaintiff’s supporters in a thread called the “Threadnought.”

Plaintiff cannot show with any certainty that any communication attributable to Moving Defendants caused him any specific harm, especially as distinct from the numerous other sources of allegedly defamatory statements made in publications, lists online, or due to his being fired by Funimation and Rooster Teeth.¹³⁴ In fact, Plaintiff acknowledges that he is unable to provide clear and specific evidence that *Moving Defendants'* communications have defamed him or cost him to lose any work, describing his reputation as having suffered a “death by a thousand cuts....”¹³⁵ Plaintiff’s reputation, such as it was, may in fact be dead, but he cannot show by clear and specific evidence that Moving Defendants’ communications caused that death.

The Court should dismiss Plaintiff’s defamation claims.

2. Plaintiff cannot show clear and specific evidence for his claims of tortious interference with contract against the Moving Defendants.

For his tortious interference with contract claim to succeed, Plaintiff must show: (1) that an existing contract subject to interference exists; (2) that the alleged act of interference was willful and intentional; (3) that the willful and intentional act proximately caused damage; and (4) that actual damage or loss occurred.¹³⁶ Plaintiff never had, prior to filing this lawsuit, any evidence the Moving Defendants caused him to lose any conventions.¹³⁷

The Court should dismiss Plaintiff’s tortious interference with contract claims.

(<https://docs.google.com/spreadsheets/d/1qNofncCm7DBcmDq3qVwhTonzHvJRIJCile7Td43xTNo/edit#gid=160584561>) (Ex. S).

¹³⁴ See *Bos v. Smith*, 556 S.W.3d 293, 307–08 (Tex. 2018) (“Grandfather’s statement to DFPS was but a small part in the plethora of negative accusations against him by Mother and Bruno, most of which concerned false sexual-abuse allegations against his sons. Indeed, as the trial court found, Mother’s defamation and wrongful detention of Mike was “the primary and root cause of damages awarded in this judgment.” Father linked none of his damages to Grandfather’s specific statements.”).

¹³⁵ Mignogna Depo. at p. 231 (Ex. A).

¹³⁶ *Prudential Ins. Co. of Am. v. Fin. Review Services*, 29 S.W.3d 74, 77 (Tex. 2000); *ACS Inv’rs, Inc. v. McLaughlin*, 943 S.W.2d 426, 430 (Tex. 1997).

¹³⁷ See Mignogna Depo. at pp. 110, 141, 157, 172-173, 206 (Ex. A).

3. Plaintiff cannot show clear and specific evidence for his claims of tortious interference with prospective business relations against the Moving Defendants.

For his claims for tortious interference with prospective business relations to succeed, Plaintiff must show: (1) there was a reasonable probability that the plaintiff would have entered into a business relationship with a third party; (2) the defendant either acted with a conscious desire to prevent the relationship from occurring or knew the interference was certain or substantially certain to occur as a result of the conduct; (3) the defendant's conduct was independently tortious or unlawful; (4) the interference proximately caused the plaintiff injury; and (5) the plaintiff suffered actual damage or loss as a result.¹³⁸

Like the tortious interference with contract claims, Plaintiff never had a basis to bring these claims.¹³⁹ The Court should dismiss Plaintiff's tortious interference with prospective contract claims.

4. Plaintiff cannot show clear and specific evidence for his claims of conspiracy against the Moving Defendants.

Incorporating by reference and applying the facts and rationale associated with Plaintiff's claims for defamation detailed herein, Moving Defendants respectfully submit that Plaintiff's claim for conspiracy necessarily fails for the same reason.¹⁴⁰ Moreover, if the Moving Defendants are actually employees of Funimation (which they are not), the conspiracy claim is effectively self-defeating.¹⁴¹

¹³⁸ *Coinmach Corp. v. Aspenwood Apartment Corp.*, 417 S.W.3d 909, 923 (Tex. 2013).

¹³⁹ See *Mignogna Depo.* at pp. 110, 141, 157, 172-173, 206 (Ex. A).

¹⁴⁰ See *Schoellkopf v. Pledger*, 778 S.W.2d 897, 900 (Tex. App.—Dallas 1989, writ denied) (observing that “the jury’s findings on conspiracy are relevant only if we find in [appellee’s] favor on one of the other tort theories pleaded,” and holding that because appellee “failed to establish any other substantive tort, . . . there is no independent liability for conspiracy”).

¹⁴¹ See *Texas-Ohio Gas, Inc. v. Mecom*, 28 S.W.3d 129, 138 (Tex. App.—Texarkana 2000, no pet.).

E. Even if Plaintiff Could Establish his Claims by Clear and Specific Evidence, Plaintiff Cannot Overcome Moving Defendants’ Qualified Privilege Defense.

Under the TCPA, even if the non-movant can make a showing of each essential element of his claims, the Court *still* must dismiss the action “if the moving party establishes by a preponderance of the evidence each essential element of a valid defense to the nonmovant’s claim.”¹⁴² The Moving Defendants are entitled to dismissal of the defamation claim and tortious interference with prospective business relations claims based on the defense of qualified privilege.¹⁴³ Ms. Rial, as the person assaulted, and Mr. Toye, as her fiancée, have an interest in the Funimation investigation, its result, and a right to defend themselves from attack online.¹⁴⁴ There is no dispute that Ms. Rial believes she was assaulted by Plaintiff, or that she was aware of and participated in the Funimation investigation.¹⁴⁵

Funimation, after conducting the investigation and talking with multiple witnesses and Plaintiff, chose to terminate him.¹⁴⁶ Mr. Toye, was aware of multiple allegations from victims concerning Plaintiff’s predatory actions, including his fiancée, Ms. Rial.¹⁴⁷ Further, the contemporaneous articles written about Plaintiff along with numerous statements by individuals online support Mr. Toye’s belief that Plaintiff was a predator.¹⁴⁸ Not only is what they said the

¹⁴² TEX. CIV. PRAC. & REM. CODE § 27.005(d).

¹⁴³ See *Cain v. Hearst Corp.*, 878 S.W.2d 577, 582 (Tex. 1994) (“Qualified privileges against defamation exist at common law when a communication is made in good faith and the author, the recipient or a third person, or one of their family members, has an interest that is sufficiently affected by the communication. See *Holloway v. Texas Medical Ass’n*, 757 S.W.2d 810, 813 (Tex.App.—Houston [1st Dist.] 1988, writ denied). A communication may also be conditionally privileged if it affects an important public interest.”); *Hanssen v. Our Redeemer Lutheran Church*, 938 S.W.2d 85, 93 (Tex. App.—Dallas 1996, writ denied) (“ORLC neither entertained serious doubts as to the truth of the statements nor made these statements with a high degree of awareness of their probable falsity. The communications appeared accurate, ORLC reasonably believed Shiffer, and church members and parents who received information had an interest in the funds and information about the funds.”).

¹⁴⁴ See *infra* Section II, ¶¶ 20-22, 35, 37; see Toye Depo. at pp. 41-42, 57-63, 71-72, 74, 119-120.

¹⁴⁵ See *infra* Section II, ¶¶ 20-22.

¹⁴⁶ See *infra* Section II, ¶ 35.

¹⁴⁷ See Toye Depo. at pp. 41-42, 57-63, 71-72, 74, 119-120.

¹⁴⁸ See *infra* Section II, ¶ 34.

truth, because Ms. Rial and Mr. Toye reasonably believed it, even if they were mistaken, they are not liable to Plaintiff based on the qualified privilege.¹⁴⁹

F. Plaintiff is Libel Proof.

Finally, setting aside the massive causation problem that Plaintiff has showing any statements by the Moving Defendants caused him injury, he is libel proof. Plaintiff is libel proof not only because of the Defamatory Articles, but based on his own admissions, *i.e.* persistent rumors of pedophilia (undoubtedly advanced by his public behavior with young girls), have followed him for years.¹⁵⁰ Under such circumstances, he is libel proof and therefore cannot establish damages.¹⁵¹

**VI.
CONCLUSION AND PRAYER**

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

- 1) Dismissal of all of Plaintiff's claims against the Moving Defendants;
- 2) An award of reasonable attorneys' fees and costs in accordance with the TCPA;
- 3) A hearing in which Plaintiff is present for cross-examination for determination of an appropriate sanction; and

¹⁴⁹ See *Hanssen*, 938 S.W.2d at 93.

¹⁵⁰ See *infra* Section II, ¶¶ 14-18, 25-30, 35-37.

¹⁵¹ See *Swate v. Schiffers*, 975 S.W.2d 70, 74-75 (Tex. App.—San Antonio 1998, pet. denied) (“Although the three statements Swate complains about may be false, the earlier newspaper articles and the disciplinary orders describe conduct that would have ruined Swate's reputation prior to the publication of Schiffers's article. For example, one disciplinary order established that Swate had failed to complete abortions performed on several patients, and that he had failed to repair lacerations which occurred during abortion procedures. As a result of this conduct, the Texas Board of Medical Examiners placed Swate on probation for five years. Another order established that Swate continued to function as a physician, despite having been placed on probation, by operating two methadone clinics. These actions, and others, were reported in the numerous newspaper articles that were included in the defendants' summary judgement evidence. While we need not include all of the details of these articles, let it suffice to say that Swate has been the target of extensive negative media attention for at least ten years, so much so that it is impossible to believe Swate's reputation could have been further damaged by the statements in Schiffers's article. Without injury, the trial court's order granting the defendants' motion for summary judgment was proper. As a result, we overrule this issue.”).

4) Such other and further relief to which the Moving Defendants may be justly entitled.

Dated: July 19, 2019.

Respectfully submitted,

/s/ J. Sean Lemoine

J. Sean Lemoine
State Bar No. 24027443
sean.lemoine@wickphillips.com
WICK PHILLIPS GOULD & MARTIN, LLP
3131 McKinney Ave., Suite 100
Dallas, Texas 75204
Telephone: (214) 692-6200

and

Cowles & Thompson
Casey S. Erick
State Bar No.: 24028564
901 Main Street, Suite 3900
Dallas, Texas 75202
Email: cerick@cowlesthompson.com

and

Andrea Perez
State Bar No.: 24070402
Email: aperez@kesslercollins.com
Kessler Collins, P.C.
2100 Ross Avenue, Suite 750
Dallas, Texas 75201
Tel. (214) 379-0732
Fax. (214) 373-4714

**ATTORNEYS FOR DEFENDANTS
MONICA RIAL AND RONALD TOYE**

CERTIFICATE OF SERVICE

I certify that on July 19, 2019, a true and correct copy of the foregoing was served on all counsel of record in accordance with Rule 21a of the Texas Rules of Civil Procedure.

/s/J. Sean Lemoine

J. Sean Lemoine

EXHIBIT A

DEPOSITION OF VICTOR MIGNOGNA

June 26, 2019

<p style="text-align: center;">1</p> <p style="text-align: center;">NO. 141-307474-19</p> <p>VICTOR MIGNOGNA,) IN THE DISTRICT COURT)) Plaintiff,)) VS.) TARRANT COUNTY, TEXAS)) FUNIMATION PRODUCTIONS,) LLC, JAMIE MARCHI, MONICA) RIAL, and RONALD TOYE,)) Defendants.) 141st JUDICIAL DISTRICT</p> <p style="text-align: center;">----- ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MIGNOGNA JUNE 26, 2019 -----</p> <p>ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MIGNOGNA, produced as a witness at the instance of the DEFENDANTS, and duly sworn, was taken in the above-styled and numbered cause on June 26, 2019, from 10:05 a.m. to 5:39 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto.</p> <p>Job No. 132281</p>	<p style="text-align: center;">3</p> <p>1 APPEARANCES (continued) 2 3 FOR THE DEFENDANT FUNIMATION PRODUCTIONS: 4 Mr. John Volney, Esq. LYNN PINKER COX & HURST, LLP 2100 Ross Avenue Suite 2700 Dallas, Texas 75201 6 (214) 981-3839 jvolney@lynnllp.com 7 8 FOR THE DEFENDANT JAMIE MARCHI: 9 Mr. Sam Johnson, Esq. JOHNSON SPARKS 7161 Bishop Road Suite 220 Plano, Texas 75024 11 (972) 918-5274 sam@johnsonsparks.com 12 13 FOR THE VIDEOGRAPHER: 14 Mr. John Franks 15 ALSO PRESENT: (Appearing via Zoom) 16 Ms. Jamie Marchi Mr. Ronald Toye Ms. Monica Rial 17 18 19 20 21 22 23 24 25</p>																																																																						
<p style="text-align: center;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1 2 3 FOR THE PLAINTIFF: 4 Mr. Ty Beard, Esq. Ms. Carey-Elisa Christie, Esq. 5 BEARD HARRIS BULLOCK HUGHES, PC 100 Independence Place 6 Suite 101 Tyler, Texas 75703 7 (903) 509-4900 ty@beardandharris.com carey@beardandharris.com 8 9 FOR THE DEFENDANTS RONALD TOYE and MONICA RIAL: 10 Mr. J. Sean Lemoine, Esq. Mr. Ethan Minshull, Esq. (Appearing via Zoom) 11 WICK PHILLIPS 3131 McKinney Avenue 12 Suite 100 Dallas, Texas 75204 13 (214) 692-6200 sean.lemoine@wickphillips.com 14 15 -and- 16 Mr. Casey S. Erick, Esq. COWLES & THOMPSON 901 Main Street Suite 3900 17 Dallas, Texas 75202 (214) 672-2000 cerick@cowlesthompson.com 18 19 -and- 20 Ms. Andrea Perez, Esq. (Appearing via Zoom) 21 KESSLER COLLINS, P.C. 2100 Ross Avenue Suite 750 22 Dallas, Texas 75201 (214) 379-0722 23 ap@kesslercollins.com 24 25</p>	<p style="text-align: center;">4</p> <p style="text-align: center;">I N D E X</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;"></th> <th style="width: 20%; text-align: right;">PAGE</th> </tr> </thead> <tbody> <tr> <td>Appearances.....</td> <td style="text-align: right;">2</td> </tr> <tr> <td colspan="2">VICTOR MIGNOGNA</td> </tr> <tr> <td>EXAMINATION BY MR. LEMOINE.....</td> <td style="text-align: right;">10</td> </tr> <tr> <td>EXAMINATION BY MR. JOHNSON.....</td> <td style="text-align: right;">235</td> </tr> <tr> <td>EXAMINATION BY MR. 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DEPOSITION OF VICTOR MIGNOGNA
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1 Exhibit 27 Screenshot of a tweet 2/8/19.....275
2
3 REQUESTED DOCUMENTS/INFORMATION
4
5 NO. DESCRIPTION PAGE
6 NONE
7
8 CERTIFIED QUESTIONS
9 NO. PAGE/LINE
10 NONE
11
12
13
14
15
16
17
18
19
20
21
22
23 *XXXX identifies redacted names in the transcript per
24 confidentiality stipulation
25

6

1 THE VIDEOGRAPHER: And we're going on the
2 record in the videotaped deposition of Mr. Victor
3 Mignogna. Today's date is June 26th, 2019. The time is
4 10:05 a.m.
5 At this time, will counsel please state
6 their appearances for the record, and then the court
7 reporter will swear in the witness.
8 MR. BEARD: Ty Beard for the Plaintiff.
9 MR. ERICK: Casey Erick for Defendants
10 Monica Rial, Ron Toye.
11 MR. LEMOINE: Sean Lemoine for the
12 Defendants Monica Rial and Ron -- Ron Toye.
13 MR. VOLNEY: John Volney for Funimation.
14 MR. JOHNSON: Sam Johnson for Jamie Marchi.
15 MR. BEARD: Go ahead and announce.
16 MS. CHRISTIE: Carey Christie for Vic
17 Mignogna.
18 MR. LEMOINE: And then we have appearing by
19 Zoom, which is a teleconference, we have Ethan Minshull
20 from Wick Phillips and Andrea Perez from Kessler
21 Collins. And, also, Ms. Marchi and Mr. Toye, and I
22 think Ms. Rial, are joining by Zoom.
23 And do you want to do the --
24 MR. BEARD: Yeah. We're on the record?
25 MR. LEMOINE: Yeah.

7

1 MR. BEARD: Okay. Counsel has agreed that
2 the only people that will be watching this live stream
3 are the parties and counsel, and that it will not be
4 recorded or otherwise distributed without agreement of
5 all the parties.
6 MR. ERICK: That's agreed.
7 MR. LEMOINE: That's correct.
8 MR. JOHNSON: That's agreed.
9 MR. LEMOINE: One other -- one other thing.
10 This lady sitting in the black with the gray sweater
11 hasn't introduced herself, has she?
12 MR. BEARD: No. She's Lisa Hansell, she's
13 our witness consultant.
14 MR. LEMOINE: Okay. She's a jury
15 consultant of some sort?
16 MR. BEARD: Witness, but, yeah, my -- my
17 office.
18 MR. LEMOINE: All right. One other
19 agreement, can we have an agreement that objection for
20 one of the Defendants is an objection for all, so we
21 don't jump all over each other?
22 MR. JOHNSON: Agreed.
23 MR. LEMOINE: All right. And I don't know
24 if everybody wants to do consecutive deposition
25 numbering so that it would be throughout the

8

1 depositions, since I suspect there will be a large
2 number of them, but, Mr. Beard, that's up to you.
3 MR. BEARD: In other words, one objection
4 that you guys -- that one person makes is deemed to
5 be --
6 MR. LEMOINE: Oh, I'm -- I'm sorry.
7 MR. BEARD: -- made for all?
8 MR. LEMOINE: That -- that's an agreement
9 for the Defendants, that way we don't have to keep
10 objecting.
11 MR. BEARD: I was wondering what I was
12 involved in.
13 MR. LEMOINE: The agreement, what I was
14 asking everybody at the table, because I can't dictate
15 this, is consecutive deposition numbering, meaning we
16 start today at 1, and if we go to 42, and then tomorrow
17 there's a new deposition, 1 through 42 stays set, you'll
18 have them, you can use the 1 through 42, and then any
19 new depositions would start at 43. That way, when you
20 go to trial and you're playing deposition testimony, the
21 42nd deposition exhibit is the same in every deposition.
22 Does that make sense?
23 MR. BEARD: No. But --
24 MR. JOHNSON: If I may jump in, he means
25 consecutive exhibit numbering.

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1 MR. BEARD: Oh, sure, yeah, that's fine.
2 MR. LEMOINE: What am I saying?
3 MR. JOHNSON: You're saying consecutive
4 deposition --
5 MS. CHRISTIE: Deposition.
6 MR. JOHNSON: -- numbering.
7 MR. BEARD: Yeah.
8 MR. LEMOINE: I got it.
9 MR. BEARD: Yeah, that's fine.
10 MR. LEMOINE: Okay. Any -- anything else
11 we need to discuss? Read and sign, I assume?
12 MR. BEARD: No.
13 MR. LEMOINE: Okay.
14 THE REPORTER: You don't want to read and
15 sign?
16 MR. BEARD: Oh, I'm sorry. Help me out
17 here.
18 MR. LEMOINE: Do you want Mr. -- is it
19 Mignogna?
20 THE WITNESS: Mignogna, yes, sir.
21 MR. LEMOINE: Very good. Mr. Mignogna to
22 read his deposition and sign it when it's over?
23 MR. BEARD: Oh, yeah.
24 MR. LEMOINE: Okay.
25 MR. BEARD: Absolutely. I'm sorry, I was

10

1 --
2 MR. LEMOINE: Yeah, I thought that's --
3 MR. BEARD: I was -- I was a thousand miles
4 away.
5 MR. LEMOINE: That's what I thought. All
6 right. Are we otherwise ready?
7 (Oath administered.)
8 THE REPORTER: This will be taken under the
9 Texas Rules of Civil Procedure?
10 VICTOR MIGNOGNA,
11 having been first duly sworn, testified as follows:
12 DIRECT EXAMINATION
13 BY MR. LEMOINE:
14 **Q. Would you state your name for the record.**
15 **A. Victor Joseph Mignogna.**
16 **Q. Mr. Mignogna, would you identify the woman with**
17 **the black shawl and gray shirt. Who is she?**
18 A. Her name is Lisa Hansell.
19 **Q. And what does she do for a living?**
20 A. For a living?
21 **Q. Yeah. Do you know?**
22 A. She does several things, but among other
23 things, she does makeup work and production work.
24 **Q. And when you say makeup work and production**
25 **work, is that in some kind of --**

11

1 A. For film and television.
2 **Q. Okay. Is she -- to your knowledge, has she**
3 **ever been a witness consultant?**
4 A. I don't know anything about --
5 **Q. As you sit here today, is she -- do you -- have**
6 **you hired her to be your witness consultant?**
7 A. I have not hired her.
8 MR. LEMOINE: Okay. Then I'm going to ask
9 that Ms. Hansell be excluded from the deposition.
10 MR. BEARD: Counsel, I hired her. But
11 that's fine, she can be excluded.
12 MR. LEMOINE: Okay.
13 (Ms. Hansell exits.)
14 **Q. (BY MR. LEMOINE) Have you ever been deposed**
15 **before, Mr. Mignogna?**
16 A. No, sir.
17 **Q. Have you ever had to give testimony in any**
18 **capacity before?**
19 A. Yes, sir.
20 **Q. In what capacity?**
21 A. I was a police officer for a time, and in my
22 job capacity, I -- I would have to testify against
23 defendants that I arrested and give testimony.
24 **Q. And when were you a police officer?**
25 A. A long time ago. Roughly '86, '87, in

12

1 Maryland.
2 **Q. And how long were you a police -- and how long**
3 **were you a police officer, a year?**
4 A. Roughly two years, on and off.
5 **Q. And when you -- when you say on and off, were**
6 **you some kind of auxiliary police officer?**
7 A. Well, no, I -- well, I was a -- I was a
8 seasonal officer, went through a -- the - the necessary
9 degree of training and sworn in, powers of arrest, etc.
10 **Q. Were you allowed to carry a pistol?**
11 A. Yes, sir. And -- I'm sorry.
12 **Q. Go ahead.**
13 A. And then at some point they realized that I had
14 a background in film and television and they asked me to
15 -- to start making PSAs and commercials for
16 pedestrian-related, citizen-related videos to help
17 educate the -- the -- the public. That's why I meant on
18 and off. I -- I started doing the video stuff toward
19 the end.
20 **Q. When did you stop being a police officer?**
21 A. It was just a couple of years, so, I guess, you
22 know, roughly -- again, I -- I don't remember the years,
23 specifically, but a couple of years.
24 **Q. And why did you cease being a police officer?**
25 A. It was never a career move, it was a -- it was

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

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

6 A. No, I voluntarily quit.

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

9 A. No.

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

12 A. Just spoken with my attorneys and prepared.

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

16 A. No, sir.

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

19 A. No, sir.

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

22 A. No, sir.

23 Q. What's your full name?

24 A. Victor Joseph Mignogna.

25 Q. How old are you?

14

1 A. Fifty-six.

2 Q. Do you ever go by any nicknames?

3 A. Vic.

4 Q. Is that it?

5 A. Yes.

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

8 A. No.

9 Q. Have any --

10 MR. BEARD: Excuse me --

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

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

14 MR. LEMOINE: The Fuhrer.

15 MR. BEARD: The Fuhrer?

16 MR. LEMOINE: Yeah.

17 MR. BEARD: As in Adolph Hitler?

18 MR. LEMOINE: I don't know.

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

20 MR. LEMOINE: Yes.

21 MR. BEARD: Okay. Sorry.

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

25 A. Yes.

15

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

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

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

12 A. Not to my knowledge.

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

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

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

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

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

25 A. Not to my knowledge.

16

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

4 A. I never condoned it.

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

8 A. I don't fully understand.

9 Q. Sure.

10 A. Can you rephrase?

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

16 A. Of course I do.

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

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

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

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

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1 think the fans might believe, but if you agree, they
2 would be --
3 A. I believe you asked me if they would -- if I
4 told them to stop, and I said no. And my answer to that
5 is, no, because they were fans and I knew they didn't
6 mean anything by it. Their intentions were nothing more
7 than playful, and so I didn't address it and it died
8 off.
9 Q. Does the Risembool Rangers, do they have a
10 definitions page somewhere?
11 A. I don't know.
12 Q. That's not something you have anything to do
13 with?
14 A. No, sir.
15 Q. Is there any adult that monitors this --
16 A. Yes.
17 Q. -- Risembool Rangers page?
18 A. Sorry. Sorry. Not supposed to overlap. I
19 apologize.
20 Yes.
21 Q. And who's that adult?
22 A. I don't -- I don't specifically know all their
23 names, but we have moderators. We've always had
24 moderators of legal age to make sure that any of the,
25 like, forums and -- and places where the fans would

18

1 gather to chat, were safe places where -- where there
2 wasn't any inappropriate discussions or challenges or
3 bullying.
4 Q. Okay. And so do you know who any of these
5 moderators are?
6 A. I know some -- they've changed over the years,
7 because, again, they're volunteers, they're fans who
8 just offered to help.
9 Q. And who screens them to make sure they're of
10 legal age?
11 A. I'm sorry?
12 Q. Who screens them to make sure they're of legal
13 age?
14 A. The other moderators who are of legal age.
15 Q. Who screens that moderator?
16 A. I'm sure at some point in time I -- I probably
17 had spoken to someone who I knew was of legal age.
18 Q. As you sit here today, can you identify one
19 person?
20 A. I'm sorry?
21 Q. As you sit here today, can you identify one
22 person who is of legal age that is a moderator on the
23 Risembool Rangers page?
24 A. Alyssa Fluty.
25 Q. And how old is she?

19

1 A. I don't know her birthday.
2 Q. How do you know she's of age?
3 A. Because she's clearly of age.
4 Q. All right. How many hours does miss --
5 A. She's out of college, she has a job, she's
6 clearly of age.
7 Q. How much time does she devote to the --
8 A. I have no idea, sir.
9 Q. -- moderator?
10 A. I'm sorry.
11 Q. Where do you currently live?
12 A. Grapevine, Texas.
13 Q. And how long have you lived in Grapevine?
14 A. Since late December of last year.
15 Q. And where did you live prior to that?
16 A. I went back and forth between Los Angeles and
17 Houston.
18 Q. Are you married?
19 A. No, sir.
20 Q. Have you ever been married?
21 A. Yes, sir.
22 Q. How long were you married?
23 A. Six -- a little over six years.
24 Q. From when to when?
25 A. '95 to 2000, mid 2000.

20

1 Q. Do you have any children?
2 A. No, sir.
3 Q. What's the highest level of formal education
4 you've ever obtained?
5 A. I have a bachelor's degree in science.
6 Q. Where did you get that?
7 A. Arts and science. From Liberty University.
8 Q. In Virginia?
9 A. Yes, sir.
10 Q. When did you graduate?
11 A. '86.
12 Q. And after you left Liberty, that's when you
13 became a police officer in Maryland?
14 And I know it's been a long time, so I'm
15 not trying to --
16 A. I know. So sorry.
17 Q. I'm not trying to trap you on dates.
18 A. No, I -- I -- I know, I'm just trying to work
19 it out. When I said on and off, if I may, I guess, if I
20 --
21 Q. Sure. Go ahead.
22 A. -- may clarify.
23 As I mentioned, I was a seasonal officer.
24 There are cities in Maryland that are vacation towns and
25 they hire additional officers for -- for the -- for the

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21

1 seasons. And my senior year in college, I was hired.
2 And then I went back to college so I wasn't there any
3 more. And then after college, I went back and did it
4 for another year and a half or so. That's what I meant
5 by on and off.

6 Q. Okay. Did you teach at a school after you
7 graduated Liberty University?

8 A. Yes, sir.

9 Q. What school did you teach at?

10 A. Trinity Christian Academy.

11 Q. Where's that located?

12 A. Jacksonville, Florida.

13 Q. What did you teach?

14 A. I taught English and speech.

15 Q. And how long did you teach there?

16 A. A year.

17 Q. And why did you leave?

18 A. Because, again, it was not a career move. It
19 was not my intention to be a teacher. It was an
20 opportunity that was offered to me right after college.

21 Q. Were you -- did you resign or were you
22 terminated?

23 A. I actually don't even recall.

24 Q. Were there any allegations of inappropriate
25 behavior between you --

23

1 A. Thirteen, twelve, thirteen.

2 Q. When was your first paying job in the movie or

3 --

4 A. I have no --

5 Q. -- TV production?

6 A. I have no recollection.

7 Q. How long would you say that you've been in the
8 public spotlight?

9 A. Being in the public spotlight is kind of
10 subjective, you know, like what one person would
11 consider celebrity or whatever, I don't --

12 Q. Okay.

13 A. I -- I -- I couldn't answer that.

14 Q. That's fair. Let me -- let me -- let me do it
15 this way. Do you consider yourself to be a celebrity?

16 A. No.

17 Q. Okay. Why not?

18 A. Because I don't.

19 Q. You've been in movies before?

20 A. Yes.

21 Q. You've been on TV shows?

22 A. Yes, sir.

23 Q. You have voice acted for, what, hundreds of
24 Japanese anime films?

25 A. Yes, sir.

22

1 A. Not to my knowledge.

2 Q. Let me get my question out.

3 A. Sorry.

4 Q. Were there any allegations of inappropriate
5 behavior between you and any students at this school in
6 Jacksonville that led to your resignation or
7 termination?

8 A. Not to my knowledge.

9 Q. And you would agree with me that if you were
10 terminated for inappropriate behavior or allegations of
11 inappropriate behavior with children, that's something
12 you'd remember?

13 A. Certainly. Of course it was 30 years ago.

14 Q. Okay. But even 30 years ago, if you were
15 accused of inappropriate behavior with children at your
16 first job after graduating the Christian school of
17 Liberty University --

18 A. Uh-huh.

19 Q. -- that's something that would stick with you,
20 isn't it?

21 A. Yes, sir.

22 Q. When did you first become involved in movies or
23 theater or TV production?

24 A. Since I was very young.

25 Q. All right. When --

24

1 Q. You go to conventions where thousands of people
2 show up?

3 A. Yes, sir.

4 Q. You've taken -- over the course of your, let's
5 say last 20 years, you've probably taken pictures with
6 over 10,000 people; is that fair?

7 A. I don't know an exact number.

8 Q. Well, I mean, is it more or less than 10,000?

9 A. I couldn't answer. I couldn't tell you.

10 Q. Well, how many people --

11 A. I haven't kept count. Sorry.

12 Q. Well, do you think it's more than 100?

13 A. Sure.

14 Q. All right. What's the last convention you went
15 to?

16 A. I was at an event last weekend in Dublin,
17 Ireland.

18 Q. How many people did you take pictures with
19 there?

20 A. I didn't count.

21 Q. More than 100?

22 A. Probably not.

23 Q. Do you consider yourself to be a celebrity in
24 the American voice actor community?

25 A. I don't feel like it's for me to say whether

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25

1 I'm a celebrity or not.

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

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

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

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

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

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

8 living?

9 A. I provide English voices for Japanese anime

10 that is -- that is dubbed into English.

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

12 we can use in this deposition for that?

13 A. Voice actor.

14 Q. American voice actor?

15 A. Voice actor.

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

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

18 has more celebrity than you?

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

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

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

22 than you?

23 A. No, I do not.

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

25 a voice actor, is that important to you?

26

1 A. Yes.

2 Q. Why?

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

4 MR. LEMOINE: Object as nonresponsive.

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

6 actor important to you?

7 A. Of course.

8 Q. Okay. Why?

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

10 reflects on me as a professional in a field.

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

12 reputation as a voice actor in your field?

13 A. I believe I do.

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

15 call, positive reputation?

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

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

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

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

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

21 conventions or Japanese anime films?

22 A. Yes, sir.

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

24 make a living?

25 A. Sorry?

27

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

2 A. Certainly.

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

4 public?

5 A. Yes, sir.

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

7 at these conventions?

8 A. Yes, sir.

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

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

11 A. I have no idea.

12 Q. More than 20?

13 A. Sure.

14 Q. More than 100?

15 A. Probably.

16 Q. More than 500?

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

18 wouldn't be able to comment specifically.

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

20 we're in right now?

21 A. The sizes of the rooms vary.

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

23 in?

24 A. They vary.

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

28

1 than this room?

2 A. They vary.

3 Q. Okay. What's the smallest?

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

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

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

7 they vary.

8 Q. Is your personal reputation important to you?

9 A. Yes, sir.

10 Q. Why is that? Why?

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

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

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

14 important to you?

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

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

17 Q. Anything else?

18 A. Nothing comes to mind at the time.

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

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

21 A. Yes, sir.

22 Q. It's not a power test.

23 With regard to your credibility, how has

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

25 your credibility?

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1 A. Mr. Toye has made a large number of public
2 assertions to which there is no evidence or proof.
3 They're very negative, they're -- they're defamatory.

4 Q. Okay.

5 A. And -- sorry.

6 Q. No, you get to answer until you're done.

7 A. No, go ahead. I'm -- I apologize.

8 Q. So Mr. Toye has made allegations that you would
9 consider to be incredible?

10 A. Yes, sir.

11 Q. All right. And so if those aren't credible
12 allegations, that really hasn't hurt your credibility,
13 has it?

14 A. There's a matter of public perception that I
15 think we can all agree is -- is pretty prevalent and
16 powerful these days.

17 Q. I understand what public perception is. I'm
18 trying to figure out whether or not somehow your
19 credibility has been hurt by what Mr. Toye has said.

20 A. Yes, I believe it has.

21 Q. Okay. How?

22 A. By altering the perception of people that make
23 decisions about my work and career.

24 Q. All right. And is Mr. Toye the only person
25 that's had this negative impact on the perception of

30

1 people that hire in your line of work?

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

3 Q. Other than Ms. Rial and Ms. Marchi, anyone else
4 that's done anything to hurt the -- your credibility in
5 the voice acting industry?

6 A. I'm sure.

7 Q. Can you identify any of them, as you sit here
8 right now?

9 A. No, sir, not -- not by name. Many of them are
10 screen names, you know, on a computer, you don't know
11 who they are, you don't know where they live, you know,
12 you -- you can't know, really.

13 Q. You would agree with me that the allegations
14 surrounding your alleged homophobia, anti-Semitism, and
15 sexual harassment are being discussed publicly, correct?

16 A. They are being discussed publicly, yes.

17 Q. And because of that public discussion, that's
18 hurting your credibility, isn't it?

19 A. Yes, sir.

20 Q. And it's not just Mr. Toye and Ms. Marchi and
21 Ms. Rial that are discussing that; is that correct?

22 A. Yes, sir.

23 Q. Are you suing anybody else, as we sit here
24 today?

25 A. No, sir.

31

1 Q. Have you sent retraction letters to anybody
2 else?

3 A. No, sir.

4 Q. Would you agree with me that the damage to your
5 personal reputation is also damaging to your fan base?

6 A. Possibly.

7 Q. Would you agree with me that if this litigation
8 was resolved in one form or fashion, that that would be
9 a benefit to your fan base?

10 A. Would you rephrase that, please?

11 Q. Yeah. If this litigation was resolved, that
12 would -- that would help your fan base, wouldn't it?

13 A. I don't know.

14 Q. Well, for instance --

15 A. I've never been involved in anything like this.
16 I don't really know what the outcome would be or how it
17 would affect anything.

18 Q. Okay. How about this for an example: If the
19 litigation was resolved today, your fan base could save
20 their money and not donate to the GoFundMe campaign
21 that's been set up for you. Would you agree with that?

22 A. I have nothing to do with that.

23 MR. LEMOINE: Objection, nonresponsive.

24 Q. (BY MR. LEMOINE) Would you agree with me that
25 if this litigation got resolved, then your fan base

32

1 wouldn't have to donate to your GoFundMe campaign?

2 A. They don't have to donate. No one is
3 compelling them to donate.

4 Q. And no one's asking them to donate?

5 A. I'm sorry?

6 Q. And no one's asking them to donate?

7 A. Not that I know of. I have nothing to do with
8 that.

9 Q. Do you know how the money is spent?

10 A. No, sir.

11 Q. So who makes sure the money is actually spent
12 for your benefit?

13 A. I didn't set it up. I don't know anything
14 about it.

15 MR. LEMOINE: Objection, nonresponsive.

16 A. I don't know.

17 Q. (BY MR. LEMOINE) So you have a GoFundMe
18 campaign out there in your name. Do you know how much
19 money is in it?

20 A. No, sir.

21 Q. You have no clue?

22 A. No, sir.

23 Q. So somebody is raising money with your name and
24 face on a GoFundMe page. Do you agree with that?

25 A. That's what I've been told, yes.

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

34

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

35

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

36

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

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1 A. No, sir.

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

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

4 Did you know that?

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

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

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

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

9 campaign?

10 A. No, sir.

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

12 occurred?

13 A. Define complete shock.

14 Q. Well --

15 A. That sounds rather, you know --

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

17 campaigns have been set up for your benefit, without

18 your knowledge, in your lifetime?

19 A. None that I'm aware of.

20 Q. So this is the first?

21 A. As far as I know.

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

23 it was set up, was he?

24 A. No, sir.

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

38

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

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

3 A. It was unexpected.

4 Q. Did you ever bless him doing that?

5 A. No.

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

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

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

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

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

11 people giving money to something. And that was the

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

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

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

15 wanted to help.

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

17 idea how the money is being spent?

18 A. No, sir.

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

20 A. No, sir.

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

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

23 over?

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

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

39

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

2 cause.

3 Q. And who picked the charitable cause?

4 A. I don't remember.

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

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

7 me how that money is being spent?

8 A. No, sir.

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

10 A. No, sir.

11 Sorry.

12 MR. LEMOINE: Objection.

13 A. I apologize.

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

15 responsibility to the --

16 MR. BEARD: Objection, form.

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

18 people that are putting money into this GoFundMe

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

20 spent?

21 MR. BEARD: Objection, form.

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

23 with that question?

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

25 Q. Are you going to answer it?

40

1 A. I'm responding to my --

2 MR. BEARD: You can answer the question,

3 I'm sorry.

4 A. -- attorney's objection.

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

6 to answer it, you have to answer it.

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

8 Q. Yeah.

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

10 A. Please repeat the question.

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

12 responsibility whatsoever to make sure that the money

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

14 it's spent?

15 MR. BEARD: Same objection. Objection,

16 form.

17 You can answer the question.

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

19 legal defense.

20 Q. (BY MR. LEMOINE) Okay.

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

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

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

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

25 what it is?

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1 (Exhibit 11 marked.)

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

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

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

5 campaign called Vic Kicks Back, that started on February

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

7 A. Yes, sir.

8 Q. Have you ever seen the GoFundMe page?

9 A. No, sir.

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

11 A. I haven't followed it.

12 MR. LEMOINE: Objection, nonresponsive.

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

14 ever seen the GoFundMe page?

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

16 before, but --

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

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

19 name is spent properly?

20 MR. BEARD: Objection, form.

21 A. Because I didn't start it.

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

23 A. I didn't request it.

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

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

42

1 didn't start it?

2 MR. BEARD: Objection, form.

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

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

5 artist.

6 MR. LEMOINE: Objection, nonresponsive.

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

8 artist and he is just taking money and doing whatever

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

10 MR. BEARD: Objection, form.

11 A. I have nothing to do with it.

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

13 right?

14 A. Correct.

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

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

17 you don't --

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

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

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

21 anything to do with them.

22 MR. LEMOINE: Object as nonresponsive.

23 There's no question on the table.

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

25 is a photo of you?

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1 A. Yes, sir.

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

3 photo?

4 A. No, sir.

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

6 Got to be 30, right?

7 A. Sorry?

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

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

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

11 been mid-40s.

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

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

14 communications, has anybody else told you how money that

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

16 spent?

17 A. No, sir.

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

19 show how it's being distributed?

20 A. No, sir.

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

22 attorneys to represent you?

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

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

25 them?

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1 A. Yes.

2 Q. All right. And does the engagement agreement

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

4 contingency fee agreement?

5 A. I don't recall.

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

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

8 you've not paid him any money?

9 A. No, sir.

10 MR. BEARD: Counsel?

11 MR. LEMOINE: Yeah.

12 MR. BEARD: Can I interrupt? Off the

13 record just a second.

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

15 the record.

16 THE VIDEOGRAPHER: And we're going off the

17 record, the time is 10:43.

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

19 THE VIDEOGRAPHER: And we're back on the

20 record at 10:43.

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

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

23 the Bataan Death March.

24 A. Okay.

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

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

2 A. Yes, sir.

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

4 A. Yes, sir.

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

6 about your engagement with your attorney.

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

8 Beard any money?

9 A. No, sir.

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

11 A. Yes.

12 Q. Who was that, if you remember?

13 A. Tonya.

14 MR. BEARD: Tonya something.

15 A. Tonya --

16 MR. BEARD: Meier?

17 A. Yes, Tonya Meier or Meiers.

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

19 Dallas-Fort Worth?

20 A. Yes, sir. Yes, sir.

21 Q. And how long did she represent you?

22 A. A few weeks.

23 Q. And you paid her some money?

24 A. Yes, sir.

25 Q. Are there any other attorneys that you have

46

1 paid in association with the --

2 A. No, sir.

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

4 who have donated to this GoFundMe campaign?

5 A. No, sir.

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

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

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

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

10 set one up and I wanted to tell you.

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

12 ahead of time?

13 A. Correct.

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

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

16 there?

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

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

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

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

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

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

23 did not object.

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

25 of setting up the GoFundMe campaign, that would be

47

1 incorrect?

2 A. I did not object to it.

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

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

5 wondering if you approved him doing that.

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

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

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

9 Q. Okay.

10 A. That he had done it.

11 (Exhibit 17 marked.)

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

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

14 Exhibit 17. Do you recall issuing a tweet on

15 February 20th, 2019?

16 A. Not offhand, but --

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

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

19 you off of --

20 A. Uh-huh.

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

22 Do you recognize this?

23 A. Yes, sir.

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

25 A. Yes, sir.

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

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

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

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

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

6 First question, the friend that expressed

7 that desire is Nick Rekieta?

8 A. Yes, sir.

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

10 expressed that desire, you approved it?

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

12 MR. LEMOINE: Objection, nonresponsive.

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

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

15 expressed that he had already done it.

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

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

18 followers -- how many do you have?

19 A. Twitter followers?

20 Q. Twitter followers.

21 A. Roughly, 113,000.

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

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

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

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

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1 A. No, sir, I did not.
2 Q. In fact, what you said was you gave it -- what
3 it appears to be is you gave it your blessing, didn't
4 you?
5 MR. BEARD: Objection, form.
6 Q. (BY MR. LEMOINE) "I approved his kind offer
7 and am so grateful," that's -- that's Nick -- that's Vic
8 Mignogna blessing the GoFundMe?
9 A. Well, I -- I wanted to communicate that I was
10 aware of it, and --
11 Q. And grateful, right?
12 A. And grateful.
13 Q. Yeah.
14 A. Certainly.
15 Q. And grateful.
16 A. Certainly.
17 Q. Because you-all are going to take that money,
18 and you-all are going to sue some women into the dirt,
19 aren't you, Mr. Mignogna?
20 MR. BEARD: Objection, form.
21 A. I'm sorry, say that again.
22 Q. (BY MR. LEMOINE) You-all are going to take
23 that money and you're going to grind some women down
24 into the dirt with this lawsuit?
25 MR. BEARD: Objection, form.

50

1 Q. (BY MR. LEMOINE) That's what you were going to
2 do?
3 A. No, sir.
4 Q. That's not what happened?
5 A. No, sir.
6 Q. I mean, where has the money been spent?
7 MR. BEARD: Objection, form.
8 A. You -- I don't know. As I mentioned in an
9 early -- to an earlier question.
10 Q. (BY MR. LEMOINE) You've sued Mrs. -- you've
11 sued Mrs. Rial?
12 A. Yes, sir.
13 Q. You've sued Ms. Marchi?
14 A. Yes, sir.
15 Q. Hadn't sued anybody else, right?
16 A. Mr. Toye.
17 Q. Mr. Toye.
18 A. Not yet, in answer to your question, anybody
19 else.
20 Q. Are there other people you plan on suing?
21 A. Possibly.
22 Q. Are there other people out there that have
23 damaged your reputation that I should know about?
24 A. Possibly.
25 Q. I mean, did they do more damage to your

51

1 reputation than my clients?
2 A. I don't think so.
3 Q. What was the money going to be used for?
4 MR. BEARD: Objection, form.
5 A. What was this money going to be used for?
6 Q. (BY MR. LEMOINE) Yeah.
7 A. Well, I would encourage you to read it
8 yourself.
9 MR. LEMOINE: Object as nonresponsive.
10 A. I will read it --
11 MR. BEARD: The witness answered the
12 question.
13 A. I will read it for you, sir. Oh, no, here.
14 The fund is set up for Vic's legal
15 defenses.
16 And as you know, as well, anything that was
17 left over was told, very clearly, that it would be
18 donated to charity.
19 Q. (BY MR. LEMOINE) Okay.
20 A. If this all ended tomorrow, the lion's share of
21 what -- of this money would go to charity, which, I'm --
22 I assume you would approve of.
23 MR. LEMOINE: So object as nonresponsive.
24 Q. (BY MR. LEMOINE) My first question is, so the
25 money in -- according to the GoFundMe page, is for your

52

1 defenses, correct?
2 A. That's my understanding.
3 Q. Are you being sued by anybody right now?
4 A. No, sir.
5 Q. So what is the money defending against?
6 A. That seems like a semantic to me. I think we
7 both know what it's for. It's -- it's --
8 Q. Oh, yes, we do.
9 A. It's for the lawsuit itself.
10 Q. That's right, it's for you to sue two women
11 that have accused you of sexual harassment --
12 MR. BEARD: Objection.
13 A. No, sir.
14 MR. BEARD: Objection, form.
15 Q. (BY MR. LEMOINE) Oh, it's not -- the money's
16 not for you -- for -- not to be used to help you sue two
17 women that have accused you of sexual harassment?
18 A. The money is -- is to be used for me to seek
19 justice for defamation of my reputation.
20 Q. Are you aware of any other GoFundMe campaign in
21 the entire United States where a man accused of sexual
22 harassment gets money to go sue his accusers?
23 A. No, sir.
24 Q. I mean, you're a unicorn, aren't you?
25 MR. BEARD: I'm sorry, could you say that

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1 again?

2 A. What do you mean?

3 Q. (BY MR. LEMOINE) I mean, you're literally the

4 only male in the entire United States accused of sexual

5 harassment who solicited money not to keep --

6 MR. BEARD: Objection, form.

7 Q. (BY MR. LEMOINE) -- himself out of jail, but

8 to go sue the harassers. Do you realize how unique you

9 are?

10 MR. BEARD: Objection, form.

11 A. Am I?

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

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

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

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

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

17 He's answered the question.

18 THE VIDEOGRAPHER: And we're going off the

19 record at 10:52.

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

21 THE VIDEOGRAPHER: And we're back on the

22 record for the beginning of disc number 2. The time is

23 11:00 a.m.

24 Q. (BY MR. LEMOINE) Mr. Mignogna, I'd like you to

25 pull Exhibit 17 back out, and we'll talk about it a

54

1 little bit more. Left-hand side of the page, top

2 column, there's a discussion there about public and

3 private apologies.

4 What are the private apologies that you

5 made?

6 A. Shortly after Monica publicly stated that I had

7 done something that upset or offended her in some way,

8 I had been friends, at least I considered us friends for

9 a very long time, and so I wrote Monica an email,

10 basically saying I -- I am mortified if I've done

11 something somewhere in the past to upset or offend you,

12 but I -- would you please tell me what it is because I

13 -- I didn't know in -- what she was referring to in her

14 tweets.

15 Q. Is that the only person you privately

16 apologized to?

17 A. Yes, sir.

18 Q. Okay. And so if I understand this correctly,

19 Ms. Rial publicly made statements about you that

20 reflected negatively upon you?

21 A. Yes, sir.

22 Q. Did they describe why she felt negatively about

23 you?

24 A. The first several -- for the first bit of time,

25 I can't tell you exactly how much -- how much time were

55

1 rather vague, and that was when I wrote her. As I said,

2 we'd been friends, my understanding, for 20 years.

3 Q. Okay. The public apologies, what would those

4 be?

5 A. I -- I put out a tweet at some point that just

6 basically said, I am extremely sorry for any unintended

7 -- certainly unintended offense or, you know, anything

8 that has hurt or offended anyone. Certainly never my

9 intention. And I also apologized publicly at an event.

10 Q. And -- and what -- what did you think you were

11 apologizing for?

12 A. Inadvertently offending them.

13 Q. And when you say inadvertently offending,

14 you're talking about giving hugs or kisses, and things

15 like that, people that didn't want it?

16 A. Whatever it was that -- that people had a

17 problem with.

18 Q. Like, now, were you also referring to instances

19 -- the various instances in your hotel room where it was

20 just you and a woman?

21 A. No, sir.

22 Q. Was that a part of it? So the public and

23 private apologies didn't apply to that?

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

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

56

1 of people have accused you of inappropriate behavior in

2 your hotel room at these various conventions. Do you

3 agree with that?

4 A. No, sir.

5 Q. You don't think that that's been -- you've been

6 accused publicly of inappropriate conduct in your hotel

7 room?

8 A. You said a number of people. I'm not aware of

9 a number of people accusing me of that.

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

11 people"?

12 A. Yes, sir, I am.

13 MR. BEARD: Objection, form.

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

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

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

17 MR. BEARD: Objection, form.

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

19 Q. (BY MR. LEMOINE) All right. Let me strike

20 that. Let me start this one over.

21 How many people do you know of that have

22 publicly accused you of inappropriate conduct in your

23 hotel room?

24 A. I don't know.

25 Q. More than one?

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1 A. Yes.

2 Q. More than five?

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

4 Q. Somewhere between one and five?

5 A. Possibly.

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

7 have accused you of this?

8 A. I certainly know some of them.

9 Q. And all false, right?

10 A. I'm sorry?

11 Q. And all false?

12 A. Anything that happened was consensual.

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

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

15 will go to the Salvation Army Dallas Domestic Violence

16 and Abuse Shelters.

17 Whose idea was that?

18 A. I don't recall, actually.

19 Q. But it wasn't yours?

20 A. No, sir.

21 Q. Have you ever donated to the Salvation Army

22 Dallas Domestic Violence and Abuse Shelters?

23 A. No, sir.

24 Q. Have you ever donated to any domestic abuse

25 shelters?

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1 A. No, sir.

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

3 A. No, sir.

4 Q. Ever donated to any organization designed to

5 stop sexual harassment?

6 A. No, sir.

7 Q. Have you ever been arrested?

8 A. No, sir.

9 Q. And this is your first lawsuit ever?

10 A. Yes, sir.

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

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

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

14 A. Okay.

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

16 produce in this lawsuit?

17 A. I'm sorry?

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

19 produce in this lawsuit?

20 A. Can you -- can you --

21 Q. Let me -- let me --

22 A. -- clarify?

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

24 documents are requested from inside. Your attorney has

25 requested documents from my clients, we've requested

59

1 them from you.

2 A. Uh-huh.

3 Q. Are you with me so far?

4 A. Yes, sir.

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

6 documents together for this lawsuit?

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

8 that was relevant, that --

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

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

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

12 him your computer?

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

14 or -- or --

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

16 to object to privileged -- to privilege.

17 MR. LEMOINE: Okay.

18 MR. BEARD: Don't answer.

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

20 selecting information that you forwarded to your client

21 [sic]?

22 A. Not to my knowledge.

23 Q. Did anybody provide you documents to provide to

24 your attorneys?

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

60

1 Q. Where did you look for information; file

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

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

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

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

6 really had were any emails or -- or documentation

7 online, mostly.

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

9 A. Stuff that might have been sent to me

10 anonymously.

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

12 expert look at your phone or laptop?

13 A. No, sir.

14 Q. Did you give your attorneys or anybody else

15 access to your phone or laptop?

16 A. No, sir.

17 MR. BEARD: That's fine.

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

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

20 requests for documents and it specifies what we're

21 looking for?

22 A. I believe my attorney was.

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

24 A. I believe he told me about it.

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

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1 that. How did you --

2 MR. BEARD: Off the record real quick.

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

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

5 have a question, we can --

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

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

8 think -- is that right?

9 MS. CHRISTIE: No.

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

11 of the deposition.

12 MR. BEARD: Subpoena duces tecum is all we

13 got.

14 MS. CHRISTIE: Just a subpoena duces tecum.

15 MR. LEMOINE: Oh, my apologies.

16 MR. BEARD: Accepted.

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

18 have been provided to your attorney were provided by

19 you. Did you have assistance pulling documents and

20 providing them to the attorneys?

21 A. Not to my knowledge.

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

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

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

25 A. Okay.

62

1 Q. Did you put that together?

2 A. No, sir.

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

4 attorneys?

5 A. No, sir.

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

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

8 A. Yes.

9 Q. And who is that?

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

11 Rangers fan club.

12 Q. And how old is she?

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

14 had to guess, probably mid-20s.

15 Q. Any idea why she would be producing documents

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

17 on it?

18 A. No.

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

20 macwarrior_m@msn.com?

21 A. No, sir.

22 Q. What about chebedragonessa47?

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

24 Q. Do you know who that is?

25 A. No, sir.

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1 Q. amandalynnmartin@yahoo.com?

2 A. No, sir.

3 Q. What about Jenna Gentry?

4 A. No, sir.

5 Q. Do you know who Martin Palmer is?

6 A. No, sir.

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

8 A. No, sir.

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

10 this Ms. Rial?

11 A. No, sir.

12 Q. None at all?

13 A. No, sir.

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

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

16 showing text messages from Mrs. Rial at conventions?

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

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

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

20 conventions and showing people text messages supposedly

21 from Monica Rial; is that true?

22 A. Not to my knowledge.

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

24 Kiwi Farms?

25 A. I've heard of it.

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1 Q. And do you know what it is?

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

3 gathering website. I've never been there.

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

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

6 the course of this incident.

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

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

9 of --

10 A. Yes, sir.

11 Q. -- allegations against you?

12 A. Yes, sir.

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

14 did you learn about it?

15 A. I don't even remember.

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

17 A. No, sir.

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

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

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

21 know.

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

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

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

25 to you?

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

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

7 A. No, sir.

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

10 A. No, sir.

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

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

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

20 A. No, sir.

21 (Exhibit 10 marked.)

22 Q. (BY MR. LEMOINE) Let me show you what we're
23 going to mark as Exhibit 10. I'll represent to you that
24 Ki -- that Exhibit 10 is a printout of Kiwi Farms and,
25 in particular, threads in the bottom left-hand corner.

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1 And what I want to do is take a look at page 10 -- I'm
2 sorry, page 2, at the beginning.

3 A. Okay.

4 Q. Page 2, there's a number of names, including
5 Mr. Toye, Mrs. Rial.

6 MR. BEARD: Page 10?

7 Q. (BY MR. LEMOINE) Pardon --

8 A. Page 2?

9 Q. Page 2.

10 MR. BEARD: Page 2. Okay.

11 A. Oh. They're -- are they printed on both sides?

12 Q. (BY MR. LEMOINE) Printed on the backsides.

13 A. Oh, okay.

14 Q. And if you look in the bottom -- bottom corner,
15 you see that Exhibit 10, page 2, it's called a Bates
16 label, at the very bottom of the document?

17 A. Down -- down here?

18 Q. Yeah. That's how I'll -- I'll direct you to
19 pages.

20 A. Okay.

21 Q. Okay. So first time you've ever seen this web
22 page?

23 A. Absolutely.

24 Q. Know anybody that -- that has anything to do
25 with Kiwi Farms?

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1 A. No.

2 Q. Any idea why these particular individuals might
3 be on this page?

4 A. No.

5 Q. Do you know any individuals identified on page
6 2?

7 A. Are you talking about these pictures?

8 Q. Yes.

9 A. Certainly, I know Jamie. I know who Daman
10 Mills is, I know who Amanda Winn Lee is, I know who
11 Monica Rial is, Ron Toye, Chris Sabat, Sean Schemmel,
12 Adam Sheehan, Jamie McGonnigal. They're all members of
13 the -- of the industry.

14 Q. And no idea why they might be on this page that
15 says "Doxemon," at the top, "Gotta catch 'em all"?

16 A. You'd have to ask the people that produced
17 this. I don't -- I didn't do it. I -- I've -- I've
18 never seen this before.

19 Q. And you understand that there are people who
20 have accused you of inappropriate acts that have not
21 disclosed their names, you're aware of that?

22 A. Yes.

23 Q. And -- and would you agree with me that you --
24 because they want to maintain their privacy, you would
25 not want those names disclosed publicly?

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

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

9 MR. BEARD: Objection, form.

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

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

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

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

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

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

24 A. No, sir.

25 Q. Have you received any death threats?

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1 A. No, sir.

2 Q. And you certainly don't want anyone receiving

3 death threats?

4 A. Absolutely not.

5 Q. Okay. Do you think you're a pretty good judge

6 of character of people?

7 A. Apparently not. I thought I was.

8 Q. And when did -- when did you start to doubt

9 your ability to judge people's character?

10 A. When people that I have known for many, many

11 years, who have treated me publicly, privately to my

12 face, in dozens of settings, as friends, and then spent

13 the last five months trying to ruin my career and

14 reputation.

15 Q. Okay. So besides the Defendants in this case,

16 is there anybody else that you would put in that bucket

17 of trying to ruin your career?

18 A. Oh, sure.

19 Q. Who -- how about this: I'll go through some

20 names.

21 Do you know who Michele Specht is?

22 A. Sure.

23 Q. Your former fiancée, correct?

24 A. Yes, sir.

25 Q. Is she a truthful person?

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1 A. Yes, sir, to a degree.

2 Q. Any reason why she would make up things about

3 you that you can think of?

4 A. You'd have to ask her that. I -- I'm not going

5 to speak for her.

6 Q. I'm not asking you to speak for her. I'm

7 asking you --

8 A. Do I -- you asked me if I thought she would do

9 that, and I said you'll have to ask her.

10 Q. What about Stan Dahlin, do you know who that

11 is?

12 A. Yes, sir.

13 Q. Who is he?

14 A. He ran a number of anime conventions.

15 Q. Truthful person?

16 A. As far as I know.

17 Q. Got any ax to grind with you, that you're aware

18 of?

19 A. Not as far as I know.

20 Q. All right. Do you know who Tammi Denbow is?

21 A. No.

22 Q. You never heard of Tammi Denbow?

23 A. No.

24 Q. D-E-N-B-O-W?

25 A. No.

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1 Q. Okay. What about Chuck Huber, do you know who

2 that is?

3 A. Sure.

4 Q. Who is that?

5 A. He is a fellow voice actor.

6 Q. Is he a friend of yours?

7 A. I would consider him so.

8 Q. Does he have some kind of talent agency

9 company?

10 A. I don't -- does he? I don't -- I don't know if

11 he does.

12 Q. Has he ever represented you in any capacity?

13 A. No, sir. Represented me in what way?

14 Q. In any way.

15 A. Not that I'm aware of. No, not that I --

16 nothing comes to mind.

17 Q. Have you ever discussed this lawsuit with Mr.

18 Huber?

19 A. Sure. He's a friend. I consider him a friend.

20 Q. Did you email and text about it?

21 A. Possibly. Definitely, you know, phone

22 conversation.

23 Q. What did you-all talk about?

24 A. When?

25 Q. What.

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1 A. I'm sorry. Just about the -- the online storm,

2 and then when Jamie and Monica started posting things

3 publicly, we spoke about that.

4 Q. And how long have you and Mr. Huber been

5 friends?

6 A. I -- I don't -- maybe -- I don't know, maybe 10

7 or 12 years, I -- I don't --

8 Q. Truthful guy?

9 A. As far as I know.

10 Q. How about Chris Slatosch, S-L-A-T-O-S --

11 T-O-S-C-H?

12 A. I don't really know him that well. He run --

13 he ran a convention here in Dallas that I attended.

14 Q. Is that Kameha Con?

15 A. Yes, sir.

16 Q. Did you email or text with Mr. Slatosch?

17 A. Yes, sir.

18 Q. What about?

19 A. What about?

20 Q. Yeah.

21 A. He invited me to his event last fall. I was

22 actually the first guest that he announced for his

23 Kameha Con this year. And -- and then when -- when this

24 eruption took place, shortly after it took place, Mr.

25 Slatosch called me and told me that he had been getting

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1 pressure from Monica and Chris Sabat to dump me as a
2 guest. And they made threats and -- and -- and put
3 pressure on him, and so he told me that he had no choice
4 but to cancel my appearance. And then I did not speak
5 with him for quite some time, like two or three months,
6 at least.

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

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

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

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

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

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

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1 **A.** Oh, you know, Greg is gay and he -- he thinks
2 that I am somehow against homosexuals, or something like
3 that. I'm conservative, Greg is not, and he's very
4 vocal about -- he was, for many years, that he didn't
5 like me much.

6 **Q. Okay. What about Donald Schultz?**

7 **A.** Don Schultz, don't know that name.

8 **Q. Chris Sabat?**

9 **A.** Sure.

10 **Q. Who is he?**

11 **A.** Chris is a voice actor, has been a voice actor
12 as long as I've been voice acting.

13 **Q. Truthful guy, as far as you know?**

14 **A.** No, sir.

15 **Q. Okay. So what -- do you and Mr. Sabat have
16 some kind of issue?**

17 **A.** Oh, no. See, that's the unfortunate part. Mr.
18 Sabat has looked me in the face, as long as I've known
19 him and been friend -- and acted like friends, pretended
20 to be supportive, told me that he was, you know, with me
21 and -- and for me, and then over the course of this
22 storm, it has come to my attention from different
23 people, that he has, as long as they have known him,
24 spoken disparagingly about me, made accusations behind
25 my back and not been a friend at all.

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

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

3 **A.** Yes, sir, I did.

4 **Q. Okay. Do you know a woman named Michelle
5 McConnell Blankenship?**

6 **A.** Not specifically by name.

7 **Q. Okay. What about Lynn Hunt?**

8 **A.** No, sir.

9 **Q. Whitney Robinson Falba?**

10 **A.** No, sir.

11 **Q. Greg Ayres?**

12 **A.** Sure. Greg's a voice actor, been a voice actor
13 for years with me.

14 **Q. Truthful, as far as you know?**

15 **A.** (Witness nods.)

16 **Q. No?**

17 **A.** I -- I -- that's problematic.

18 **Q. Okay. So -- so --**

19 **A.** Greg has never really liked me much.

20 **Q. Okay.**

21 **A.** And I've -- and I've known that. He's spoken
22 negatively about me to fans, and publicly, for many
23 years.

24 **Q. And what's he said publicly that was negative
25 about you?**

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1 **A.** So, as I mentioned, apparently I don't have
2 the greatest luck when it comes to judging people's
3 friendship.

4 **Q. And who -- who told you that Mr. Sabat was
5 speaking -- had been speaking negatively about you?**

6 **A.** Several people.

7 **Q. And who are they?**

8 **A.** Chuck Huber, for one.

9 **Q. Anybody else? If you -- if you -- if it comes
10 to you, that's fine.**

11 **A.** Yeah, I'm -- yeah, I'm sorry, I can't.

12 **Q. How about Faisal Ahmed?**

13 **A.** Faisal works with conventions.

14 **Q. How long have you known him?**

15 **A.** I know who he is because, you know, in your
16 interactions going to a convention, you interact with
17 somebody for a weekend who's running the show or who's
18 in charge of the show in some way, but I don't really
19 know him, he doesn't know me.

20 **Q. Jim Gogal, do you know that name?**

21 **A.** No, sir.

22 **Q. All right. Adam Sheehan, do you know that
23 name?**

24 **A.** Yes. Adam used to work at Funimation.

25 **Q. Truthful, as far as you know?**

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1 A. I don't know him well enough to be able to make
2 that judgment.
3 Q. Okay. Emmett Plant, do you know that person?
4 A. No, sir.
5 Q. Neysha Perry?
6 A. No, sir.
7 Q. Dayna Price, do you know that name?
8 A. No, sir.
9 Q. Todd Haberkorn?
10 A. Sure.
11 Q. Who is he?
12 A. Todd is a voice actor I've known for a while, a
13 long time.
14 Q. Do you consider him a friend?
15 A. Yes.
16 Q. Consider him truthful?
17 A. He has his moments.
18 Q. Any ax he has to grind with you, that you're
19 aware of?
20 A. Apart from -- honestly, apart from just the --
21 the normal kind of rivalry, competitive rivalry, I -- I
22 will even tell you I -- you know, I've -- I've made
23 jokes and, you know, things at Mr. Haberkorn's expense
24 that I have apologized to him for. We have a -- a long
25 history of friendship and conflict, and friendship and

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1 conflict, and friendship and conflict.
2 Q. Kaylan Saucedo --
3 A. No.
4 Q. -- do you know that name?
5 A. Well, I -- I -- I -- I've heard the name. I --
6 I mean, I've heard the name because I -- I know that
7 she's been part of this Twitter online situation.
8 Q. But she's not somebody you know?
9 A. No, sir. I wouldn't -- I wouldn't know her if
10 she walked up to me right now.
11 Q. Janna Bruss?
12 A. No.
13 Q. Tara Sands?
14 A. No.
15 Q. Jessie Pridemore?
16 A. Oh, wait. Janna Bruss is married to Jerry
17 Jewel. Yes, I know who Janna is, but I have not
18 interacted with her in years.
19 Q. Do you know who Jessie Pridemore is?
20 A. I've heard the name.
21 Q. But you've -- have you ever met her?
22 A. I'm -- I've met her. I'm sure I've met her.
23 She attended a lot of conventions, and I'm sure I've met
24 her over the course of time. I've met an awful lot of
25 people.

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1 Q. How about Kara Edwards, do you know who that
2 is?
3 A. Sure. She is a voice actress.
4 Q. All right. Is she truthful, as far as you
5 know?
6 A. Depends on what she says.
7 Q. Well, as you sit here today, have you known any
8 instances where Mrs. Edwards has lied?
9 A. My understanding is that she has recounted
10 interaction between us inaccurately, that I would take
11 issue with.
12 Q. Okay. Do you know what -- how do you know
13 that? Did somebody tell you that?
14 A. I -- I assumed that, because there was an
15 article written that quoted an anonymous source, and I
16 -- just from reading this -- the account, I deduced that
17 it was Kara.
18 Q. How about James Prager?
19 A. No, sir.
20 MR. BEARD: I want to be sure that's on the
21 transcript.
22 MR. LEMOINE: Let's go off -- let's go off
23 the record.
24 THE VIDEOGRAPHER: We're off the record at
25 11:29.

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1 (Break taken from 11:29 a.m. to 12:54 p.m.)
2 THE VIDEOGRAPHER: And we are back on the
3 record for the beginning of disc number 3. The time is
4 12:54.
5 Q. (BY MR. LEMOINE) Has Chuck Huber ever been
6 authorized by you, or to your knowledge, to try and
7 settle this lawsuit?
8 A. Authorized?
9 Q. Yes.
10 A. Define authorized, if you would, please.
11 Q. Did you tell Mr. Huber, Go settle this lawsuit
12 for me?
13 A. No.
14 Q. Okay. Have you ever been diagnosed as a sex
15 addict?
16 A. No.
17 Q. Have you ever received treatment for -- as a
18 sex addict?
19 A. No.
20 Q. Is there any -- anyone ever told you that they
21 thought you were a sex addict?
22 A. Not to my knowledge.
23 (Exhibit 12 marked.)
24 Q. (BY MR. LEMOINE) I'm going to show you what
25 I've premarked as Exhibit 12.

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1 A. Okay.

2 Q. I will represent to you that is an email that

3 was sent to Ms. Rial in March of 2013 by a person

4 identifying themselves as Chuck Huber.

5 First question, looking at the first page

6 of Exhibit 12. Do you recognize fireflyworks@gmail.com,

7 is that an email you're familiar with?

8 A. Yes, sir.

9 Q. And whose email is that?

10 A. Chuck Huber's.

11 Q. All right. If you would, using the Bates label

12 at the bottom, if you would turn to page 3 of

13 Exhibit 12.

14 A. Uh-huh.

15 Q. First full email in the middle of the page.

16 A. Yes, sir.

17 Q. Appears to be from Chuck Huber on March 6,

18 2019, and then it says from Vic Mignogna. My name is

19 Vic Mignogna and I'm a -- a sex addict.

20 Any idea why Mr. Huber would be emailing

21 something like that to Monica Rial?

22 A. You'd have to ask Mr. Huber.

23 Q. All right. Certainly nothing that you were

24 authorized --

25 A. No, sir.

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1 Q. -- that you authorized him to do?

2 A. He wrote this.

3 Q. Have you ever seen this document before?

4 A. Yeah.

5 Q. When?

6 A. I -- I don't remember. He was -- he considers

7 himself a friend of many of the parties involved, and

8 apparently he wanted to try to see if he could help, and

9 he crafted this. I didn't authorize any of it.

10 Q. And so did he email it to you or just tell you

11 about it?

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

13 Q. And do you have a policy of deleting emails the

14 same as you do regarding deleting texts?

15 A. Well, I get a lot of emails, sir.

16 MR. LEMOINE: Objection, nonresponsive.

17 Q. (BY MR. LEMOINE) Do you have a policy of

18 deleting emails the same as you do of deleting texts?

19 A. Once I read them, they go into an old mail

20 folder, but I don't, like, permanently delete them, no.

21 Q. (BY MR. LEMOINE) Okay. So if Mr. Huber sent

22 you this email, it would be in your -- in some folder --

23 A. Yes, sir, I suppose so.

24 Q. And just -- I know that this is your first

25 litigation so just -- so you know, there's a concept in

83

1 litigation called spoliation.

2 A. I'm sorry, what is it called?

3 Q. There's a concept called spoliation.

4 A. Spoliation?

5 Q. S-P-O-I-L-A-T-I-O-N [sic].

6 A. Okay.

7 Q. As in to spoil something.

8 A. Oh, okay.

9 Q. And -- and one of the things with regard to

10 spoliation is that when litigation starts, you shouldn't

11 delete relevant information. Do you follow me so far?

12 A. Sure.

13 Q. So, for instance, you shouldn't do anything to

14 delete emails off your computer --

15 A. Of course.

16 Q. -- or phone, things like that. You understand?

17 A. Yes, sir.

18 Q. All right. Thank you.

19 Okay. So very clear in your mind that Mr.

20 Huber was not authorized to send this email saying that

21 Vic Mignogna is a sex addict?

22 A. I didn't -- I did not consult with him or agree

23 to any of this. He wrote this.

24 Q. Okay. And when you -- when you saw it, did you

25 ask him the question of why are you telling -- saying

84

1 that I'm a sex addict?

2 A. No. It never really got that far, because he

3 contacted me and said that Monica and Ron rejected what

4 he wrote.

5 Q. Okay.

6 A. It -- it didn't go very far at all.

7 Q. All right. If you turn to page 1 of

8 Exhibit 12. I want to start from the top, the second

9 email on March 26, 2019, at 4:06 p.m. Are you with me?

10 A. 4:06.

11 MR. BEARD: Sorry, Counsel, which -- which

12 page?

13 Q. (BY MR. LEMOINE) Page 1.

14 A. From Chuck at 4:06?

15 Q. Yes.

16 A. Yes.

17 Q. Are you with me?

18 A. Sure.

19 Q. All right. It says: Sean and Chris are not

20 going to show up in court for you. You will be on your

21 own.

22 Do you have any idea who he might be

23 referring to, the Sean and Chris?

24 A. The only Sean and Chris I know in this

25 situation are Sean Schemmel and Chris Sabat.

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1 Q. And who is Sean Schemmel?
2 A. He's a voice actor.
3 Q. And any idea why Mr. Huber would be referencing
4 Sean Schemmel in this -- in this email?
5 A. No, sir, you'll have to ask Mr. Huber.
6 Q. And do you recall receiving this part of the
7 email chain from -- where Mr. Huber forwarded it --
8 A. No, I don't recall. I don't recall if he sent
9 me this, because I don't recall seeing any -- any
10 correspondence between he and Monica. He told me that
11 he had sent something to her and -- and that they had
12 reject -- refused to agree to it.
13 Q. Okay. And did he ever have a discussion of
14 what the terms were that -- that he sent?
15 A. No. No, sir.
16 Q. Did you ask him what the terms were?
17 A. Not that I recall.
18 Q. So just so I understand, how did -- how did
19 this Chuck Huber involvement, how did it come to your
20 knowledge?
21 A. Well, as -- as you -- as you pointed out, we
22 talked about earlier this morning, Chuck has been a
23 friend, I've considered Chuck a friend for a long time,
24 and Chuck considers himself a friend of -- of Monica's
25 and Jamie's, as well, and I -- I assume he was troubled

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1 about the events and wanted to see if he could step in
2 and -- and help out.
3 Q. But totally operating on his own as to what --
4 A. Yes, absolutely.
5 Q. All right. Have you and Mr. Huber ever been
6 involved in any companies together?
7 A. Companies, no, sir.
8 Q. Do you own or control a company called
9 September the Movie, LLC?
10 A. No, sir.
11 Q. Any idea what that company is?
12 A. No, sir.
13 MR. BEARD: September the Movie?
14 MR. LEMOINE: Yep, LLC.
15 A. I know that Chuck -- no, I'm not even -- I
16 don't -- because I don't know. I'm sorry, I
17 shouldn't --
18 Q. (BY MR. LEMOINE) Yeah.
19 A. I shouldn't speculate, right? I don't know. I
20 -- I certainly don't have anything to do with that. I
21 don't know what it is.
22 Q. Okay. I'm going to -- this has been premarked
23 as Exhibit 13.
24 (Exhibit 13 marked.)
25 Q. (BY MR. LEMOINE) Again, I'll represent to you

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1 this is communications between Mr. Huber and Ms. -- Ms.
2 Marchi, or Marchi.
3 A. I think she -- yeah, I think does she say
4 Marchi, I think.
5 Q. Marchi?
6 A. Yes.
7 Q. I want to start on -- at the very top --
8 A. Uh-huh.
9 Q. -- from Ms. Marchi. Do you recall ever
10 receiving this particular email chain?
11 A. I -- I don't recall that. Like I said, I
12 recall Chuck telling me that they refused, so --
13 Q. All right. So if you look at the second email
14 on March 26th, 2019, at 3:55, from Mr. Huber. Are you
15 with me?
16 A. 3:55 p.m.?
17 Q. Yes, sir.
18 A. Yes, sir.
19 Q. I've discussed it with --
20 MR. BEARD: March 6th, right?
21 THE WITNESS: The second one.
22 Q. (BY MR. LEMOINE) It starts, I've discussed it
23 with them, they have the statements and have given their
24 input, I'm pushing as hard as I can on both ends to try
25 and meet in the middle.

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1 Do you have any idea who he would have
2 given these statements to?
3 A. I'm sorry, any idea who Chuck --
4 Q. Yeah. Yeah, who he's referencing?
5 A. I -- I assume he's referencing Monica and
6 Jamie. I -- I assume.
7 Q. Okay. So he's writing to Ms. Marchi and saying
8 --
9 A. Oh, then he must have been referencing Ron and
10 Monica if he's writing to Jamie. I suppose he was
11 probably referencing me, as well.
12 Q. Okay. But certainly you disavow any knowledge
13 of receiving any statements from Ms. --
14 A. I said I don't recall.
15 THE REPORTER: Would you -- would you wait
16 until he's finished?
17 THE WITNESS: I'm so sorry. I'm so sorry.
18 THE REPORTER: Thank you.
19 THE WITNESS: I apologize.
20 THE REPORTER: It just helps, a clean
21 record.
22 THE WITNESS: Sorry.
23 THE REPORTER: Thank you.
24 Q. (BY MR. LEMOINE) Okay. So --
25 A. Sorry, Sean.

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1 Q. Yeah. You don't recall receiving any
2 statements from Mr. Huber where you would admit to
3 something like being a sex addict?
4 A. No, sir.
5 Q. And -- and as you sit here today, you don't
6 believe you're a sex addict?
7 A. No, sir.
8 Q. Are you seeking any mental anguish damages in
9 this lawsuit? Do you know?
10 A. No, sir.
11 Q. Okay. And so is that -- question was unclear.
12 Are you -- are you seeking mental anguish
13 damages?
14 A. There is certainly a lot of mental anguish.
15 Q. All right. Well, let me ask it this way.
16 A. I'm just seeking to clear my name, sir.
17 Q. Okay. And what would that look like? What
18 does clear your name mean?
19 A. To stop people from -- to -- to end the public
20 attacks, and to somehow reach an agreement where these
21 people do not contact events and production companies to
22 try to keep me from working and making a living.
23 Q. Okay. So are you seeking any treatment of any
24 type from any health care professionals as a result of
25 the defamation that you claim you've suffered?

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1 MR. BEARD: Objection, privileged.
2 Objection, privileged.
3 Do not answer.
4 Q. (BY MR. LEMOINE) Okay.
5 MR. BEARD: You can answer the question,
6 but any further delving into it, I'll object.
7 You can say yes or no.
8 MR. LEMOINE: I mean, maybe -- Mr. Beard,
9 maybe you can just clear this up.
10 Is he seeking mental -- are you-all seeking
11 mental anguish damages?
12 MR. BEARD: I think we've asked for broad
13 damages. Yeah, that's probably a part of it.
14 MR. LEMOINE: Okay. So --
15 MR. BEARD: You know, I mean, I don't -- I
16 don't have the pleadings in front of me, quite frankly.
17 MR. LEMOINE: All right.
18 Q. (BY MR. LEMOINE) Are you taking any medication
19 as a result of the defamation that you claim to have
20 suffered?
21 A. I am taking two medications. One is Losartan
22 for high blood pressure and one is Zoloft for -- I guess
23 it's an antidepressant.
24 Q. And did you take that before these allegations
25 came out?

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1 A. No. That started -- that started in mid, late
2 January.
3 Q. Okay. Have you been unable to work as a result
4 of any mental issues that you're suffering because of
5 this alleged defamation? Not that somebody is not
6 letting you work, but you can't get up and go to work.
7 Do you understand the distinction?
8 A. If I'm honest, and of course I -- I'm supposed
9 to be.
10 Q. If you want to --
11 A. I had -- for the first several months, I found
12 it very difficult to -- you know, to really do much of
13 anything. I had -- I had offers from people to do
14 certain things, and I, you know, found it very difficult
15 to -- to -- to get motivated.
16 Q. Did you do those --
17 A. I didn't sleep, I didn't eat, I was losing
18 weight.
19 Q. Did you do those things you had offers to do?
20 Did you turn them down?
21 A. I haven't done them. I asked them if I could
22 have some time.
23 Q. Okay. All right. As I understand it, you're
24 -- you may be seeking a million dollars or more in this
25 lawsuit?

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1 A. No, sir.
2 Q. No?
3 A. Not -- not that I'm aware of. I -- I haven't
4 -- I have not discussed any numbers of any kind of
5 monetary anything.
6 Q. All right. Do you believe that you've been
7 damaged as a result of the defamation of Mrs. --
8 A. Yes.
9 Q. Let me get the question out.
10 A. I'm sorry. I'm so sorry. Sorry.
11 Q. Do you believe that you have been damaged as a
12 result of the defamatory statements that you allege were
13 made by the defendants in this case?
14 A. Yes.
15 Q. Do you have a -- can you put a monetary value
16 on that?
17 A. No.
18 Q. What would you need to know to put a monetary
19 value on that?
20 A. If I may, Sean, let me answer by saying this:
21 I didn't -- I didn't want to do this. I sat by for five
22 months and let these people destroy me online. I didn't
23 even know what to do. I -- I -- I literally did not
24 respond. I did not attack back. I didn't even defend.
25 I just couldn't believe it was happening for five

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1 months.

2 And when it got to the point where I had

3 lost so much, I -- I realized that the -- my only

4 recourse was legal recourse. I wasn't looking for

5 money, I wasn't asking for anything but to be left alone

6 and -- and to -- you know, to be allowed to -- to have

7 my career and my work.

8 **Q. All right.**

9 MR. LEMOINE: I'm going to object as

10 nonresponsive.

11 **Q. (BY MR. LEMOINE) Tell me how, in 2018, how did**

12 **you make money? How did you generate a living? What**

13 **were things that you did?**

14 A. I -- I do voice acting. I write music for,

15 like, ad agencies, commercials, private individuals. I

16 do graphic design work. I act on camera and I do event

17 appearances.

18 **Q. Is one -- is one of those more lucrative than**

19 **the other on a given -- in every year?**

20 A. They're all over the place. They fluctuate.

21 **Q. So it just depends?**

22 A. Yes, sir.

23 **Q. And then when you say you write music, does**

24 **that mean you sing and -- and write, or just write**

25 **music?**

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1 A. No, sir. I play the piano and I sing, and I

2 write and I produce.

3 If you guys live in -- in this area, you

4 probably have heard a couple of my jingles on the radio,

5 so --

6 **Q. How many conventions, for these anime**

7 **conventions, how many of those do you attend a year?**

8 A. It varies. It fluctuates from year to year.

9 **Q. So you're not consistent?**

10 A. No, sir.

11 **Q. And do you typically have a contract with these**

12 **conventions, a written agreement?**

13 A. Sometime -- sorry. Sorry. Sometimes.

14 **Q. It just depends?**

15 A. Yes, sir.

16 **Q. And --**

17 A. Some of them -- if I may, some of them are run

18 by people that I've known for a while, and they're just

19 like, hey, do you want to come to my show? Okay.

20 **Q. Is that something you schedule out months,**

21 **years in advance?**

22 A. It -- again, it varies. Sometimes months in

23 advance, sometimes a year in advance, sometimes weeks in

24 advance, if I'm free.

25 **Q. Do you get paid by the convention to show up?**

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1 A. Occasionally.

2 **Q. How else do you make money when you attend the**

3 **conventions?**

4 A. Well, when the convention appearances started,

5 and Monica knows this as well as I do, a lot of the

6 events didn't pay anything. It was literally just kind

7 of helping build the industry, you know, promoting

8 projects we were working on. There wasn't any -- there

9 really wasn't any payment at all.

10 And, again, it fluctuates. Some

11 conventions will -- will give you a flat amount to

12 appear and you'll spend all weekend signing autographs.

13 Some events will just provide air fare and hotel and you

14 might -- you might make some money selling a headshot or

15 signing a picture, or --

16 **Q. Do most conventions that you go to, you sell**

17 **some type of merchandise?**

18 A. Yes.

19 **Q. Isn't that pretty standard at every convention?**

20 A. Yes, for -- for every voice actor.

21 **Q. And how do you keep track of the amount of**

22 **money that you get paid at conventions?**

23 A. I don't. My -- I have an accountant who takes

24 care of that.

25 **Q. And does the accountant go to the conventions**

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1 **with you?**

2 A. No, sir.

3 **Q. So is there someone there that collects the**

4 **money?**

5 A. Yes. The convention usually provides someone,

6 a handler or a liaison of sorts.

7 **Q. And are most of these transactions in cash?**

8 A. They vary.

9 **Q. Does the handler bring some type of device to**

10 **track, to swipe credit cards?**

11 A. Yes. There's a -- there's a Square card.

12 **Q. And at the end of the --**

13 A. A Square reader.

14 **Q. At the end of the convention, are you provided**

15 **a check or direct deposit or cash?**

16 A. Everything you just said. It varies.

17 **Q. And then you provide that to your accountant?**

18 A. Yes, sir.

19 **Q. Do you know what your gross income was in 2018?**

20 A. Not offhand. I'd have to check with him.

21 **Q. But your accountant would know?**

22 A. Yes, sir.

23 **Q. And I guess if I asked you that question for**

24 **2017 to 2014, it would be the same?**

25 A. Yes, sir.

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1 Q. And does your accountant also do your taxes?
2 A. Yes, sir.
3 Q. Has there been a drop off in the amount of
4 money that you have made in 2019, after these
5 allegations started coming out against you?
6 A. Yes, sir.
7 Q. How much?
8 A. I don't know. There -- there -- it's --
9 there's not a specific amount, because you don't know.
10 There are so many variables. You just -- you can't
11 know. But, obviously, if you don't go to an event,
12 you're not going to do anything. So any time -- you
13 know, going would obviously be different than not going.
14 Q. You said earlier that you sat by for five
15 months before you did anything with regard to these
16 allegations.
17 You would agree with me the GoFundMe
18 campaign started at the end of February 2019, correct?
19 A. I believe that's what your -- the exhibit you
20 gave me said. I -- I don't remember when it started.
21 Q. And -- and then you put a tweet out on
22 February 20th where you talk about hiring a law firm,
23 correct?
24 A. I -- I don't remember the date, but I -- I put
25 out a tweet if -- I put out very few tweets, and one --

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

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

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

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1 A. What do you mean what happened? May I ask what
2 you mean?
3 Q. You said the same day it was released, this
4 started. What -- what happened?
5 A. The social media attacks began and, like I
6 said, this has happened in the past, you know, so --
7 Q. All right. Prior -- prior to 2019, have you
8 ever been banned from a convention?
9 A. Not to my knowledge.
10 Q. And prior to 2019, have you ever been asked not
11 to come back to a convention?
12 A. Not to my knowledge.
13 Q. Prior to 2019, have you ever not gotten an
14 invitation to a convention that you attended a year
15 before?
16 A. Well, that's not unusual at all. Because once
17 the convention has you as a guest, they don't typically
18 bring the same people back every year because of the
19 number of people in the industry. In fact, I'm
20 actually -- I'm actually an exception because I -- I --
21 I -- I do -- I -- I do get invited back often to the
22 same events, so I -- if somebody doesn't invite me back,
23 there's nothing really unusual about that.
24 MR. LEMOINE: All right. Object as
25 nonresponsive.

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1 A. Okay.
2 Q. (BY MR. LEMOINE) Has anyone ever told you that
3 you are not welcome back at a particular convention?
4 A. No, sir.
5 Q. What about Metrocon, have you ever been not
6 invited back to Metrocon Tampa?
7 A. I was at Metrocon two years ago, sir.
8 Q. But you didn't -- so that would have been in
9 2017?
10 A. I -- I -- I think it was 2017.
11 Q. Didn't go back in 2018?
12 A. No, sir.
13 Q. Didn't get invited back in 2019?
14 A. No, sir.
15 Q. And do you know why?
16 A. No, sir.
17 Q. Okay. What about Anime Central, have you ever
18 --
19 A. I was at Anime Central, I believe, two years
20 ago, maybe three years ago.
21 Q. 2016 or 2017?
22 A. Yes, I've -- I've been there.
23 Q. And haven't been -- been back since that last
24 time?
25 A. No, sir.

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1 Q. All right. What about Tekkoshococon?
2 A. I was at Tekkoshococon last year.
3 Q. 2018?
4 A. Yes, sir.
5 Q. And did you get invited back for 2019?
6 A. No. As I said, typically with 70 or 80 voice
7 actors and industry people, writers, directors, artists,
8 they don't typically invite the same people back every
9 year.
10 MR. LEMOINE: Object as nonresponsive after
11 no.
12 Q. (BY MR. LEMOINE) What about the RTX, Rooster
13 Teeth Convention?
14 A. I attended that event two years -- two years
15 ago, and was not there last year, and was supposed to be
16 back there this year, but there -- the -- it was
17 rescinded, the invitation was rescinded.
18 Q. All right. What about Louisiana anime
19 MechaCon, have you ever been uninvited?
20 A. Not to my knowledge.
21 Q. When's the last time you went to that con?
22 A. I -- I don't know, sir. I don't remember.
23 Q. Do you know a woman named Kat Thompson?
24 A. Not -- no, don't believe so. Not by name.
25 Q. Okay. Are you familiar with a company called

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1 Sentai Filmworks? It's S-E-N-T-A-I.
2 A. I believe Sentai is the new company that was
3 formed in Houston. It's an anime dubbing company.
4 Q. What was the name of the company before then?
5 A. I believe it was ADV Films.
6 Q. Okay. And were you ever fired from either
7 Sentai or AD Film -- ADV Films?
8 A. No, sir. I moved.
9 Q. Okay. So you weren't -- you weren't fired by
10 them?
11 A. No, sir.
12 Q. Okay.
13 A. I moved -- I was living in Houston and I moved
14 to L.A., or started working more in L.A. I even came
15 back on a couple of occasions and worked at Sentai.
16 Q. What about Gear Box, have you ever been
17 terminated by Gear Box?
18 A. I don't think I have ever worked for Gear Box.
19 Q. Are you familiar with a company called Rooster
20 Teeth Productions, LLC?
21 A. Yes, sir.
22 Q. Just call it Rooster Teeth for short.
23 A. Yes, sir.
24 Q. What does Rooster Teeth do?
25 A. They dub -- they -- they produce, I believe,

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1 original animated content.

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

3 past?

4 A. Yes, sir.

5 Q. From when to when?

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

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

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

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

10 character in a show of theirs until I was terminated

11 earlier this year.

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

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

14 contractor?

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

16 believe.

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

18 employee and an independent contractor?

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

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

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

22 and -- and independent contractor is just hired per

23 project.

24 Is that close?

25 Q. I would say that's close.

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1 A. Okay.

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

3 W-2 and a 1099?

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

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

6 Q. That's right.

7 A. Okay.

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

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

10 Rooster Teeth?

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

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

13 really think about the distinction much.

14 (Exhibit 19 marked.)

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

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

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

18 signature?

19 A. Yes, sir.

20 Q. And you recognize this as an independent

21 contractor agreement --

22 A. Yes, sir.

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

24 A. Yes, sir.

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

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

2 last year.

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

4 any work under this independent contractor agreement for

5 Rooster Teeth?

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

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

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

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

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

11 dates, but I don't think so.

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

13 an hourly rate?

14 A. Yes.

15 Q. Which one?

16 A. Oh, sorry. Hourly rate.

17 Q. It's an hourly rate?

18 A. Yes, sir.

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

20 and they'd send you a check?

21 A. Yes, sir.

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

23 of --

24 A. No, sir.

25 Q. So not from Rooster Teeth?

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1 A. I wish. No, sir.

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

3 that Rooster Teeth was doing any type of investigation

4 into you?

5 A. No, sir.

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

7 Rooster Teeth; is that correct?

8 A. Yes, sir.

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

10 A. By email.

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

12 email?

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

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

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

16 interesting -- that I had been corresponding with a

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

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

19 He and I had been corresponding at the very

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

21 beginning, and expressed how unfortunate and how crazy

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

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

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

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

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

6 Q. Was there any explanation?

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

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

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

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

25 A. No, sir.

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

2 A. No, sir.

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

5 A. No, sir.

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

9 A. Yes, sir.

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

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

15 Q. And do you know if they responded?

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

18 Q. Okay.

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

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

23 A. Ms. Rial does.

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

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

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

6 A. Oh, yes.

7 Q. -- LLC, correct?

8 A. Yes.

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

11 A. Yes, sir.

12 Q. And what do they do?

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

14 Q. Similar to what Rooster Teeth does?

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

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

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

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1 Funimation, and I -- I lived in a hotel in -- in Irving
2 for 12 weeks and -- and directed a series for them.

3 I -- I -- I assume I was -- that was probably an
4 employee -- like a -- an employment thing. It was
5 different than the contracted voice actor thing.

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

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

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

13 A. Oh, yes.

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

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

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

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

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

25 A. I don't know.

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1 Q. Anybody ever told you Mr. Toye worked for
2 Funimation?
3 A. I can't recall that anyone has.
4 Q. Were you ever interviewed at any point in time
5 by Funimation with regard to allegations of improper
6 conduct by you?
7 A. I was contacted in mid-January, very shortly
8 after this -- the online social media stuff started, I
9 was contacted by someone at Funimation. Basically, it
10 was about a 20-second phone call where they basically
11 said, Someone from Sony would like to chat with you, can
12 you be available tomorrow at this time.
13 And so I said yes. And someone from Sony
14 contacted me and said that they had received some --
15 some incidents that they wanted to ask me about. And
16 that was the first I had heard of it.
17 Q. Okay. And that's the only time that -- that
18 you've ever dealt with any investigation --
19 A. Yes, sir.
20 Q. -- while at Sony?
21 A. Yes, sir.
22 Q. Does the name Tammi Denbow ring a bell to you?
23 A. Not off the top of my head, no, sir.
24 (Exhibit 24 marked.)
25 Q. (BY MR. LEMOINE) Let me show you what we've

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1 premarked as Exhibit 24.
2 Have you ever seen Exhibit 24 before?
3 A. Yes, sir.
4 Q. And what is Exhibit 24?
5 A. It was apparently an email that Sony sent to
6 me, and I replied.
7 Q. And starting at the top, page 1 of Exhibit 24,
8 vichthewop, that's your email?
9 A. Yes, sir.
10 Q. And I assume the wop is a cute reference, in
11 fact, of your Italian heritage?
12 A. Yes, sir.
13 Q. And then it says: Forwarding confidential
14 discussion to Lisa --
15 A. She's laughing at my name. No, I'm just
16 kidding.
17 Q. -- to -- to Lisa Hansell. That's the lady that
18 was here earlier in the deposition?
19 A. I'm sorry. Yes.
20 Q. If you look at the top of Exhibit 24, are you
21 with me, on page 1, very top?
22 A. Oh, yes.
23 Q. This is you forwarding this communication to
24 Ms. Hansell?
25 A. Uh-huh.

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1 Q. Why would you be forwarding a confidential
2 communication between you and someone at phony -- Sony
3 to Ms. Hansell?
4 A. Well, I don't consider it confidential between
5 me and my friends. I mean, this is my life, this is my
6 situation, and Lisa was a friend and I shared it with
7 her.
8 Q. Okay. Did you share it with anybody else?
9 A. No, sir.
10 Q. Did you and Ms. Hansell discuss the situation?
11 A. Not to my recollection, no.
12 Q. So you just forwarded it to her, and then there
13 were no discussions after the fact?
14 A. Not to my recollection, no.
15 Q. And is Ms. Hansell an employee or independent
16 contractor for you, or --
17 A. No.
18 Q. Just a friend?
19 A. Yes.
20 Q. And how long have you-all been friends?
21 A. Oh, maybe six, six or seven years.
22 Q. All right. If you would turn to page 4 of
23 Exhibit 24. Are you with me?
24 A. Uh-huh.
25 Q. All right.

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1 A. Yes, sir.
2 Q. The bottom of the page, Ms. Tanny -- Tammi
3 Denbow, does that refresh your recollection --
4 A. Yeah.
5 Q. -- of who she is?
6 A. Yeah, that's the woman you asked me about, yes.
7 Apparently, that's the name of the woman at Sony.
8 Q. Okay. So prior to January 25, 2019, you had
9 never met Ms. Denbow and didn't know who she was?
10 A. Not to my -- no, not to my recollection.
11 Q. All right. And January 25, 2019 is the first
12 time that you even knew that there was any kind of issue
13 --
14 A. Yes, sir.
15 Q. -- with your work?
16 All right. So did you have a conversation
17 with Ms. Denbow?
18 A. Yes. Yes, sir.
19 Q. Okay. What -- what do you recall of that
20 conversation?
21 A. She asked me about three incidents that had
22 come to their attention. The first one was a kiss with
23 a coworker at Funimation a few years earlier. One was
24 an interaction with Monica at a convention with a jelly
25 bean. And the third one was an incident that was

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

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

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

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1 A. I'm allowed to say -- is it okay if I say?
2 Q. You say it and we're going to -- we'll -- it
3 will be removed from the transcript --
4 A. Okay.
5 Q. -- until the court rules whether or not it's
6 allowed.
7 MR. BEARD: Yeah, you're going to have
8 to --
9 A. Okay. XXXX XXXXXXXXXX.
10 Q. (BY MR. LEMOINE) And who was Ms. XXXXXXXXXX?
11 A. She was an employee at Funimation.
12 Q. And do you know what her title was?
13 A. I believe she was a translator or a checker.
14 She would proofread and proof check subtitles.
15 Q. And when was this kiss that occurred?
16 A. At least three, two, three years ago.
17 Q. So 2019, so it's either 2016 or 2017?
18 A. It wasn't '17. So '15 or '16, I guess.
19 Q. And you were an independent contractor at
20 Funimation at the time?
21 A. Yes, sir.
22 Q. And the kiss occurred at the Funimation
23 offices?
24 A. Yes, sir.
25 Q. And it was only one -- one kiss?

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1 A. Yes, sir.

2 Q. Who kissed who? Or, how about this: Who

3 initiated the kiss?

4 A. I did. I asked her if I could kiss her, and

5 she said --

6 Q. And what did she say?

7 A. Yes -- no, actually, she said, close the door.

8 And I went over and -- and closed the door.

9 I'd visited her every time I was at the

10 studio. We -- you know, we had been kind of flirting

11 with each other and corresponding for quite some time

12 before that.

13 Q. And in 2015, you were engaged to Mrs. Specht;

14 is that correct?

15 A. Yes, sir.

16 Q. How long had you-all been engaged at that

17 point?

18 A. We got engaged in -- bear with me. Let me do a

19 little math. Roughly, seven years ago, so let's --

20 2012, 2013.

21 Q. Did you and Mrs. Specht have an exclusive

22 relationship?

23 A. Yes.

24 Q. Did you disclose to Ms. Specht at any time that

25 you kissed Ms. XXXXXXXXX?

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1 A. No.

2 Q. After you kissed, did it proceed from there?

3 A. Did what proceed?

4 Q. Your relationship, if you had one.

5 A. With Ms. XXXXXXXXX?

6 Q. Yes.

7 A. No.

8 Q. Why not?

9 A. I don't think either one of us were looking for

10 any kind of a, you know, ongoing long-term thing.

11 Q. And was there any other relationship beside --

12 physical relationship besides that one kiss?

13 A. With Ms. XXXXXXXXX?

14 Q. Yes.

15 A. No, sir.

16 Q. No? No sex or --

17 A. No, sir.

18 Q. -- sexual-related activities?

19 Anybody else at Funimation, that was

20 employed at Funimation, that you've kissed at any point

21 in time?

22 A. No, sir.

23 Q. So as far as you were concerned, Ms. XXXXXXXXX,

24 it was a consensual kiss?

25 A. Yes, sir.

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1 Q. And -- but it never -- never went anywhere

2 after that?

3 A. No, sir.

4 Q. Did you text or email Ms. XXXXXXXXX after that

5 incident?

6 A. I expect that we exchanged -- we exchanged a

7 few texts, yes, as a matter of fact.

8 Q. But she never pursued you after that kiss?

9 A. Well, not in any -- not in any sexual way.

10 Whenever I was in town recording, I would let her know,

11 and we talked about getting together sometime or having

12 lunch or something, but nothing heavy.

13 Q. Right. And when Ms. Denbow -- did Ms. Denbow

14 explain to you what the allegations were, or did she

15 just give you a name and say, what's the relationship?

16 A. Actually, she didn't give me any names, and I

17 asked her, Am I allowed to know who you're talking

18 about. And she -- she told -- that was the point at

19 which she told me their names.

20 Q. Okay. And -- but before she gave you the

21 names, did she describe the alleged incident that the

22 people had relayed to her?

23 A. Yes.

24 Q. Okay. So with regard to Ms. XXXXXXXXX, what

25 was -- what is your recollection how Ms. Denbow

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1 explained that interaction?

2 A. She said, do you recall going into someone's

3 office at Funimation and forcibly kissing them?

4 Q. And you knew at that point in time that the

5 only person that could make -- even remotely try and

6 make that allegation was Ms. XXXXXXXXX?

7 A. Well, I -- Ms. XXXXXXXXX was the only one that

8 I had gone into an office and kissed.

9 Q. Okay. If you're engaged to Ms. Specht, why

10 kiss Ms. XXXXXXXXX?

11 A. Because I made some mistakes.

12 Q. So is that not -- not the first mistake you

13 made in terms of your exclusive relationship with Ms.

14 Specht?

15 A. No.

16 Q. How many mistakes do you -- would you say you

17 made with Ms. Specht during the course of your

18 engagement?

19 A. I don't know.

20 Q. More than one?

21 A. Yes, sir.

22 Q. More than five?

23 A. Yes, sir.

24 Q. More than 50?

25 A. I doubt it.

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1 Q. More than 25?
2 A. I don't know.
3 Q. Okay. So with regard to the twin ladies, do
4 you know their names?
5 A. Yes.
6 Q. And who are they?
7 A. XXXX and XXXXX XXXX.
8 Q. And how do you know them?
9 A. They had come to at least three or four
10 conventions that I was a guest at. They would always
11 come to my autograph table and to my Q and A sessions
12 and sit in the front row and come and say hello, and --
13 Q. All right. And what was -- how did Ms. Denbow
14 explain that particular allegation?
15 A. She said, Do you recall inviting two girls,
16 twins, two women, to your room at a convention. And I
17 said yes. And she said, Do you recall forcibly kissing
18 one of them, which I did not.
19 Q. All right. So -- and what did you tell -- what
20 was your recollection that you relayed to Ms. Denbow?
21 A. My recollection was that I had seen these --
22 these two ladies at multiple conventions, and I was
23 under the very clear impression that they were
24 interested or attracted to me. And they were very kind,
25 attractive, friendly young ladies.

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1 A. No.
2 Q. -- or just you? Because that would be creepy,
3 right?
4 A. If they were consensual, just me.
5 Q. And while you were engaged to Mrs. Specht, had
6 you ever had that happen before, where you had
7 consensual sex with more than one woman --
8 A. No.
9 Q. -- at the same time?
10 A. No, sir.
11 Q. What about after your engagement with Ms.
12 Specht broke off?
13 A. No, sir.
14 Q. And while you were engaged with Ms. Specht, did
15 you have consensual sex with any women at any
16 conventions?
17 A. Yes, sir.
18 Q. How many?
19 A. I don't remember.
20 Q. More than 20?
21 A. No.
22 Q. Did you ever have -- while you were engaged
23 with Ms. Specht, did you ever have sexual relations with
24 any -- with a woman more than once?
25 A. Yes.

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1 And so after the fourth or fifth time that
2 I saw them at an event, one night or one day I asked, I
3 don't remember when, I asked them if they would -- if
4 they wanted to come to my room. I invited them to my
5 room. They came, voluntarily. I let them in. One of
6 them sat on the bed, the other one sat in a chair in the
7 room, and I sat in another chair in the room.
8 We made some small talk, and then they
9 asked me why I invited them to my room. And I said,
10 Well, I was under the impression that there was a lot of
11 mutual attraction going on here and I thought maybe you
12 might be interested in -- in some -- you know, in some
13 kind of a sexual interaction. They told me they were
14 not, I said okay, and they left.
15 Q. Do you remember what time frame this would be,
16 what year?
17 A. No. It was several years ago.
18 Q. It was while you were engaged to Ms. Specht,
19 though?
20 A. Yes, sir.
21 Q. And your intent in inviting them to your room
22 was to have sex with them?
23 A. If they were consensual.
24 Q. And did you want the -- the two sisters to have
25 sex with each other --

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1 Q. And who was that?
2 A. I --
3 Q. We can put it -- you can make that
4 confidential, as well. We won't disclose it.
5 A. I -- I --
6 Q. You don't want to disclose it?
7 A. Well, it's not that.
8 Q. You don't remember?
9 A. I mean, do you want -- do you really want me to
10 just name people or someone? Is it -- I mean, I'll --
11 give me a second and I'll think about it. I mean --
12 MR. BEARD: Let's have an agreement that
13 these names will be kept confidential.
14 MR. LEMOINE: That's right.
15 MR. BEARD: Okay. Agreed.
16 A.
17 I -- I can't seem to recall --
18 Q. (BY MR. LEMOINE) How old was ?
19 A. Twenty-seven.
20 Q. And how long ago was it that you--all were
21 having a -- did you--all have a relationship as opposed
22 to just sex one time?
23 A. Say that again, please, I'm sorry.
24 Q. Did you--all have a relationship or did you just
25 have sex one time?

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1 A. No. We -- we developed a relationship.
 2 Q. And that relationship continued parallel to you
 3 being engaged with Ms. Specht?
 4 A. Yes, sir.
 5 Q. And you didn't disclose the existence of that
 6 relationship to Ms. Specht while it was --
 7 A. No, sir.
 8 Q. -- going on?
 9 How old were the XXXX twins when you
 10 invited them up for the liaison?
 11 A. Twenty, twenty-one.
 12 Q. How old would you have been?
 13 A. That would have been 40 -- I would have been, I
 14 don't know, 50, 51, I don't know.
 15 Q. Any other women -- well, let me back up.
 16 As far as you're concerned, the interaction
 17 with the twins is completely consensual?
 18 A. Yes. There was very little interaction.
 19 Q. All right. So you didn't -- there was -- was
 20 there -- there was no kissing, there was no nothing?
 21 A. No.
 22 Q. It was just a discussion, and then they left?
 23 A. That's correct.
 24 Q. And were you disappointed?
 25 A. I suppose.

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1 Q. Was it fairly common for you to invite women to
 2 your room while you were at conventions?
 3 A. Actually, very uncommon.
 4 Q. So the -- the -- the XXXX -- the twins was kind
 5 of a -- that was a one-off kind of a deal?
 6 A. Yes. And, again, the fact that I had seen them
 7 at four or five events over the years leading up to
 8 this. It wasn't like, you know, I went walking down the
 9 hallway and I point, you, I want you, you know. It --
 10 they were people that -- that I had seen and spoken to
 11 and interacted with multiple times leading up to this
 12 event, which is why I developed the impression that they
 13 were interested in me.
 14 Q. Did you ask them to strip for you in your room?
 15 A. No.
 16 Q. And did Ms. Denbow communicate to you that the
 17 twins thought that the interaction was not consensual?
 18 A. Yes. She told me that -- yes. As I mentioned,
 19 she said, do you recall this, and forcibly kissing them,
 20 and, no, that is not the way it happened.
 21 Q. Have you ever stated to anyone that you, in the
 22 last 10 years, that you hired prostitutes or escorts?
 23 A. I have.
 24 Q. And who would you have said that to?
 25 A. Oh, I don't remember who I said it to. I -- I

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1 thought you were asking me if I ever have.
 2 Q. Well, that would have been a follow-up
 3 question.
 4 A. Sorry.
 5 Q. So the follow-up question is, have you ever
 6 hired prostitutes or escorts?
 7 A. I did once, yes.
 8 Q. And when was that?
 9 A. Probably eight or nine years ago.
 10 Q. Would that have been while you were engaged to
 11 Ms. Specht?
 12 A. That would have been before.
 13 Q. So never during your engagement with her did
 14 you hire --
 15 A. No, sir.
 16 Q. -- any prostitutes?
 17 The behavior that we've gone -- been going
 18 over, is that -- is that consistent with your Christian
 19 faith?
 20 A. No. I have made a lot of mistakes.
 21 Q. Have you ever made any mistakes with girls
 22 under 17 years old?
 23 A. No, sir.
 24 Q. Have you ever invited any girls up to your room
 25 that were under 17?

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1 A. No, sir.
 2 Q. Have you ever invited any girls up to your room
 3 that looked like they might be under 17?
 4 A. No, sir.
 5 Q. Okay. So for purposes of the record, how we
 6 were handling it, I'm going to shift now to the Monica
 7 Rial allegation. So we discussed the first two
 8 allegations, the incidents, the -- what did Ms. Denbow
 9 tell you was the issue with regard to Mrs. Rial?
 10 A. She said, Do you recall being at an event with
 11 Monica, at a convention event, and eating a jelly bean
 12 that she had signed, and saying, now -- now I can --
 13 well, Monica said, Why would you eat that, you know,
 14 you're going to get ink poisoning. And I, off the cuff,
 15 made a joke that, Well, now I can say I -- now I can say
 16 I ate Monica Rial.
 17 Q. And that was the only thing that Ms. Denbow
 18 communicated to you?
 19 A. Yes, sir.
 20 Q. And did you think that was kind of silly?
 21 A. Yes, sir.
 22 Q. And did you tell Mrs. Denbow that you didn't
 23 mean anything by the jelly bean comment?
 24 A. It was a -- yes. It was clearly a joke, and it
 25 happened in public in front of plenty of people. It

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1 was -- it was, dare I say, kind of like a show. You
2 know, I mean, they're fans and they're all laughing and
3 thought it was funny.

4 Q. And you understand that Mrs. Rial has accused
5 you of a far more serious incident than --

6 A. I understand now.

7 Q. But that was not relayed to you by Ms. Denbow?

8 A. No, sir.

9 Q. Did you have any more conversations with --
10 with Ms. Denbow after that initial conversation on
11 January 25th?

12 A. I'm sorry, would you repeat the question,
13 please?

14 Q. Yeah. Did you have any more conversations with
15 Ms. Denbow after January 25th?

16 A. I -- I don't remember if it was her, but at the
17 end of that conversation, the first one, she said that
18 they would be in touch with me. And I don't remember
19 how much time went by, I don't think it was more than a
20 couple of days, and they called me and basic -- and
21 there was -- there was more than one person on the line,
22 and they said, We've reviewed the situation, and you're
23 being terminated from Funimation immediately.

24 Q. And did that come as a shock to you?

25 A. Yes, very much so.

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1 Q. Did they say anything about why, other than the
2 situation?

3 A. No. I -- I was -- I was a bit dumbfounded.

4 Q. And so there was no, We believe them and we
5 don't believe you, nothing like that?

6 A. No.

7 Q. Now, did you -- was it anything other than you
8 were terminated and that's it? When that phone call
9 ended, did you ask them why?

10 A. Bear with me, Sean.

11 Q. Sure.

12 A. It was -- it was rather a blow.

13 Q. Sure.

14 A. And I think I -- I think I said I've worked for
15 you for 20 years. I -- I can't believe, based on what
16 you asked me about, that this is an appropriate action
17 and that -- and I don't -- I don't remember them saying
18 much of anything in response. And they're like, all
19 right, bye. I mean, you know, I was a bit dumbfounded.
20 You know, you feel like you've been hit by a truck.

21 Q. Now, did you talk to anybody at Funimation
22 after this termination, talk to anybody about it?

23 A. Let me think. No.

24 Q. And so as far as you know, the -- the basis for
25 the termination was the three incidences that they

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1 raised?

2 A. That's all I was told about.

3 Q. Now, you would agree with me that Ms. Denbow
4 did tell you not to reach out to any of the individuals
5 and to talk to them, correct?

6 A. Yes.

7 Q. And -- and did you reach out to any of them
8 after -- after the fact?

9 A. Yes. I was terminated, why -- why in the
10 world -- why wouldn't I? Especially a woman that I'd
11 been -- thought I was friends with for 20 years. And,
12 in fact, all I reached out to do was to apologize and
13 ask her what it was that -- that -- that I -- that I
14 did.

15 MR. LEMOINE: I object as nonresponsive
16 after yes.

17 Q. (BY MR. LEMOINE) Did you reach out to the --
18 to the -- the twins?

19 A. Nope.

20 Q. Did you reach out to Ms. XXXXXXXXX?

21 A. No.

22 MR. LEMOINE: Let's make sure we strike --
23 we take care of that.

24 Q. (BY MR. LEMOINE) Okay. And you sent an email
25 to Mrs. Rial, correct?

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1 A. Yes.

2 Q. Did she ever respond?

3 A. No.

4 Q. Did you text or try and call her?

5 A. No.

6 Q. When was the first time you would say that you
7 understood that Mrs. Rial was raising the issue of some
8 kind of, what she considered to be assault in your -- in
9 your hotel room, in your hotel room? When did you
10 first --

11 A. You mean the assertion --

12 Q. Right.

13 A. -- from 11 years ago?

14 Q. Yes.

15 A. The first time I -- well, if -- I mean, I'm
16 sure you have all reviewed the -- the tweets and stuff.
17 The first week or -- or two, Monica made
18 several very vague references online. I have a story.
19 It happened to me. And people would ask, and she -- she
20 wasn't really very specific for a week or -- or two. I
21 can't remember. And it was during that period that I
22 emailed her and said, I -- I've considered you a dear
23 friend for 20 years, I'm so sorry if I ever did anything
24 to offend you. Please tell me what it was. I didn't
25 hear back from her. And then a short time after that

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1 was when she actually published, publicly, her account.
2 Q. And what is your understanding of what her --
3 her recollection of that event in your hotel room was?
4 A. I'm sorry?
5 Q. No, I don't want to do that. I'll do that
6 later.
7 Now, did you talk to this termination with
8 Ms. Hansell after it occurred?
9 A. Sure.
10 Q. And did she have any advice for you?
11 A. Not that I recall.
12 Q. Do you know if Ms. Hansell has any relationship
13 with the -- the Kiwi Farms --
14 A. No.
15 Q. -- that we looked at in Exhibit 10?
16 A. No, not to my knowledge at all.
17 Q. And do you know if Ms. Hansell has a YouTube
18 channel?
19 A. No.
20 Q. You don't know?
21 A. I don't think she does, but I don't know for
22 sure.
23 Q. And, certainly, if she did, you wouldn't know
24 about her commenting about this litigation --
25 A. No, absolutely not.

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1 Q. -- on that YouTube channel?
2 We've talked about Rooster Teeth, we've
3 talked about Funimation. Have you ever been
4 investigated for your behavior at any other company or
5 business that you ever worked for?
6 A. Not to my knowledge.
7 (Exhibit 1 through 9 marked.)
8 Q. (BY MR. LEMOINE) All right. I'm going to hand
9 you a binder that I've pretabbed with Exhibits 1 through
10 9.
11 A. Okay.
12 Q. Right now Exhibits 1 through 8 are in there.
13 I'll give you 9 when we get -- when we get through it.
14 A. Okay.
15 Q. And I'm giving your attorney Exhibits 1 through
16 8, as well.
17 You talked earlier in the deposition about
18 kind of this firestorm that kicked off about the same
19 time that Dragon Ball came out. Do you remember that?
20 A. Yes, sir.
21 Q. Turn to Exhibit 1. I'll represent to you that
22 Exhibit 1 is a tweet that I pulled off of the internet
23 from a person that uses the Twitter handle
24 @actuallyamelia. Do you recognize this tweet?
25 A. I'm sorry, say that again, please. I was

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1 reading it, I'm sorry.
2 Q. All I'm saying, I'm going to represent to you I
3 pulled this off of the internet and it's a tweet, I
4 understand, that may have kicked off this firestorm
5 about you. Are you with me so far?
6 A. Okay.
7 Q. Looking at Exhibit 1, is this the tweet, or do
8 you know?
9 A. I don't know.
10 Q. Do you recall looking at the tweet back in
11 January of 2019? Did you know it came --
12 A. The only tweet that I remember was one that
13 said, Sorry to bring this up on the day the Broly movie
14 is -- is being premiered, but I think it's time that
15 Funimation stop casting Vic Mignogna for his sex -- for
16 his misconduct, I think was the word they used.
17 And shortly after that, they started the
18 hashtag and, like I said, it just kind of picked up
19 steam.
20 Q. All right. And was the tweet on somebody's
21 Twitter that you were following, or is that something --
22 A. No. No, sir.
23 Q. -- somebody told you?
24 A. Just somebody. There are lots of people out
25 there.

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1 Q. All right. And so after that, did -- did you
2 agree that it kind of became -- it went viral?
3 A. I suppose, yeah.
4 Q. Do you know why it went viral?
5 A. (Witness nods.)
6 Q. I mean, is there something about anything that
7 you've done over the past 20 years in the voice acting
8 community that would lend credence to people thinking
9 that maybe you were a sexual assaulter?
10 A. No. There are an awful lot of fans out there
11 who are really desperate for attention, and they often
12 like to talk about people to get it.
13 Q. And so your theory is that they make up stories
14 about you sexually assaulting them to get attention?
15 A. Absolutely.
16 Q. Wouldn't it be better to say 'I had sex with
17 Vic' to get attention, as opposed to say 'Vic assaulted
18 me'?
19 A. Oh, I'm sure, give it time, or if you haven't
20 seen it, I'm sure somebody out there would say that.
21 Q. But -- and that may or may not be true, right,
22 you've -- you have had sex with --
23 A. Consensually, yes.
24 Q. In fact, you've had sex with so many people
25 consensually, you're not sure what the number is. And

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

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

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

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

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1 because as this has been happening in the events that
2 I've attended since then, it -- I have never hugged
3 anyone or asked them to hug me, but if a fan, who is
4 clearly an adult, says, can I give you a hug, I will
5 look at my handler, who is right here, arm's length
6 away, witnessing everything, and say, Did you hear that
7 she requested a hug? And I will usually do kind of a
8 one little, one hand thing.

9 Q. And -- and do you restrict that to adults?
10 A. Yes.
11 Q. Meaning you don't hug children anymore?
12 A. No.
13 Q. And you don't kiss on children anymore?
14 A. No.
15 Q. Do you agree with me that's kind of creepy,
16 right?
17 A. No.
18 Q. Not creepy?
19 A. Not when they ask you.
20 Q. I mean, is there an age limit in which a child
21 can ask you to kiss and hug on them and you say that's
22 creepy?
23 A. You see, when you say kiss, it sounds like
24 something sexual, but somebody who is kissing a child on
25 the forehead or the cheek as a -- as a symbol of

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1 kindness or appreciation, is not meant in any sexual
2 way.
3 Q. Besides yourself, do you know any 50-year-old
4 men that kiss children on the cheek or forehead that
5 aren't their children?
6 A. I'm sure there are many.
7 Q. I'm just asking if you know one.
8 A. No. I never thought to need to keep a record
9 of that. I don't.
10 Q. All right. Turn to page 4. Second full
11 paragraph, last sentence. It starts, Organizers at
12 conventions. Are you with me?
13 A. I'm sorry. Yes, sir, go ahead.
14 Q. Organizers at conventions, meanwhile, she heard
15 stories of unprofessional behavior such as oversetting
16 his panel time and yelling at staffers.
17 Any truth to that?
18 A. Occasionally.
19 Q. And when you say occasionally, that happened
20 every convention, every other convention?
21 A. No. Occasionally, not every time.
22 Q. It's not -- not a pattern of --
23 A. Absolutely not.
24 Q. Okay.
25 A. I don't think I would be invited to 40 events,

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1 30 or 40, or however many events that I've been invited
2 to over the years, if -- if I -- if that was a regular
3 pattern. There are exceptions to that when you -- when
4 you interact with people or you discuss expectations
5 leading up to an event, and the expectations are not met
6 and it causes problems, it can be frustrating. I have
7 also apologized to conventions and organizers for
8 getting frustrated.

9 Q. What is Discord?
10 A. I don't know.
11 Q. You never heard of Discord?
12 A. I -- I think it's an online thing.
13 Q. Is it not -- is it like some kind of app or
14 something?
15 A. I don't know.
16 Q. All right. Look at the third paragraph on page
17 4.
18 A. Uh-huh. Wait. Page -- okay. Go ahead.
19 Q. The second sentence in the third paragraph
20 says, Leaked screenshots revealed that Mignogna took to
21 Discord for his private fan -- fan club, the Risebowl
22 Rangers, last Saturday to encourage his fans to counter
23 the accusations. The #istandwithvic rose in response.
24 So my first question is, do you recall
25 getting on some kind of online chat with your private

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1 fan club?
2 A. I did a group -- I did a group chat, yes.
3 Q. And that was prior to releasing your tweet, a
4 tweet about the allegations? Are you following me?
5 A. Which tweet?
6 Q. Fair point. So -- and see if I got the
7 timeline right, you tell me. My understanding is there
8 was a tweet on January 16th, 2019 when Dragon Ball:
9 Broly was released?
10 A. Yes, sir.
11 Q. That's the tweet that kind of erupted about
12 you, correct?
13 A. I assume so.
14 Q. All right. You issued a tweet on January 20th,
15 2019, basically apologizing for offending anybody, and
16 defending yourself?
17 A. Yes, sir.
18 Q. Does that sound right?
19 A. Well, apologizing.
20 Q. Okay.
21 A. I don't remember defending myself for anything.
22 I apologized for any unintended offense.
23 Q. Right. And then -- but prior to issuing that
24 tweet, you went -- went online somehow with your online
25 fan club to talk to them about what was going on?

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1 A. Uh-huh.
2 Q. And -- and one of the things that you were
3 trying to do was rally the troops to defend you online.
4 Do you agree with that?
5 A. No, sir.
6 Q. Well, why not, what's wrong with that? Why
7 shouldn't you get on the --
8 A. No, what I did was -- if I may be clear, what I
9 did was I encouraged them to speak of their positive
10 experiences. Because there were people online throwing
11 a bunch of negative experiences around, and I felt
12 pretty confident there were a lot more positive -- a lot
13 more positive experiences than there were negative ones,
14 and I encouraged people that had positive experiences to
15 speak up and be heard.
16 Q. Right. You went and rallied your troops?
17 A. I encouraged --
18 MR. BEARD: Objection, form.
19 A. -- them to speak positively. I don't have
20 troops any more than the people against me rally people
21 against me.
22 Q. (BY MR. LEMOINE) How many -- how many people
23 are in your fan club that you spoke --
24 A. I -- I don't know the exact number. I -- I --
25 I don't know the exact number, actually.

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1 Q. Would you agree with me that after you had this
2 chat, private chat with your fan club, that the
3 #standwithvic arose?
4 A. I have no idea when that started or who started
5 it.
6 Q. I'm going to show you what I've premarked as
7 Exhibit 26.
8 (Exhibit 26 marked.)
9 A. I actually was troubled when that hashtag was
10 started because I just wanted it to die down, and I felt
11 like that was just going to exacerbate it, but that
12 wasn't really anything I had any control over.
13 Q. (BY MR. LEMOINE) Okay. I'll make a
14 representation to you about Exhibit 26, that this is
15 pulled off of the Risebbool Rangers fan club page.
16 A. Uh-huh.
17 Q. Are you familiar with it? And what the first
18 screen is, I've done some blowups --
19 A. Okay.
20 Q. -- so we can see some of the language that you
21 used.
22 A. Uh-huh.
23 Q. And then pages 2 and 3 are the actual
24 screenshots just so somebody could check my homework.
25 Are you with me so far?

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1 A. Okay.
2 Q. All right. So February 19, 2019, before you
3 issue a public tweet, you are tweeting -- you're
4 communicating in your fan club group, right?
5 A. Yes, sir.
6 Q. And that group consists of people that like
7 anime?
8 A. Sure.
9 Q. And a lot of women, young women in that group?
10 A. All different ages and genders.
11 Q. Okay. And one of the things that you wanted to
12 make sure that they did was to do just whatever they
13 could do to counter any negative communications out
14 there about you, right?
15 A. Just to speak -- speak their own positive
16 experiences.
17 Q. And not just speak their own positive
18 experiences, you wanted them to do whatever they could
19 do?
20 A. No, sir.
21 Q. Go online, start a petition?
22 A. No, sir.
23 Q. Dox people?
24 A. No, sir.
25 Q. None of that? You didn't want that?

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1 A. No, sir.
2 Q. Why do this?
3 A. Why do what?
4 Q. Why -- why go online and have your fan base try
5 and rally the troops?
6 MR. BEARD: Objection, form.
7 Q. (BY MR. LEMOINE) How about this, I'll just use
8 your language: Why go online and say do whatever you
9 can do to counter all these lies and negativity? Why --
10 why did you do that?
11 A. Because my reputation and work was under
12 attack.
13 Q. Okay. Now, after January 19, 2019, the attacks
14 on you were what, or what did you understand them to be?
15 What -- what did you understand the attacks on your
16 reputation and your work, what did you think they were
17 -- they were?
18 A. I'm -- I'm sorry, I don't understand.
19 Q. I haven't done a good job.
20 A. What did I -- I don't --
21 Q. Was it that you were homophobic, that you were
22 racist, that you were a predator? What was it that you
23 were trying to get your fan base to counter?
24 A. The negativity, in general.
25 Q. All right. Any of your fans text or email or

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1 back-channel you in some way telling you what they were
2 doing to counter these lies and negativity?
3 A. I don't recall that any of that happened.
4 Q. Have you ever used this tactic in the past
5 where you encourage your fan base to go and counter
6 people that were speaking negatively about you?
7 A. Not that I recall.
8 Q. Okay. So this is kind of a first-time event,
9 right?
10 A. This -- yeah, this is a unique event.
11 Q. We're --
12 MR. LEMOINE: Let's go off the record.
13 THE VIDEOGRAPHER: And we're going off the
14 record at 2:21.
15 (Break taken from 2:21 p.m. to 2:34 p.m.)
16 THE VIDEOGRAPHER: And we are back on the
17 record for the beginning of disc number 4. The time is
18 2:34.
19 Q. (BY MR. LEMOINE) Mr. Mignogna, if you would
20 turn to Exhibit 3 in the binder.
21 A. Yes, sir.
22 Q. I'll represent to you that it's a printout from
23 the Facebook page of a woman named Jessie Pridemore.
24 A. Uh-huh.
25 Q. Are you familiar with Ms. Pridemore?

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1 A. I've heard her name.
2 Q. Are you aware that Ms. Pridemore made some
3 allegations?
4 A. Yes.
5 Q. What is your understanding of what those
6 allegations were?
7 A. I think she claims that I propositioned her at
8 an event in -- I don't even know, eight, nine years ago.
9 Q. All right. Did you ever tell anyone that Mrs.
10 Pridemore was a con slut?
11 A. No.
12 Q. Do you know what a con --
13 A. I don't know her.
14 Q. Do you know what a con slut is?
15 A. Well, I can only assume, you know, based on the
16 word itself.
17 Q. You've -- you've heard the word before,
18 correct?
19 A. Well, I -- I know what -- I understand what the
20 term slut means, and con, assumably, would be somebody
21 at a con, convention.
22 Q. Right. But have you ever heard that word
23 before, or are you just breaking it down because this is
24 the first time you've heard it?
25 A. No, I have not, actually.

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1 Q. Never heard it before?
2 A. No, sir.
3 Q. Okay. And so if Ms. Pridemore says that you
4 slid your hands up in her hair and tugged her head back
5 and said something to you [sic], you don't remember
6 anything like that?
7 A. No.
8 Q. And don't know who Ms. Pridemore is?
9 A. No. I mean, I -- again, I know the name. And
10 I think when you asked me about her before, I think I --
11 I said that I -- I -- I understand that she does -- she
12 shows up at a lot of events, but I don't know her
13 personally.
14 Q. Do you have a penchant for pulling the hair of
15 female guests at conventions?
16 A. No.
17 Q. You don't put your hand up -- slide your hand
18 up there and pull their hair, pull their neck back?
19 A. No.
20 Q. No idea where people might get that idea?
21 A. Well, there's a difference between doing
22 something on a regular basis, and no idea where somebody
23 would get that.
24 Q. Have you ever done that, have you ever, at a
25 convention, in front of people, reached your hand up

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

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1 Q. Did you read it when it came out?
2 A. I don't know if I did in its entirety, no.
3 Q. Do you know the author, Lynzee Loveridge?
4 A. No.
5 Q. Are there things contained in Exhibit 4 that
6 you consider to be defamatory?
7 A. Yes.
8 Q. You would agree with me that the statements
9 made in the Anime News Network article about you have
10 damaged your reputation?
11 A. Yes.
12 Q. Do you see anything that any of the Defendants
13 in this lawsuit have done with the publication of this
14 article?
15 A. I don't know. They could have. I don't have
16 any knowledge either way.
17 Q. If you would look on page 1 of Exhibit 4, third
18 full paragraph.
19 A. Uh-huh.
20 Q. About the middle of the page it says, The
21 thread quickly spread with over 4,000 retweets at the
22 time of this writing and over 400 comments, many
23 relaying their own negative experiences, including
24 unwanted and unsolicited physical interaction from the
25 Full Alchemist voice actor. Did I read that correctly?

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1 A. Yes, sir.
2 Q. And you are the Full Alchemist voice actor?
3 A. I suppose so.
4 Q. And you agree with me this article is written
5 about you?
6 A. Yes, sir.
7 Q. Okay. Do you disagree with that, that -- or,
8 sorry, strike that.
9 Do you agree with me that that particular
10 thread accusing you of things on January 16th spread
11 like wildfire?
12 A. I assume so.
13 Q. Do you attribute anything that any of the
14 Defendants did, to it spreading like wildfire?
15 A. I can't answer that. Possibly. I don't know.
16 Q. Would you agree with me that kissing
17 14-year-old girls on the face, whether it's consensual
18 or not, is really not appropriate for a 40- or
19 50-year-old man?
20 MR. BEARD: Objection, form.
21 A. I would say a lot depends on context.
22 Q. (BY MR. LEMOINE) Okay. When is it -- what is
23 the context in which a 40- or 50-year-old man kissing a
24 14-year-old girl is appropriate?
25 A. Well, if it is requested, if the -- if the --

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1 in the past, this is the way I felt about it. I
2 apologized for this, by the way. I apologized for not
3 really considering, you know, that while there may be
4 500 people who appreciate that kind of kindness, there
5 may be a few that don't.
6 When they -- when they're visibly emotional
7 or upset, and you're wanting to be comforting and kind
8 to them, all of these things happened in full public
9 view of many people standing around, shooting videos,
10 taking pictures. It wasn't sexual in any way, it wasn't
11 private or sadistic or weird in any way. It was -- it
12 was literally meant as an act of kindness.
13 Q. Right. So if you would turn to page 3 of
14 Exhibit 4. Page 3, look at the bottom.
15 A. Two. This must be three.
16 Q. Three.
17 A. Uh-huh.
18 Q. So top photo, that's a picture of you --
19 A. Uh-huh.
20 Q. -- kissing a --
21 A. Uh-huh.
22 Q. -- woman, perhaps girl, in 2014. That would
23 have been fairly regular for you to kiss women on the
24 side of the face like that?
25 A. No, actually, it wasn't regular at all.

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1 Q. That was irregular?
2 A. Yes.
3 Q. Do you even -- you don't remember this photo,
4 do you?
5 A. No.
6 Q. Okay. So how do you know it's irregular?
7 A. Because I know how often I do it, and it
8 doesn't happen very often.
9 Q. And when you say very often, you're talking
10 about it happens less than 50 times at convention?
11 A. I don't count, sir, I'm sorry.
12 Q. So then how do you know it's not often if you
13 don't count?
14 A. Because if it happened often, I would know that
15 it was pretty often.
16 Q. You would agree with me that it was happening
17 often enough that people were commenting on it and --
18 online for years, weren't they?
19 A. Yes.
20 Q. Okay.
21 A. I agree that people were commenting on it,
22 certainly.
23 Q. And even though people commented on it in a
24 negative light, you continued to do it, right?
25 A. Yes.

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

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

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

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

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

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

3 know --

4 Q. Well, you --

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

6 Q. What would a lot be?

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

8 recollection is that I started losing more events after

9 Funimation and Rooster Teeth terminated me, and after

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

11 publicly.

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

13 lose, if you know?

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

15 offhand.

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

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

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

19 A. I don't know.

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

21 familiar with an online blog called The Dao of Dragon

22 Ball?

23 A. No, sir.

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

25 Ball fans or not?

166

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

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

3 wrote an article about you?

4 A. I'm sorry?

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

6 wrote an article about you?

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

8 --

9 Q. Okay. So --

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

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

12 ever read this Exhibit 5?

13 A. Not that I recall.

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

15 A. No, sir.

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

17 A. No, sir.

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

19 blame any of the Defendants for any of the information

20 in it?

21 A. No, sir.

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

23 article was defamatory?

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

25 that it is.

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1 Shall we read it and find out?

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

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

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

5 date.

6 A. Okay.

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

8 to page 3 of Exhibit 5.

9 A. Okay.

10 Q. All right. First full paragraph, second

11 sentence reads, However, numerous allegations of sexual

12 assault have shadowed Mignogna's career and continue up

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

14 100 independent allegations surfaced dating back to

15 2013.

16 Do you agree with that statement?

17 A. No, sir.

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

19 allegations of assault that have shadowed --

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

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

22 names.

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

24 names or 10?

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

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1 said 100; it sounds much more impressive.

2 MR. LEMOINE: Objection, nonresponsive.

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

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

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

6 difference?

7 A. Yes, it does.

8 Q. And why does it make a difference?

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

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

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

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

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

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

15 behavior against them?

16 A. Yes.

17 Q. Like who?

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

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

20 A. No, sir.

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

22 Me Too Movement?

23 A. Yes, sir.

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

25 assault victims ought to be heard?

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1 A. Yes.

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

3 way, right?

4 A. No, sir.

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

6 be female?

7 A. No, sir.

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

9 first full paragraph, starts with another --

10 A. Yes, sir.

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

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

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

14 interacting with young girls on a website without

15 parental supervision and who then embraces and kisses

16 these children at conventions is going to raise

17 eyebrows, even if innocuous.

18 Do you agree with that statement?

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

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

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

22 conventions --

23 A. No, sir.

24 Q. -- is going to raise eyebrows?

25 A. Sorry?

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1 Q. What's inflammatory about the statement?

2 A. If I may.

3 Q. Sure.

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

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

6 without parental supervisor." The person who wrote this

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

8 inflame.

9 Hold on. Let me please finish. "Embraces

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

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

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

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

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

15 contingent that does, and I apologized to those people

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

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

18 of interaction.

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

20 have had that type of interaction --

21 A. No.

22 Q. -- or that reaction to this?

23 A. No.

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

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

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1 damaged your reputation?

2 A. Please rephrase.

3 Q. Yeah. The fact that people have reacted

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

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

6 here today?

7 A. To a degree.

8 Q. All right. Look at page 9. Under the word

9 allegations, are you familiar with a site called Vic

10 Mignogna Horror Stories?

11 A. No, sir.

12 Q. First time you've ever heard of it, today?

13 A. Yes, sir.

14 Q. Didn't know that it ran for six years?

15 A. No, sir.

16 Q. Are you familiar with a Twitter #kickvic?

17 A. I certainly know of it, yes.

18 Q. Do you know when it started?

19 A. If memory serves, it started very shortly after

20 January 16th, when the -- when the first tweets were put

21 up, were posted.

22 Q. And do you blame any of the Defendants for that

23 Twitter handle starting?

24 A. I don't know their involvement.

25 Q. Would you agree with me that Twitter handle has

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1 gotten some level of notoriety in -- in your -- your

2 community?

3 A. Sure.

4 Q. And would you agree with me that's also hurt

5 your reputation?

6 A. Sure.

7 Q. Do you know who -- who created the

8 #istandwithvic Twitter?

9 A. No, I don't, actually.

10 Q. Turn to page 17. Top paragraph reads, Even

11 without definitive proof following the recent

12 allegations in January, several conventions announced

13 that Vic Mignogna would no longer attend their

14 convention. For example, on January 28th, 2019, Planet

15 Comicon in Kansas City announced that Vic had canceled

16 his scheduled appearance.

17 Is that true?

18 A. Is what -- which part of it?

19 Q. Good question.

20 A. No, that's fine.

21 Q. My apologies. Did Planet Comicon cancel your

22 -- announce that you were -- wait a minute.

23 Did you cancel your appearance to Planet

24 Comicon?

25 A. No, sir.

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1 Q. Did Planet Comicon cancel your appearance?
2 A. Yes, sir.
3 Q. Did they tell you why?
4 A. No, sir.
5 Q. Have you ever spoken to any --
6 A. Well, I assume because of -- of what was going
7 on, but I don't know.
8 Q. But nobody that runs Planet Comicon has told
9 you why you weren't invited?
10 A. No, sir.
11 Q. If you look at the bottom of page 17, last --
12 last full paragraph, Likewise, the Rangerstop & Pop
13 Atlanta convention announced on January 18th that Vic
14 would attend a convention, that the fans sent them the
15 allegations and requested #kickvic. The staff replied
16 they had not heard these allegations before and
17 investigates them. Then on January 28th, the staff
18 cancels.
19 Is it true that Rangerstop & Pop Atlanta
20 canceled your attendance?
21 A. Yes, sir. That was a -- this was a first-year
22 convention, by the way. This was run by a friend of
23 mine, Nakia Burrise, who -- well, she was one of the
24 organizers of it. And -- and she had invited me, and
25 then she called me to say that they were just kind of

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1 really surprised by all these anonymous messages they
2 were getting, and they really were afraid, you know,
3 being a first-year event. And so, yes, they -- yes.
4 MR. LEMOINE: And do any of you --
5 Q. (BY MR. LEMOINE) Do you know how to spell that
6 -- that lady's name?
7 A. I'm so sorry?
8 Q. Do you know how to spell her name?
9 A. Oh. Nakia, N-A-K-I-A, Burrise, B-U-R-R-I-S-E,
10 I think. She was the yellow ranger in one of the
11 incarnations of Power Rangers.
12 Q. And when you talked to Ms. Burrise, did she say
13 that anything that any of the Defendants said or did was
14 -- was why they were canceling that?
15 A. Not specifically, no.
16 Q. Did she imply that, it was something that one
17 of the Defendants --
18 A. Not specifically, no. She didn't say any
19 names.
20 Q. Okay. So looking on paragraph -- or on page 18
21 -- or, I'm sorry, Exhibit 5, page 18. Are you with me?
22 A. Yes, sir.
23 Q. Second full paragraph. This was followed on
24 January 30th by Emerald City Comicon announcing Vic
25 Mignogna's appearance at Emerald City Comicon has been

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1 canceled.
2 Is that true?
3 A. Yes, sir.
4 Q. And did you talk to anybody at the Emerald City
5 Comicon?
6 A. I did not speak with them. I spoke with one of
7 my friends, my -- an agent of mine who was working with
8 Emerald City.
9 Q. And who was that?
10 A. His name is Gary Hassen.
11 Q. And what did Mr. Hassen tell you?
12 A. Gary -- Gary told me that -- Emerald City is
13 owned by a larger company that puts on several events.
14 I believe the company is called Inform -- no, ReedPOP.
15 There are two big companies that buy a lot of
16 conventions. There's ReedPOP and there's Informa. And
17 Emerald City, I believe, is owned by ReedPOP. And for
18 the same reasons, they -- they told my -- my -- my --
19 they told Gary that -- that they had received anonymous,
20 you know, negative accusations and -- and that they were
21 canceling me.
22 Q. And did -- did Mr. Hassen relay to you that
23 anything the Defendants did caused ReedPOP to cancel the
24 -- that convention?
25 A. Not this specific convention, no, sir.

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1 Q. Are you familiar with the concept of a broken
2 staircase?
3 A. I'm sorry?
4 Q. Have you ever heard of a broken staircase?
5 A. No, sir.
6 Q. Did you know that you were mentioned on a
7 website called Broken Staircase?
8 A. No, sir. What -- what is it?
9 Q. Turn to page 23 of Exhibit 5. If you look
10 under Broken Staircase. Apparently, you're the third
11 entry on the list for sexual misconduct with minors,
12 physical boundary violations, verbal and physical sexual
13 harassment, homophobia and anti-Semitism.
14 I take it you didn't know that?
15 A. No, I've heard that there was a list, and it's
16 preposterous.
17 Q. And, obviously, you disagree with that?
18 A. Absolutely.
19 Q. But you would agree with me that being on that
20 kind of list is damaging to your reputation?
21 A. Sure.
22 Q. Do you attribute anything to what the
23 Defendants have done for you being on that list?
24 A. I don't know. I don't know what any -- I don't
25 know what any actions that -- that I'm unaware of might

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1 be.

2 Q. Do you recall the date that you were terminated

3 by Funimation?

4 A. Well, can I consult one of your exhibits?

5 Q. Sure.

6 A. Whichever -- okay. So the conversation with

7 Tammi --

8 Q. January 25.

9 A. So I would guess it was on or about January 27,

10 28, I think, roughly.

11 Q. And that's when they called you and said --

12 A. Yes, sir.

13 Q. Okay.

14 A. Yes, sir.

15 Q. Are you familiar with Kara Edwards?

16 A. Yes, sir.

17 Q. And she is a voice actor in Dragon Ball Super?

18 A. Yes, sir.

19 Q. I forget. Adam Sheehan used to work at

20 Funimation?

21 A. Yes, sir.

22 Q. Have you ever had any negative run-ins with Mr.

23 Sheehan?

24 A. No, sir.

25 Q. Would it surprise you to learn that Mr. Sheehan

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1 considered sexual assault allegations against you to be

2 an open secret in the voice acting industry?

3 A. Yes, it would surprise me. All of my

4 interactions with Mr. Sheehan were always very positive

5 and friendly.

6 As we established early on in this

7 deposition, I apparently am not very good at -- at

8 assessing friends.

9 Q. If you turn to Exhibit 6. I will represent to

10 you that it's a screenshot from Rooster Teeth's Twitter

11 account.

12 MR. BEARD: Exhibit 6?

13 Q. (BY MR. LEMOINE) Are you familiar -- are you

14 familiar with this tweet?

15 MR. BEARD: Hold on, Counsel.

16 A. I --

17 MR. BEARD: Exhibit 6?

18 THE WITNESS: It's this one.

19 MR. BEARD: All right. Got it. Well, you

20 got the colored ones. We only got the black and whites.

21 Q. (BY MR. LEMOINE) I'll represent to you that

22 this was sent out on February 5th, 19 -- I think you

23 were told you were terminated by Rooster Teeth on

24 February 4th of 2019. Does that sound right?

25 A. I believe you. I didn't see this, but I was

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1 told about it.

2 Q. Okay.

3 A. I was in a pretty difficult state at this

4 point.

5 Q. Anything on Exhibit 6 that you consider to be

6 defamatory about you, obviously?

7 A. Sorry, I'm not the super fast reader.

8 Q. It's all right.

9 A. No, sir.

10 Q. Would you agree with me that even if it's not

11 defamatory, it -- being terminated by Rooster Teeth in a

12 public way, hurt your reputation?

13 A. Sure.

14 Q. Would you associate that termination with you

15 losing invitations to any cons?

16 A. Possibly.

17 Q. Anybody ever tell you that, that because

18 Rooster Teeth terminated you, we're not going to invite

19 you to this con?

20 A. There were certainly conventions that told me

21 that because I was terminated by Funimation and Rooster

22 Teeth, so in the same sentence they included Rooster

23 Teeth.

24 Q. As you sit here today, do you think that

25 Rooster Teeth has defamed you in any way?

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1 A. Not verbally, not publicly.

2 Q. Do you think privately they've defamed you in

3 some way, that you're aware of?

4 A. Possibly. I -- I'm not aware of anything

5 specific. But as you asked me earlier in the day, you

6 know, terminating me without even so much as a

7 conversation or any kind of an understanding of -- of --

8 of it was -- was pretty difficult.

9 Q. If you turn to Exhibit 7. Are you familiar

10 with the Funimation tweet terminating you?

11 A. Yes, sir.

12 Q. Have you seen it before?

13 A. Yes, sir.

14 Q. And is this a true and correct copy of that

15 termination?

16 A. Well, this is one of them.

17 Q. There was more than one?

18 A. Yes, sir.

19 THE WITNESS: Am I correct?

20 A. I'm sorry. May I consult my counsel? Is that

21 okay? I'm just --

22 Q. (BY MR. LEMOINE) I'll represent to you -- I'm

23 not trying to trick you.

24 A. Sorry.

25 Q. I'll represent to you that I took this from

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1 Funimation's page and cut it -- did a screenshot of it,
2 and those are the --
3 MR. BEARD: I think if you look here --
4 THE WITNESS: Oh, there it -- I'm so sorry,
5 it's below. That's the second tweet. The -- I was just
6 looking at the first one. So underneath it is another
7 one, and then a third one, right?
8 Q. (BY MR. LEMOINE) Right. Okay. So -- so let
9 me break it down into components.
10 The first thing is, do you consider the top
11 part of Exhibit 7 the big tweet, on February 11th, 2019,
12 that says, everyone, we want to give you an update on
13 the Vic Mignogna situation. Following an investigation,
14 Funimation's recast Vic Mignogna in Morose Mononokean
15 Season 2. Funimation will not be gauge -- engaging
16 Mignogna in future productions.
17 Do you consider that to be defamatory?
18 A. No, sir, that's not the big tweet. The big
19 tweets are the follows.
20 Q. The -- the two smaller ones?
21 A. Right.
22 Q. And when I say big tweet, I'm just saying it's
23 physically bigger.
24 A. Yeah, I was going to say -- okay.
25 Q. Right.

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1 A. Big as in important.
2 Q. Right. So --
3 A. Sorry.
4 Q. Right. So it's the two tweets below what we
5 call the second and third tweets, that you would
6 consider to be defamatory, correct?
7 A. Yes, sir.
8 Q. And the reason you consider them to be
9 infamatory is -- defamatory is what?
10 A. Because they clearly imply that -- that I am
11 guilty of harassment, threatening behavior. There's
12 no -- there's no proof or evidence of -- evidence of
13 that. And if I'm -- if I -- if I'm not mistaken,
14 Funimation, on the phone, told me that they were not
15 going to be releasing any public statement. When they
16 terminated me -- I should say Sony. In the
17 conversation, they called me and terminated me, they
18 said they would not be releasing any public statement.
19 And shortly after, I can't remember, a week, two weeks
20 after, maybe a week, they started -- they released these
21 tweets publicly.
22 Q. Were there any other tweets other than these
23 tweets?
24 A. Not that I'm aware of.
25 Q. Looking at the second and third tweets, is

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1 there anything that you think is untrue about those
2 statements?
3 A. Well, as I -- as I said, it's a matter of
4 implication.
5 Q. Okay. But on its face, there's nothing that --
6 that you would point and say, that statement that Sony
7 doesn't condone harassment of any kind is -- is not --
8 it's untrue?
9 A. I'm sorry, please say that again.
10 Q. Right. As you sit here today, do you think
11 Funimation or Sony condones harassment?
12 A. Of course not.
13 Q. If you turn to Exhibit 8. Are you familiar
14 with a magazine called --
15 A. Oh, that's awesome, what a great picture.
16 Q. Are you familiar with a --
17 A. No, sir.
18 Q. All right. Let me get my question out.
19 A. Oh, I thought you just asked, and were
20 repeating it, I apologize.
21 Q. Are you familiar with a magazine -- online
22 magazine called Gizmodo?
23 A. No, sir.
24 Q. Have you ever seen or read the article from
25 Gizmodo, written on February 19th, 2019, titled one of

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1 biggest -- One of Anime's Biggest Voices Accused of
2 Sexual Harassment?
3 A. No, sir.
4 Q. Never seen it before today?
5 A. No, sir. I was told it was -- it existed. I
6 have not read it myself.
7 Q. So you haven't -- you -- I could go through
8 this, but you can't comment one way or another in terms
9 of as we -- strike that.
10 Right now, do you know whether or not this
11 article is defamatory about you or not?
12 A. I could lay really good odds.
13 Q. Okay. Do you know if -- turn to page 2.
14 Do you know Beth Elderkin?
15 A. No. I mean, I know the name, but I don't know
16 her personally.
17 Q. Did Ms. Elderkin reach out to you to comment on
18 this particular article?
19 A. Yes, she did.
20 Q. And did you comment?
21 A. I did.
22 Q. And did she -- how did that -- was it online --
23 strike that.
24 Did you email each other, or was it a phone
25 conversation?

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1 A. She emailed me, and I replied.
2 Q. And so did she -- in the email, did she list
3 out the allegations against you --
4 A. Yes.
5 Q. -- and actual responses?
6 A. Yes. And I replied to them, and she picked and
7 chose my replies to put into the article, and omitted
8 portions of what I -- of my replies.
9 Q. Did -- do you still have the copy of that
10 email?
11 A. I -- I'm sure I -- again, it's -- it's -- I'm
12 sure it's in an -- an old email folder.
13 Q. Do you know if you gave it -- provided it to
14 your attorneys at some point?
15 THE WITNESS: Did I -- had I even retained
16 you at that point?
17 Q. (BY MR. LEMOINE) It's February 19th.
18 MR. BEARD: If we have it, we'll --we'll
19 produce it. I think I might.
20 A. Are you asking, sir -- are you asking about my
21 reply or are you asking about her email to me requesting
22 a comment?
23 Q. (BY MR. LEMOINE) So I didn't know that -- how
24 you communicated with her.
25 A. She wrote me unsolicited, said I'm writing an

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1 article for io9 and I'd like to ask if you would comment
2 on these issues. And I commented on them, bullet point
3 --
4 Q. Right.
5 A. -- and sent it back to her.
6 Q. And was it a pretty lengthy email that she sent
7 to you?
8 A. Yes, sir.
9 Q. Okay. And so you went through each of them and
10 --
11 A. Yes, sir.
12 MR. BEARD: Counsel, if I might, the -- I
13 think all that has -- has been released out on Twitter,
14 both the emails she sent to Vic and Vic's response.
15 MR. LEMOINE: Okay.
16 MR. BEARD: I think, yeah.
17 MR. LEMOINE: And I'm not -- I'm not
18 implying that you didn't produce it, I just didn't --
19 hadn't seen them.
20 MR. BEARD: Yeah. No, I'm just trying to
21 -- I'm trying to rack my brain to know if I did. It was
22 -- if it was, it was real early when this stuff was
23 going on. I don't think so.
24 Q. (BY MR. LEMOINE) Regardless, you -- it was --
25 there was no oral conversation with Ms. Elderkin?

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1 A. No, sir.
2 Q. Okay. So -- so we could go look and we'd get
3 the email and see exactly how you responded to whatever
4 she wrote.
5 All right. If you turn to page 6. Top
6 paragraph reads, When reached by io9 to comment,
7 Mignogna said that he had never forced himself on
8 anyone, claiming that any and all encounters I have ever
9 had have been 100 percent consensual. He gave specific
10 responses to the accusations present in this article,
11 denying some and providing his own version of events on
12 others. Did I read that correctly?
13 A. Yes, sir.
14 Q. And you haven't read the articles, you don't --
15 MR. BEARD: Counsel, sorry, I got -- I got
16 lost. Where -- where is that?
17 MR. LEMOINE: Page -- page 6.
18 MR. BEARD: Page 6. Okay.
19 MR. LEMOINE: Very top.
20 MR. BEARD: Yeah, okay, sorry, got it.
21 Q. (BY MR. LEMOINE) But you haven't gone through
22 this article to figure out whether or not she accurately
23 portrayed your commentary, your -- your responses?
24 A. I was told that -- who -- by people who knew
25 what I had responded to her and then read the article,

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1 that -- that they -- that she did not print my complete
2 responses.
3 Q. Right. Did anyone help you craft your
4 responses?
5 A. Yes.
6 Q. Was it an attorney?
7 A. No.
8 Q. Who was it?
9 A. It was a man-and-wife couple named Jessica and
10 Cliff, Jessica and Cliff -- I don't know their last
11 names. They're PR, you know, kind of -- just kind of
12 help people, and somebody -- actually, it was -- I don't
13 even -- I -- I think Todd Haberkorn --
14 MR. BEARD: I'll get you that -- those
15 names.
16 A. -- referred them to me.
17 Q. (BY MR. LEMOINE) Let me ask a few follow-up
18 questions and see if I jog your memory a little bit.
19 Have you ever used Jessica and Cliff's
20 services before?
21 A. No.
22 Q. Todd Haberkorn is the person who introduced
23 you?
24 A. Yes. Well, I -- may I -- may I --
25 Q. Sure.

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1 A. -- revise that? What I mean is I understood
2 that they had helped him craft a statement. I was --
3 didn't know what to do or how to respond to everything
4 that was happening and -- and I -- so I reached out to
5 them to see if they could help me, as well. Todd did
6 not call me and say, This is their name and number.

7 Q. Now, did you know Jessica and Cliff outside of
8 that?

9 A. No, sir.

10 Q. That's the first time you had ever met them?

11 A. Yes, sir.

12 Q. And so that would have been sometime in 2019?

13 A. Yes, sir.

14 Q. And do you know, were they -- are they local to
15 Dallas?

16 A. No, sir, I believe they're in Florida.

17 MR. BEARD: Florida.

18 Q. (BY MR. LEMOINE) And did you pay them?

19 A. Yes, sir.

20 Q. And did you meet them in person to discuss the
21 issues?

22 A. No, sir.

23 Q. Talk to them on -- talk to them on the phone?

24 A. Yes, sir.

25 Q. And would you have emailed with them?

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1 A. I probably did.

2 Q. Were there multiple drafts of your response
3 that you--all went over?

4 A. Yes, probably.

5 Q. And do you know -- and would you have emailed
6 those back and forth?

7 A. Between them and me?

8 Q. Yes.

9 A. Yes, sir.

10 Q. And do you know, were those -- did you save
11 those drafts on your computer somewhere?

12 A. No, no more than you save a rough draft of
13 something, you save the final draft, you know, and you
14 work on something and --

15 Q. But you would have edited the draft, sent it to
16 them; they would have edited and sent it back?

17 A. Actually, no. More than -- more times than not
18 they would write something, and then I would -- they
19 would send it to me, and then I would make adjustments
20 to it that I felt were appropriate.

21 And if I may say, there were things that
22 they actually suggested that I never posted, I never --
23 like I never ever released. Like we talked about
24 something, and then I just didn't feel good about
25 releasing it at all.

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1 Q. Meaning there was personal information that you
2 didn't want to discuss?

3 A. No, no, no. No, meaning that they wrote up
4 something that I didn't want to release, that I -- I
5 didn't want to -- I didn't want to get out. Not
6 personal information, just didn't want to exacerbate the
7 situation, you know.

8 Q. If you look at exhibit -- stay on -- still on
9 Exhibit 8, page 7.

10 A. Yes, sir.

11 Q. There's a reference to a woman named Rachel?

12 A. Yes, sir.

13 Q. Do you recall -- do you know who that Rachel
14 is?

15 A. No, sir.

16 Q. All right. If you look at the -- on page 7,
17 the second full paragraph, it says, Mignogna
18 acknowledges events that happened, including that he had
19 rubbed the back of Rachel's thighs, but said the
20 encounter was consensual.

21 You sure you don't remember who that is?
22 Because, obviously, her name is not Rachel.

23 A. If I -- may I have a minute to read this?

24 Q. Sure.

25 A. Where is the -- where does Rachel start here?

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1 Q. Page 6, last paragraph.

2 A. Yes, I believe that's Kara Edwards, and I think
3 that I replied in my reply to -- you know, in -- in the
4 email that I sent to -- to Beth Elderkin, I -- I
5 believe. I believe. But in my reply, I -- I stated
6 very clearly that many of the details of this were
7 untrue.

8 Q. All right. If you would turn to Exhibit 8,
9 page 9.

10 A. It's so funny to me.

11 Q. What -- what -- what's funny?

12 A. I'm reading this. So she has this horrific
13 experience, and then a second situation, she agreed to
14 come by my room briefly. Now, why would she do that?

15 I'm sorry. I -- I -- I didn't even -- like
16 I said, this is -- some of this is still kind of fresh.

17 Q. If you look at the bottom of page 7.

18 A. Yes, sir.

19 Q. Last paragraph. It says, Rachel says she did
20 not report the incident to hotel management or to police
21 because she feared Mignogna would attempt to negatively
22 impact her career. He's very well-known in the
23 industry, very, very powerful in our industry, she said.

24 Would you agree with the statement that
25 you're very, very powerful?

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1 A. No, sir.

2 Q. And why do you disagree with that?

3 A. Because it's not true. Voice actors are a dime

4 a dozen, and --

5 Q. So you're --

6 A. I have no power or influence. I audition for

7 roles for 20 years just like everyone else. I get some,

8 I -- I don't get many others.

9 Q. Turn to Exhibit 8, page 9. Third full

10 paragraph.

11 A. Yes, sir.

12 Q. This is in 2014, a professional cosplayer,

13 Diana. That's not her real name.

14 Do you know who it is?

15 A. I'm fairly certain it was someone at an event

16 in Hawaii. I'm fairly certain it was at an event, but

17 I'm not -- I'm not sure, again. But I believe it was at

18 an event.

19 Q. And when the -- when Ms. Elderkin was provided

20 the information, did she use the actual names?

21 A. No, she did not.

22 Q. She used -- okay. So pseudonyms of some sort?

23 A. Yes, sir. And, of course, when I replied, I --

24 I used the names of the people I believed these -- they

25 were. Of course, she didn't publish that, but --

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1 Q. Are you aware of anyone being harassed online

2 that has come out against you in this -- during this

3 controversy?

4 A. No. Not personally, no. I do know that people

5 that have defended have been viciously harassed. I do

6 know that.

7 Q. All right. If you turn to page 15.

8 A. Sorry?

9 Q. Page 15.

10 A. Fifteen?

11 Q. Yep.

12 A. Yes, sir.

13 Q. Top paragraph, four sentences down, it starts,

14 but an email shared with io9 also showed Mignogna --

15 MR. BEARD: Wait one second.

16 A. Hold on, I'm sorry. I couldn't quite make out

17 what you --

18 MR. BEARD: Okay. I don't see 15 now.

19 MR. LEMOINE: Exhibit 8.

20 MR. BEARD: Oh, Exhibit 8, page 15. My

21 bad. All right.

22 Q. (BY MR. LEMOINE) Are you with me?

23 A. Yes, sir.

24 Q. All right.

25 MR. BEARD: Oh, yeah, sorry. Yeah, sorry.

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1 Q. (BY MR. LEMOINE) First full paragraph, fourth

2 sentence down, says, But an email shared with io9 also

3 showed Mignogna three days later privately telling a fan

4 how a certain voice actor turned to be hateful toward

5 me. Mignogna mentioned that person by name.

6 Do you know who that is?

7 A. No. Three days later from what? I'm -- I'm

8 trying to get a context here.

9 Q. Looks like it would be February 11th, based on

10 context.

11 A. Harassment included -- oh, this is -- okay. So

12 the context here is people being harassed, correct?

13 Q. Yes.

14 A. Or -- or somehow being messed with because --

15 right?

16 Q. Yes.

17 A. No, I -- I -- I don't know -- showed Mignogna

18 three days later privately telling a fan how a certain

19 voice actor had turned to be hateful toward me.

20 Well, I -- I -- that's -- I don't remember

21 that, but I don't -- that certainly has happened. But I

22 have never encouraged anyone to -- to do any -- anything

23 hateful or negative, attacking, certainly not death

24 threats.

25 Q. And anybody associated with you, do you know if

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1 they've encouraged that type of behavior?

2 A. No, sir. I've heard -- I've heard people tell

3 that they've received death threats, and I've also heard

4 that every time they're -- they're put on the spot to

5 produce said death threats, they never do. I don't know

6 if that's true or not so I -- I -- I've heard the buzz,

7 but I don't really have any personal knowledge.

8 Q. Right. If you turn to page 17. That block

9 quote appears to me to be a quote from Ms. Specht, your

10 former fiancée?

11 A. Yes, sir.

12 Q. First paragraph, last sentence. It says, I've

13 had to face the reality that the loving, monogamous

14 relationship I believed in and was devoted to never

15 existed.

16 Do you agree with Ms. Specht's hindsight

17 review of your relationship?

18 A. No. It certainly did exist at some point, but

19 I -- I failed Michele miserably, and I deeply regret

20 that.

21 MR. BEARD: While you're looking,

22 two-minute break?

23 MR. LEMOINE: Sure.

24 THE VIDEOGRAPHER: And we're going off the

25 record at 3:27.

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1 (Break taken from 3:27 p.m. to 3:37 p.m.)
2 THE VIDEOGRAPHER: And we're back on the
3 record for the beginning of disc number 5. The time is
4 3:37.
5 Q. (BY MR. LEMOINE) Mr. Mignogna, I'm going to
6 show you what I've premarked as Exhibit 9. And you can
7 put that in the binder or keep it in front of you, it's
8 up to you.
9 A. My name has an additional G in it, but --
10 Q. Oh, I'm sorry.
11 A. -- people have missed it for a long, long time,
12 so it doesn't matter at all.
13 Q. My -- my apologies.
14 A. No, no worries. I just wanted to let you know.
15 Q. So I put together the timeline just to kind of
16 show start to finish -- or not start to finish, but
17 start -- you would agree with me that this firestorm
18 kind of kicks off on January 16, 2019, right?
19 A. Yes, sir.
20 Q. And then by January 19, 2019 is when the
21 GoFundMe announcement occurs?
22 A. I'm sorry?
23 Q. I'm sorry, February 19th --
24 A. Oh.
25 Q. -- is when the GoFundMe occurs?

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1 A. If you say so. I don't remember dates, like,
2 specifically, but, yes.
3 Q. Okay. And then along the way, you are losing
4 convention invites, would you agree with that?
5 A. Yes, sir.
6 Q. Was there any other business besides
7 invitations to cons that you lost, that you can point
8 to?
9 A. Well, I mean, the -- there were at least seven
10 or eight recurring roles at Funimation that I had been
11 playing for many, many years, I lost those, and any
12 future recording sessions of those shows. I lost the
13 recurring character that I was playing for Rooster
14 Teeth. And I'm sure there are, you know, other
15 repercussions, you know, ripples that I might even never
16 know about.
17 Q. And the Rooster Teeth termination, we don't
18 know why that occurred, we just know it occurred,
19 correct?
20 A. Yes, sir.
21 Q. And then the Funimation termination, we don't
22 know why that occurred either?
23 A. Well, we can only assume, based on the -- the
24 three stories that -- the three incidents that Tammi --
25 Tammi?

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1 Q. Yes, Tammi Denbow.
2 A. Yes, sir. That Tammi asked about.
3 Q. Are you familiar with --
4 MR. BEARD: Excuse me, Counsel.
5 MR. LEMOINE: Sure.
6 Q. (BY MR. LEMOINE) Are you -- are you --
7 A. Yes, sir. Go ahead.
8 Q. Are you familiar with something called rumor
9 panels?
10 A. No. In what context, sir?
11 Q. In the context of panel discussions at cons
12 that are, I guess, called rumor panels.
13 A. No, sir. I did a panel many, many years ago at
14 a convention about rumors about me, because I wanted to
15 dispel them. They were baseless and without substance,
16 and I -- and I knew that people had questions and I
17 wanted to address them.
18 Q. Is that the only rumor panel that you've ever
19 done?
20 A. Yes, sir.
21 Q. Do you know what con that was at?
22 A. No, not offhand. It was a long time ago.
23 Q. And -- and what was the purpose of the -- the
24 rumor panel?
25 A. As I said, I -- I knew that there were rumors

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1 and gossip online, and I knew that fans had questions
2 about it, and I wanted to dispel the rumors.
3 Q. All right. I'll show you what we're going to
4 mark as Exhibit 21.
5 (Exhibit 21 marked.)
6 Q. (BY MR. LEMOINE) I'll represent to you
7 Exhibit 21 is a post on the internet I pulled off, or
8 somebody pulled off, with a date of 4/20/2010,
9 references a Tekkoshococon rumor panel.
10 A. Which is in Pittsburgh. Tekkoshococon is in
11 Pittsburgh.
12 Q. All right. Does that one refresh your
13 recollection, that that's what the rumor panel that you
14 did was at the Tekkoshococon in Pittsburgh?
15 A. Yes, sir. I suppose, yes. I only did one, and
16 I didn't remember the panel -- the convention, and this
17 says Tekkoshococon, in which I know is a Pittsburgh
18 convention, so I can -- I'm going to assume that's --
19 that's the one.
20 Q. All right. Are you aware of any other voice
21 actors that have done rumor panels?
22 A. I don't know. There are hundreds of voice
23 actors do hundreds of panels at hundreds of conventions.
24 I don't know what their schedules are. I don't know
25 what they do.

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1 Q. Okay. So you've never heard of anybody doing a
2 rumor panel besides you?
3 A. I've never asked. I mean, I -- I've never
4 inquired. I don't know.
5 Q. And so the rumor panel is designed for you to
6 talk about rumors and address them; is that right?
7 A. Yes, sir.
8 Q. Okay.
9 A. Well, actually, if I may say so, it wasn't
10 designed to be that type of panel. It was a normal Q
11 and A session, and I ended up -- I think maybe somebody
12 even might have asked a question about something and I
13 answered it, and it kind of continued in a vein of,
14 you've heard this, or, you've heard this, and it became
15 that, but it wasn't, like, advertised that way.
16 Q. Do you recall that this rumor panel in
17 Tekkoshocoon addressed any issue of you being homophobic?
18 A. Yes, sir. It's outrageous.
19 Q. And that was -- and is that a rumor that has
20 kind of dogged you even after that rumor panel?
21 A. Yes, sir.
22 Q. And does -- that you're homophobic, does that
23 hurt your professional reputation?
24 A. Well, it certainly doesn't help it.
25 Q. And if you turn to page 2 --

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1 A. And for the record, I am not remotely
2 homophobic.
3 Q. Okay. Turn to page 2 of Exhibit 21. Third
4 sentence down on the top paragraph, if you slide over,
5 it reads, Vic also reveals that he encouraged Britt and
6 her friends to attack cosfu and 4chan about these
7 stories and that he set up a PayPal account which
8 demanded video proof of Vic being drunk in exchange for
9 \$100. Does that ring a bell?
10 A. Yes, sir. I didn't occur -- I'm going to
11 clarify, though. You see, this is somebody's words, not
12 mine. I didn't encourage someone to attack anybody.
13 I will tell you what happened, if -- if I
14 may, Sean.
15 Q. Sure.
16 A. There were all these rumors, I saw Vic falling
17 down drunk, I'm stumbling around a convention. Well,
18 there are dozens of cameras rolling at all times. I've
19 never been stumbling drunk in my life, ever, on the
20 planet Earth. And these rumors made up by fans just
21 looking to get attention were more and more frustrating.
22 And so I told one of my friends, why don't we set up a
23 PayPal and anyone who can provide video evidence of me
24 stumbling around drunk at a convention, I'll give them a
25 hundred bucks.

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1 Q. Okay.
2 A. Suffice to say, nobody ever claimed it, because
3 it never happened.
4 Q. And during this rumor panel, did you encourage
5 people to go on sites and tell everybody that they were
6 wrong about you?
7 A. I encouraged people that were my friends and
8 supporters to be supportive.
9 Q. And have you had -- between the Tekkoshocoon
10 panel and the January 19th discussion you had with the
11 Risembool Rangers, have you ever done that in between,
12 in the last nine years?
13 A. Not that I recall. Actually, I kind of got
14 used to it after a while. You know, the first time it
15 happened, I tried to -- I tried to address it, and then
16 I just kind of came to terms with the fact that there
17 are people out there who are going to say what they want
18 to say from the anonymity and -- and -- you know, and
19 safety of their laptops at home and I can't do anything
20 about it, so I just stopped addressing it.
21 Q. And what are the -- what would you say are the
22 rumors that have kind of persisted?
23 A. Well, this is one of the biggest ones, that I'm
24 homophobic, although there's not one ounce of evidence,
25 no -- I -- I would challenge anyone to provide any

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1 public comment or attitude or anything that ever proves
2 that I have been rude or cruel or hateful or mean or
3 made -- ever made a homophobic remark.
4 I have several friends that are gay. There
5 are many friends of mine that worked on my Star Trek
6 production who are gay. I attended a transsexual
7 friend's wedding.
8 Q. Let me show you what we're going to mark as
9 Exhibit 14.
10 (Exhibit 14 marked.)
11 Q. (BY MR. LEMOINE) Do you recognize Exhibit 14
12 as the tweet you sent out on January 20th, 2019?
13 A. Yes, sir. This was the first -- the first
14 response that I made four days after the -- I mean,
15 based on the date, four days after the -- the social
16 media thing began.
17 Q. And -- and this is the tweet that you put out
18 after -- the day after you had the discussion on the
19 Risembool Rangers website encouraging people to go out
20 and talk about you in a positive light?
21 A. I -- I -- I don't remember the dates. Again,
22 this was -- I was in quite a distressed place at this
23 point, and I don't remember when. I wasn't going to
24 respond. As I said just a minute ago, I had kind of
25 gotten to the point where, you know what, don't -- don't

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1 encourage it, don't respond. And so for the first
2 several days, I didn't respond, and -- and then this was
3 the first public response.

4 Q. Now, you've kind of apologized in that letter
5 to people you've made feel uncomfortable.

6 Was there anybody in particular that you
7 were thinking or was that just more of a generic?

8 A. No, it was generic. It -- it was the idea of
9 somebody that I might have hugged for a photo that
10 didn't say anything at the time, but, of course they
11 went home and posted about how they didn't approve --
12 appreciate it or something, and I apologized to those
13 people for not being sensitive to that.

14 Q. Now, were there allegations floating around
15 after January 16, 2019 that you were a pedophile?

16 A. Well, people have been throwing that word
17 around for, you know --

18 Q. For -- for what?

19 A. Well, just for a while.

20 Q. About you?

21 A. Yes.

22 Q. For how long?

23 A. I don't know.

24 Q. I mean, when's the first time you can recall --

25 A. I don't recall. Like I said, there are people

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1 A. Not that I can think of.

2 Q. And at the time you wrote this, you had -- it's
3 your testimony that you had no idea that Mrs. Rial had
4 accused you of inviting her to your room -- or to your
5 room and forcing yourself on her?

6 A. I never forced myself on her.

7 Q. Did you do anything? Did you kiss, make out
8 with, or have any type of sexual interaction with Ms.
9 Rial at any point in time?

10 A. If -- if -- if I understand correctly, this --
11 this is from 11 years ago and I -- I don't -- I don't
12 have any specific recollection. But what I can tell you
13 is that I have had hundreds of interactions with Monica
14 over the years since, and no indication whatsoever that
15 I ever did anything that upset or offended her.

16 Q. Has she ever been in your hotel room in the
17 last eight years?

18 A. Sir, we've done dozens of conventions together,
19 we have been friends and I -- I don't know any specific
20 times, but I wouldn't be surprised if -- if that were
21 the case.

22 MR. LEMOINE: I'm going to object as
23 nonresponsive.

24 A. I wouldn't be surprised if she were, because
25 we've done many, many, many events together.

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1 out there that see me hugging someone for a photo in
2 front of 300 other people and 25 video cameras, it's
3 purely for the photo, and they -- and they decide
4 somehow that I'm a pedophile. There is no evidence of
5 that. There's no proof of it. There are no charges.
6 There are no convictions. It's just salacious.

7 Q. Have any of the Defendants, to your knowledge,
8 ever accused you of being a pedophile?

9 A. Not to my knowledge.

10 (Exhibit 15 marked.)

11 Q. (BY MR. LEMOINE) Let me show you what I've
12 marked as Exhibit 15.

13 A. Uh-huh.

14 Q. The second email, Exhibit 15, that is the
15 apology that you wrote, or the -- not the apology, but
16 the letter you wrote to Monica Rial on February 8th,
17 2019?

18 A. Yes, sir.

19 Q. And you -- did you have any -- anybody help you
20 draft this?

21 A. I bounced it off a couple of friends of mine
22 before I sent it.

23 Q. Who did you bounce it off of?

24 A. My friend Jeff Johnson.

25 Q. Anybody else?

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1 Q. (BY MR. LEMOINE) As you sit here today, since
2 -- in the last eight years, can you identify any time
3 that you recall Mrs. Rial being alone with you in your
4 hotel room?

5 A. Is she married now, Mrs. Rial?

6 MR. LEMOINE: Object as nonresponsive.

7 A. I'm just saying, I believe it's Ms. Rial.

8 No, I don't recall any specific events,
9 specific times.

10 Q. (BY MR. LEMOINE) And -- and you don't actually
11 have a specific recollection of her ever being in your
12 room?

13 A. Not specifically, no.

14 Q. So the point in time in which you wrote this
15 email on February 8, 2019, you were really struggling to
16 figure out why she was upset with you?

17 A. Yes, sir.

18 Q. And she hadn't gone public with that in any
19 way?

20 A. Oh, she had alluded to it publicly, but she had
21 not given any specifics, which is why I said I really
22 want to know what -- what it was that -- you know. I
23 embarrass -- I am embarrassed to say that I honestly
24 don't know. I hope you will share it with me so that I
25 may sincerely apologize.

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1 Apparently, she wasn't interested in any
2 apology, because the beginning of this she writes
3 another member -- another actress at Funimation and
4 says, This is what he always does, it's disgusting.
5 I guess she wasn't interested in any kind
6 of sincere interaction.
7 MR. LEMOINE: Object as nonresponsive.
8 Move to strike. There's no question on the table.
9 (Exhibit 20 marked.)
10 Q. (BY MR. LEMOINE) I'll show you what I've
11 premarked as Exhibit 20. I'll represent to you that
12 what Exhibit 20 is, it's a -- what's called written
13 discovery, and it's an interrogatory where each side
14 gets to ask the other side certain questions. And these
15 are questions that your attorneys asked --
16 A. Okay.
17 Q. -- of Ms. Rial. And what I want to do is go
18 through one of her -- some of her answers and get your
19 comments. So I want to start on page 5 of Exhibit 20.
20 A. Yes, sir.
21 Q. Interrogatory number four. Are you with me?
22 A. Yes, sir.
23 Q. Okay. Interrogatory number four has a request
24 about, at some point in time which you grabbed or kissed
25 Mrs. Rial in a hotel room in the mid 2000s.

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1 As we sit here right now before reading the
2 response, do you have any recollection of any type of
3 interaction in your hotel room with Ms. Rial where you
4 kissed her?
5 A. No, sir.
6 Q. Okay. All right. So if you look at the first
7 bullet point, it says, Plaintiff grabbed and kissed
8 Defendant without Defendant's consent on Sunday,
9 November 4, 2017, while --
10 A. 2007.
11 Q. I'm sorry, 2007 -- while Plaintiff and
12 Defendant were both attending Izumicon, Oklahoma City,
13 Oklahoma.
14 Any recollection of that?
15 A. No, sir. That was 12 years ago.
16 Q. If you turn to page 6. The first bullet point
17 at the top of page 6 says, Plaintiff played videos
18 promised, while Defendant stood to watch video. The
19 Plaintiff soon grabbed the Defendant by the upper arms
20 and began aggressively kissing Defendant. Defendant
21 attempted to resist, but Plaintiff physically restrained
22 Defendant, pushed Defendant back towards -- backward
23 toward the bed. Plaintiff climbed on top of Defendant
24 and held her down as he continued to aggressively kiss
25 Defendant.

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1 Did that happen?
2 A. No, sir.
3 Q. And you're sure that didn't happen?
4 A. Yes, sir.
5 Q. Second bullet point on page 6, Plaintiff
6 continued in this fashion for several minutes,
7 despite Defendant's --
8 A. Several minutes.
9 MR. LEMOINE: Object, nonresponsive.
10 A. What was Ms. Rial doing at this time?
11 Q. (BY MR. LEMOINE) Let me get the question out.
12 A. Sorry, I apologize. I apologize. This is the
13 first I read this. I'm sorry. I apologize.
14 Q. Let me start over at the bullet point.
15 Plaintiff continued in this fashion for several minutes,
16 despite Defendant's fear and shock, until Ms. Dahlin
17 knock -- Mr. Dahlin knocked on the Plaintiff's hotel
18 door. Plaintiff left Defendant on the bed and hurriedly
19 answered the door. Mr. Dahlin inquired whether the
20 Defendant was okay, clearly noticing the stress.
21 Defendant, however, was too shocked and afraid to admit
22 what had occurred.
23 You dispute that, right?
24 A. I don't recall that at all.
25 Q. Okay. The third bullet point. Following

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1 dinner, Plaintiff forced Defendant to speak with
2 Plaintiff's long-time fiancée on the telephone and
3 Plaintiff spoke with his fiancée as if nothing happened.
4 Do you recall that?
5 A. No, sir.
6 Q. And your fiancée at the time would have been
7 Ms. Specht?
8 A. Michele Specht.
9 Q. Now, prior to today, have you seen that
10 description from Ms. Rial in -- in any --
11 A. I'm sorry, say that again, sir.
12 Q. Prior to today, have you seen or heard that
13 description from Ms. Rial online or anywhere?
14 A. I -- I know of the story that she posted online
15 back when she originally posted it. But I -- I -- there
16 are more details here than there were in her original
17 story. Like, I don't believe -- on the online story,
18 she didn't say anything about when or where, she didn't
19 say anything about Stan Dahlin, she didn't say anything
20 about putting her on the phone. By the way, I -- well,
21 I -- I just don't even understand a lot of it, so --
22 Q. Have you ever grabbed Mrs. Rial's hair -- Ms.
23 Rial's hair and pulled it back and whispered in her ears
24 before?
25 A. Whispered what?

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1 Q. I don't know.
2 A. Neither do I.
3 Q. I'm not asking for what you whispered, I'm
4 asking if you --
5 A. Well, you asked if I did. I don't recall
6 whispering anything.
7 Q. And do you recall grabbing her by the back of
8 her hair and pulling her hair?
9 A. I -- well, I -- I -- I recall doing that, not
10 in a violent or hurtful way, but in a playful way.
11 Ms. Rial used to be a hairdresser. She's
12 always kind of changing her hairstyles over the years
13 and coloring cool colors and -- and I -- and I always
14 used to comment on how much I loved her hair or her new
15 hairstyle.
16 It's really disingenuous to use the term
17 pulling hair, too, because it sounds -- it just has a
18 connotation of being somehow violent, and it -- it was
19 never that.
20 Q. But you did put your hands on her and pull her
21 hair?
22 A. Yes, sir.
23 Q. And you've done that more than once?
24 A. No. I -- I did not pull her hair. And, again,
25 we were friends, it was all in casual interaction, and I

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1 was never -- if she had ever told me don't -- please
2 don't do that again, I wouldn't have ever done it again.
3 Q. And is that something you've done with other
4 women in the past, where you pull their hair just
5 playfully as part of just who you are?
6 MR. BEARD: Objection, form.
7 A. I would -- I would definitely say it has
8 probably happened before in -- in playful interaction
9 with people, but not very often.
10 Q. (BY MR. LEMOINE) Let me show you what we're
11 going to mark as Exhibit 16.
12 (Exhibit 16 marked.)
13 Q. (BY MR. LEMOINE) Is Exhibit 16 a true and
14 correct copy of a tweet that you sent out on
15 February 13th, 2019?
16 A. Yes, sir.
17 Q. If you look at the third paragraph, it talks
18 about your colleagues and that there was animosity that
19 you didn't know existed.
20 Who are you referencing there? Who are
21 your colleagues?
22 A. I am -- I am referencing any of the voice
23 actors who not only posted, but those who liked or
24 supported the people that did, people that, for the last
25 15 years of my work at Funimation, have seen me in the

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1 hallways and even worked with me in productions and been
2 nothing but friendly and kind and jovial, and I never
3 had any idea that there was any animosity.
4 Q. Anybody you can specifically identify?
5 A. Well, I'm sure you can find them by who -- who
6 posted, who liked the tweets.
7 Q. But nobody, as we sit here today, off the top
8 of your head?
9 A. Well, I'm certain I was referring to Monica,
10 probably Jamie, and I know that Chris Sabat, Sean
11 Schemmel, and a few other voice actors liked and
12 commented on -- on some of this, and I was quite
13 dumbfounded when I -- when I found out. I'm like, oh,
14 my goodness, like, I worked -- I cast this guy in my
15 show and he was all friendly and -- you know, and jovial
16 and best buddies, and now he's online joining in on
17 this. It was surprising, to say the least.
18 Q. It was just a total shock to you because people
19 were coming out that had known you for all these years,
20 and --
21 A. Yes, sir.
22 Q. And you just don't know why they would do that?
23 A. Yes, sir.
24 Q. Did you seek the help of a counselor at any
25 time on --

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1 MR. BEARD: Objection, privileged.
2 Don't answer.
3 MR. LEMOINE: Why is it privileged? I'm
4 not asking about what a counselor talked about.
5 MR. BEARD: That's true. That's -- fair
6 enough. Fair enough.
7 You can answer yes or no, that's true.
8 Q. (BY MR. LEMOINE) Have you sought the help of a
9 counselor prior to February 13th, but with regard to
10 this whole issue?
11 A. I don't remember the dates, specifically, but I
12 was in a great deal of distress and needed to talk to
13 somebody and I -- I started spending -- I started seeing
14 a counselor.
15 Q. So February 13th, kind of the last paragraph,
16 you talk about you don't want to be hateful to anybody
17 else.
18 Why did you -- why did you make that
19 statement? Were you aware of something that was going
20 on?
21 A. Well, because I -- I knew that there was a lot
22 of -- what's the word?
23 Q. Vitriol?
24 A. Friction. You know what I mean? There was a
25 lot of -- of growing friction. It was just building.

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1 And I -- I didn't -- I didn't want any of that. I
2 didn't ask -- I did not ask for any of this. I didn't
3 start any of it. I was living my life, and suddenly out
4 of no where this stuff starts. I merely responded to
5 it.

6 **Q. And have you posted that type of statement**
7 **anywhere else since then?**

8 A. I have said that statement several times in
9 events that I've attended since this, publicly, and
10 there -- I'm -- I'm quite certain there are many videos
11 online of me encouraging people to be kind and positive
12 and -- and, you know, be known for -- for being a
13 purveyor of good as opposed to negativity.

14 **Q. What is it that Jamie Marchi has done to defame**
15 **you?**

16 A. Wow. Well, apart from mischaracterizing a very
17 casual, brief interaction in public and the lobby at
18 Funimation, she publicly posted that and then went on to
19 say that she wanted my head on a stake and wanted my
20 balls in a sling and has -- has posted many, many
21 extremely vitriolic comments.

22 **Q. And how is that defamatory?**

23 A. Because she's a voice actress in my industry,
24 and people will tend to give her more credence because
25 they think, oh, well, she knows him. She -- you know,

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1 said hello.

2 She and I have had, as far as I've known, a
3 very casual, friendly relationship for many, many years,
4 and I was astounded by her account online.

5 **Q. And the account online is that you pulled her**
6 **hair?**

7 A. And that I pulled her hair and that I -- that I
8 whispered something sexual in her ear, which absolutely
9 is not true. I do not, have not, ever had any sexual
10 interest in Jamie.

11 **Q. Ms. Marchi certainly wouldn't be the first**
12 **woman whose hair you've pulled?**

13 A. No. We've established that. But I would take
14 issue with the word pulling hair. That sounds like
15 something you do in a fight with somebody, and that is
16 not the intent ever. Nor do I believe they took it that
17 way at the time.

18 **Q. Are there any conventions that you can point**
19 **to, as you sit here today, that you had an actual**
20 **contract with that were terminated as a result of this**
21 **firestorm?**

22 A. Yes.

23 **Q. All right. Which ones are they?**

24 A. Phoenix Comicon. I'm fairly certain I had a
25 contract with a couple of Informa shows. And my

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1 she must -- her -- her -- her words must carry more
2 weight than some -- some fan, you know, some
3 miscellaneous fan out there.

4 **Q. So what was it exactly that she**
5 **mischaracterized or took out of context?**

6 A. She mischaracterize -- my memory of -- of the
7 event with Jamie was that I had come in to record one
8 day at Funimation, and I was in the lobby and she was
9 there, and she had just changed her hair somehow. She
10 had -- she was wearing it differently or she had cut it
11 somehow. Probably as far away as I am from Casey, and
12 she said, Hey, Hon. And I'm like, oh, my gosh, I love
13 your hair. And she's like, I know, I just got it -- and
14 I walked around the -- the -- the counter, and I was
15 kind of standing there kind of flipping it and like, oh,
16 my gosh, it's really beautiful, I love it. And I -- and
17 I put my hand up in the bottom of it and I'm like, oh,
18 this is great.

19 It was not painful, it was not hurtful, it
20 was not sexual, and it happened at least four or five
21 years ago, maybe longer.

22 And if I may say, I saw Jamie in the lobby
23 at Funimation in January of this year, literally a week
24 to 10 days before this social media thing started, and
25 she's like, Hey, Hon, and went over and hugged her and

220

1 understanding is that Informa told my agent that -- that
2 one of their sponsors put pressure on them to cancel me.
3 I do not know for a fact, but one of their sponsors, a
4 big sponsor, is Funimation. So, you know, it would seem
5 possible to me that Funimation put pressure on Informa
6 to drop me from the shows that I was scheduled for.
7 That would be Megacon, Fan Expo Toronto, Dallas Comicon.
8 I think those are the -- the three that come to mind.

9 **Q. All right. But you don't have -- no one has**
10 **ever told you that it was something that Funimation did**
11 **that caused you to lose those?**

12 A. No one used the word Funimation, no.

13 **Q. All right. Did those --**

14 A. I might look into it a little further, though.

15 **Q. All right. Did any of those -- in this**
16 **conversation, did anyone tell you that it was anything**
17 **that the three individual Defendants said or did that**
18 **caused you to lose those -- those cons?**

19 A. Kameha Con did.

20 **Q. But we've established you got to go to Kameha**
21 **Con, right?**

22 A. Only after a great deal of back and forth. I
23 was originally canceled, even though I had a contract,
24 because of -- of -- of pressure put on by them and
25 threats.

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1 I have also been told, again, I don't know
2 specifics, not yet anyway, that there are other events
3 that the Defendants have contacted and encouraged not to
4 have me, or said they weren't going to come and they
5 were going to try to get their other voice actor friends
6 not to come if I was there.
7 **Q. And who told you that?**
8 A. I don't recall at the time. I don't recall
9 right now.
10 **Q. Do you know what cons that they allegedly --**
11 **the individual --**
12 A. Not as -- not as I sit here today, sir.
13 **Q. Do you have any written evidence, emails, text**
14 **messages, anything?**
15 A. Not yet.
16 **Q. When did you first start doing voice work for**
17 **anime films?**
18 A. If memory serves, maybe 2000. Maybe 2000,
19 2001. I started in Houston with ADV Films and then
20 sometime a few years after that, which is, by the way,
21 where Monica began, that's how I knew her, and then a
22 few years after that, I met people from Funimation who
23 encouraged me to -- asked me if I wanted to play a role
24 in certain things they were doing, and that's how I
25 ended up starting to work at Funimation.

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1 **Q. When would you say your reputation in the voice**
2 **acting community was at its peak?**
3 A. I can't answer that. I don't know. I'm not --
4 it's not for me to say when it's at a peak. I don't
5 know.
6 **Q. Well, you don't kind of intuitively know when**
7 **you're getting invited to more cons and getting asked to**
8 **do more shows?**
9 A. There's an ebb and flow to it all.
10 **Q. When did you first start doing the Broly voice**
11 **for Dragon Ball Z?**
12 A. About 15 years ago.
13 **Q. Is that the most famous character that you've**
14 **done?**
15 A. No, sir.
16 **Q. What's the most famous character?**
17 A. Probably Edward Elric from Fullmetal Alchemist.
18 **Q. When was the last Fullmetal Alchemist?**
19 A. Full -- I'm sorry. Sorry. Fullmetal ended,
20 wow, roughly 10 years ago.
21 **Q. And you've also done the voice characters on**
22 **video games; is that correct?**
23 A. Yes, sir.
24 **Q. What video games?**
25 A. Oh, wow. Soul Calibur, Persona, Sonic, Final

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1 Fantasy, a large number. I kind of just don't even keep
2 track anymore.
3 **Q. When you go to these cons, do you usually do**
4 **panels by yourself or are you with people?**
5 A. Both.
6 **Q. Is it unusual for you to do a panel by**
7 **yourself?**
8 A. No. But it's also not unusual to do them with
9 others.
10 **Q. And what about most recently when you were in**
11 **Ireland, did you do panels by yourself or with others?**
12 A. I paneled -- I did panels by myself. Often,
13 I'll do a -- often, I'll do a panel on a particular
14 show, and if there are other voice actors there that
15 were part of that show, you know, we'll do a Fullmetal
16 panel with me or Kaitlyn and -- and Aaron. Or if there
17 are multiple people that are at the convention who were
18 in that show, or if it's a Dragon Ball panel, you know,
19 we would do a panel if there are multiple voice actors
20 there from Dragon Ball.
21 **Q. How many cons have you done in 2019?**
22 A. Nine, thus far.
23 **Q. Do you typically average between 30 and 40 a**
24 **year?**
25 A. No, I -- I think I average closer to 20 or 30.

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1 I had a pretty large number lined up for this year. I
2 can only assume because of -- of the Broly movie. He's
3 a pretty popular Dragon Ball character, and I've played
4 him in all the anime and video games, Dragon Ball video
5 games for 15 years. So it was kind of exciting when
6 they came out with a new movie that he was the main
7 character of. And it's apparently done very, very well.
8 **Q. Would you agree with me that if you read the**
9 **articles that were being written about you that are**
10 **reflected in Exhibits 1 through 8, and you were at**
11 **convention, on or around convention, that that would**
12 **give you pause to invite you to conventions?**
13 A. Some yes, some no. I've spoken to convention
14 organizers who come down on both sides of it.
15 **Q. So there's some conventions out there that**
16 **aren't concerned at all about the allegations against**
17 **you?**
18 A. There's some.
19 **Q. All right. And then there's others that are?**
20 A. Certainly. And if I may say, I hope this is
21 okay, but if I -- I mean --
22 MR. BEARD: Go ahead.
23 A. A convention organizer may be on the fence,
24 based on rumor and social media, but if a voice actress
25 in the industry or a voice actor in the industry calls

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1 up and -- and puts pressure or -- or a -- an animation
2 company like Funimation or Rooster Teeth calls up and
3 puts pressure on a convention, you know, they can
4 certainly sway the conventions having me.
5 Q. (BY MR. LEMOINE) All right. As you sit here
6 today, you don't know of any instances where Funimation
7 or Rooster Teeth put pressure on a convention not to
8 hire you or allow you to come, do you?
9 A. Not yet.
10 Q. All right. And other than Kameha Con, are you
11 aware of any other conventions that any of the
12 individual Defendants reached out to that chose not to
13 let you come, or cancelled the contract with you?
14 A. You know, Sean, I'm thinking now there was one,
15 and I can't remember the name. Can I have a second?
16 Q. Sure.
17 A. No, I don't yet have any specific information
18 to that effect.
19 Q. Are you familiar with a website called
20 prettyuglyliar.net?
21 A. I've heard of it.
22 Q. Have you ever gone on and looked at it?
23 A. No, sir.
24 Q. Why not? Well, take it -- let me strike that.
25 What have you heard about it?

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1 A. I'm sorry?
2 Q. What have you heard about it?
3 A. I have heard that it's just a repository for
4 garbage.
5 Q. About who?
6 A. Anybody. You. I mean, anybody. No one.
7 Anybody. Anything salacious, anything people desperate
8 to know about other people might want to read.
9 Q. Right. I'm going to show you what we're going
10 to mark as Exhibit 25.
11 (Exhibit 25 marked.)
12 Q. (BY MR. LEMOINE) I'll represent to you that
13 Exhibit 25 represents a Google Docs repository that's
14 associated with prettyuglylittleliar.net. This
15 particular Google Doc was pulled on April 25th, 2019,
16 and it goes through a series of allegations at lengths,
17 associated with people who have made statements about
18 you over the years. But you've never read it, correct?
19 Never been through pretty little -- Ugly Little Liars to
20 see what was being said about you?
21 A. No, sir.
22 Q. When's the first time you can recall
23 allegations of sexual harassment being raised against
24 you in your career as a voice actor?
25 A. Can I ask you to define sexual harassment?

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1 Q. Unwanted touching.
2 A. So that -- so any -- any unwanted contact is
3 harassment?
4 Q. Sexual harassment, yeah.
5 A. Sexual harassment?
6 Q. Sure.
7 A. I -- I don't agree with your definition
8 personally.
9 Q. Well, then give me your definition of sexual
10 harassment.
11 A. Forcing somebody to engage in sexual-related
12 behavior against their will.
13 Q. So you have to use some type of physical force
14 to harass them under your definition, right?
15 A. Or verbal.
16 Q. And when's the first time that you were ever --
17 has there been any allegations made against you for
18 verbal or physical sexual harassment?
19 A. Well, for the longest time, my only
20 recollection of the rumors and stories online were that
21 I would hug fans that -- you know, that didn't want to
22 be hugged or, you know -- or I would get -- I would be
23 too close to -- to a fan that didn't appreciate it. And
24 of course they didn't say anything at the time, but they
25 -- they mentioned it later. Those were the first

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1 instances I ever heard of.
2 Q. And when was that, like, roughly?
3 A. I -- I don't remember.
4 Q. Would you agree with me that this issue of you
5 kissing young girls and that being kind of creepy has
6 been around for a while?
7 A. No, sir.
8 Q. Something that just started?
9 A. No, I wouldn't agree that it was kind of
10 creepy, that part of your sentence.
11 Q. All right. How about we do it this way: Would
12 you agree with me that people online have commented that
13 it's creepy that you kiss young girls?
14 A. Sure.
15 Q. And that's been around for a while?
16 A. Yes, sir.
17 Q. And that's certainly impacted your personal
18 reputation, hasn't it?
19 A. Not much. I mean, I -- I was doing pretty well
20 in the industry, as you pointed out yourself at the
21 beginning of the deposition. I have done hundreds of
22 characters. I've -- I'm just saying I have been a voice
23 actor at Funimation and been hired repeatedly for 15
24 years, and --
25 Q. And it all started on April 16th, 2019, when

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1 that tweet went out?
2 A. April?
3 Q. I'm sorry, January 2016.
4 A. No. No. Like I said, my belief is that --
5 that that date was chosen to piggyback on the popularity
6 of the Broly movie. There has been a recurring theme
7 here. Over the years, any time I am announced as part
8 of a new, big new show or playing a role, there are
9 always a handful of people that want to jump on that
10 publicity and -- and get some attention for themselves.
11 Q. And -- and by get attention to themselves, you
12 mean people post anonymously that you -- you harass
13 people or do inappropriate things?
14 A. Yes.
15 Q. And so they want to get attention for
16 themselves --
17 A. Yes.
18 Q. -- through an anonymous avatar, I guess?
19 A. Yes. For the same reason they don't want to be
20 listed right now, because they want the attention, they
21 want people to click on, ooh, I like your post, and, oh,
22 look how many people liked my post, but they don't --
23 you know, they certainly don't want the accountability.
24 And whenever any supporters have been pressed for any
25 evidence or substance, well, a friend told me that they

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1 magazines or online articles that wrote articles using
2 all of these anonymous names?
3 A. Not yet.
4 Q. You're planning on doing that?
5 A. Possibly.
6 Q. You would agree with me that if you don't sue
7 those magazines, your reputation is still going to be
8 damaged because you'll never --
9 A. Oh, I would say my reputation has been
10 irreparably damaged.
11 Q. And because of those articles, correct?
12 A. No, sir, because of everything. All of it.
13 It's a cumulative thing. Didn't you use -- like the
14 term you used, death by a thousand cuts, you know.
15 (Exhibit 18 marked.)
16 Q. (BY MR. LEMOINE) I'm going to show you what
17 we're going to mark as Exhibit 18.
18 Who is -- Alyssa Fluty does work --
19 A. I mentioned her earlier, and she -- she is one
20 of the moderators for the fan club, for the RiseMbool
21 Rangers.
22 Q. Do you know who drafted this statement?
23 A. No. I've never seen it. I -- I mean, it says
24 at the top, Hello, my name is Alyssa Fluty, so I can
25 only assume that Alyssa drafted it.

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1 heard from a friend, who saw a friend who said that they
2 heard at a convention four years ago, etc., etc.
3 Q. And so the people that have come out and
4 actively accused you of things, you've sued?
5 A. I'm sorry?
6 Q. The people that have come out with evidence and
7 said, this is my testimony and this is what happened,
8 you've sued them?
9 A. What evidence would that be?
10 MR. LEMOINE: Objection, nonresponsive.
11 Q. (BY MR. LEMOINE) Isn't it true that you --
12 well, let me back up.
13 Your complaint is that people don't offer
14 evidence, right? They just say things anonymously,
15 fair?
16 A. Some people.
17 Q. All right. And some people actually come out,
18 use their name and make statements about things that
19 you've done that they think were inappropriate, right?
20 A. Yes.
21 Q. And you've sued at least two of them, two women
22 that allege that you did inappropriate things to them,
23 correct?
24 A. Yes.
25 Q. All right. You haven't sued any of the

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1 Q. But you didn't have any role in drafting?
2 A. No, sir.
3 Q. First time you've seen it is when I handed it
4 to you today?
5 A. Yes, sir.
6 Q. Do you know if there are any other character
7 statements for you?
8 A. I have been told that there has been a website
9 accumulating people's positive accounts of interactions
10 and how I've helped them through difficult times with
11 encouraging words and support. You might be very
12 surprised. There are a lot of them. People that have
13 written me over the years.
14 Q. Are there any -- is there a repository of
15 statements from women that have been alone with you in
16 your room expressing positive support for that
17 interaction?
18 A. I'm not aware of them.
19 Q. Did you ever text with Chris Slatosch at Kameha
20 Con?
21 A. We talked about this, didn't we? I -- I -- I
22 think I told you that I did not text with him at all
23 until after he contacted me three months after canceling
24 me and we -- and decided to re-invite me, and then
25 received pressure from Monica, Chris Sabat, others, I'm

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1 sure, and started going back and forth. I -- I involved
2 my attorney because we had a contract, and I'm sure
3 there were a few interactions by text.

4 Q. Is there a Houston couple, I don't know their
5 full names, that you're good friends with? Does that
6 ring a bell?

7 A. I'm afraid you'll have to be more specific. I
8 -- I lived in Houston 20 years. I have a lot of friends
9 in Houston.

10 Q. All right. How about -- how about this: Is
11 there a Houston couple that helps hire prostitutes, and
12 helps you pick them out and send them to you? Does that
13 ring a bell?

14 A. There was -- there -- there is a friend of mine
15 who told me of a site, which is how I found about the
16 one time that I told you that I tried it.

17 Q. All right. Have you ever -- has any friends or
18 anybody assisted you, in terms of actually hiring --

19 A. No, sir.

20 Q. -- a prostitute and sending her to your room?

21 A. No, sir.

22 Q. What was Star Trek Continues?

23 A. It was a fan-made web series about -- that --

24 that picked up where the original Star Trek ended, and

25 finished the original five-year mission of the

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1 Enterprise from the original series in the '60s.

2 Q. And how many series did -- how many episodes
3 were there?

4 A. We made 11.

5 Q. And is that something you did like a GoFundMe
6 or some type of kick starter for it?

7 A. As a matter of fact, I funded the first episode
8 myself, and then after we made an episode, that
9 basically is a proof of concept -- well, myself and --
10 and -- and another gentleman funded the first episode.
11 And then once we had the first episode and we put it
12 online, people really enjoyed it. We began Crowdfunding
13 to make further episodes.

14 Q. And you made -- ultimately made 11 total?

15 A. Yes, sir.

16 Q. And were you paid by any studio for that?

17 A. I'm sorry?

18 Q. Were you paid by any studio for that?

19 A. No, absolutely not. In fact, we were not
20 allowed -- to this day, we've not sold or -- or made any
21 profit from Star Trek Continues because it's a licensed
22 property. We made it as a -- as a fan series just to
23 celebrate Star Trek.

24 Q. Do you have any films coming out this year?

25 A. I have been contacted by a couple of people

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1 interested in having me do something, but nothing has
2 been done yet, so I don't know when it would be shot, so
3 I certainly don't know when it would be coming out.

4 Q. What about any anime films that are in the can
5 that will be released this year? Rohan for JoJo?

6 A. Yeah, I was going to say there are a couple of
7 -- of -- I believe that's already all been released.
8 But there are a couple of recurring characters that I --
9 that I played, that I don't think they have been
10 released yet, but they've already been recorded.

11 MR. LEMOINE: All right. Let's take a
12 little break. I'll talk to everybody. I think I'm
13 ready to pass the witness.

14 THE VIDEOGRAPHER: And we're going off the
15 record at 4:29.

16 (Break taken from 4:29 p.m. to 4:37 p.m.)

17 THE VIDEOGRAPHER: And we're back on the
18 record for the beginning of disc number 6. The time is
19 4:38.

20 CROSS-EXAMINATION

21 BY MR. JOHNSON:

22 Q. Okay. Mr. Mignogna, my name is Sam Johnson.
23 We met this morning. But have you and I ever met or
24 spoken before that interaction this morning --

25 A. No, sir, not that I know of.

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1 Q. -- that you can recall?

2 Okay. And just so you know, I represent
3 Jamie Marchi in this matter, who's also a Defendant in
4 this case.

5 So I know you've answered a lot of
6 questions today, and I'm going to fill in some gaps that
7 I have in my list, but a lot of -- a lot of what I had
8 has already been addressed, so I'm going to do my best
9 not to duplicate that.

10 Same rules apply. Please allow me to
11 finish my question before you answer. If you need a
12 break, just let me know.

13 A. Yes, sir.

14 Q. All right. Thank you. I wanted to -- to take
15 a few steps back and talk a little bit more about --
16 about your work and about what you do. So I know we
17 talked a little bit about how many productions you've
18 been in, how long ago you started.

19 From what I can tell, not all of your work
20 is in anime; is that correct?

21 A. The vast majority of it is, but not all of it,
22 certainly.

23 Q. Okay. Are there -- other than the Star Trek
24 Continued -- is it continued?

25 A. Continues.

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1 **Q. Continues.**
2 A. That was just a passion project.
3 **Q. Okay. Are there -- are there any other live**
4 **action productions that you've been in?**
5 A. A handful over the years.
6 **Q. Okay.**
7 A. I've done some Christian films and I've done
8 some short films, and --
9 **Q. Are there sub genres of anime that you appear**
10 **in or your voice appears in more than others? I don't**
11 **know the answer. I don't know if that's a thing. Just**
12 **wanted to ask.**
13 A. I would say, no, sir.
14 **Q. Okay.**
15 A. I -- again, when you're talking about 300-plus
16 project -- series, you're talking about every
17 conceivable style and genre.
18 **Q. Uh-huh.**
19 A. Scary, funny, shows for boys, fighting, MECA
20 shows, romance shows, scary. I mean, it -- it covers
21 the gamut.
22 **Q. Okay.**
23 A. And often, I don't even know what I'm going to
24 do until I get in there. I don't even know a lot about
25 what I'm doing until I get in there and they go, you're

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1 this guy.
2 **Q. Okay. So you don't normally get the script --**
3 A. No --
4 **Q. -- very far in advance?**
5 A. -- never in -- no, you don't get it ever in
6 advance.
7 **Q. Okay. I know you've got some social media**
8 **presence. I wanted to walk through and see exactly**
9 **which platforms you have an account on.**
10 A. Okay.
11 **Q. I know you have a Twitter account; is that**
12 **correct?**
13 A. Yes, sir.
14 **Q. Do you have a Facebook account?**
15 A. Yes, sir.
16 **Q. On Facebook -- strike that.**
17 **Do you have an Instagram account?**
18 A. No, sir. I -- I -- I -- I downloaded the app
19 because of all the cool things you can do, like put
20 funny faces and hats and weird things, you know, but I
21 don't ever use it. I've -- I don't think I've ever
22 posted on Instagram once.
23 **Q. How about Snapchat?**
24 A. No, sir.
25 **Q. Any other social media platforms that you**

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1 **regularly use?**
2 A. No, sir. And the only reason I've ever used
3 them is because fans encouraged me to do them as a way
4 to interact with the fans.
5 **Q. Right. And your Twitter account, if I'm -- if**
6 **I remember correctly, is verified; is that right?**
7 A. That -- I -- I think so. That means that they
8 -- they basically verify that you're you?
9 **Q. That's right.**
10 A. I think it's true. There's a dot or something;
11 is that right?
12 **Q. Yeah, there's a blue circle with a little white**
13 **checkmark inside --**
14 A. Okay.
15 **Q. -- next to your -- your name.**
16 A. I believe you.
17 **Q. Did you -- do you remember what you did to get**
18 **that account verified?**
19 A. No, I don't.
20 **Q. Okay. Do you know if you did anything?**
21 A. I don't remember doing anything. In fact, when
22 somebody said something about being verified, I'm like
23 -- I literally said, how does that work, like how -- how
24 do you do that?
25 **Q. Do you use a publicity firm that might have**

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1 **done that for you?**
2 A. No.
3 **Q. Do you use a publicity firm at all?**
4 A. No.
5 **Q. So you do all of your -- your publicity, your**
6 **social media posting, your statements, all that's --**
7 A. Yes, sir.
8 **Q. Let me finish, please.**
9 A. Sorry. Sorry.
10 **Q. All those things, you generate those yourself?**
11 A. Yes, sir. Or I have. I have. Over the years,
12 I have. This incident has been the first time that I
13 have ever sought the services of someone to -- to help.
14 **Q. Okay. So with regard to the -- the statements**
15 **and occurrences that are discussed in this lawsuit, you**
16 **have been receiving some publicity help?**
17 A. Well, the -- the couple that I mentioned --
18 **Q. Okay.**
19 A. -- in particular.
20 **Q. All right.**
21 A. Attorney interaction, of course.
22 **Q. Uh-huh. Any PR firms?**
23 A. No, sir.
24 **Q. Okay.**
25 A. The -- the couple in Florida considers

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1 themselves kind of a PR couple firm, but I don't know if
2 they actually have a name. You know what I mean? I
3 don't know if they're an official thing --

4 **Q. Right.**

5 A. -- but --

6 **Q. I think I understand.**

7 **And you are the voice -- is it Broly or**
8 **Broly?**

9 A. Everybody says something different. I've
10 always thought it was Broly.

11 **Q. Okay.**

12 A. But some people say Broly, so --

13 **Q. And I understand that film, Dragon Ball: Broly,**
14 **was the third highest grossing anime film in the United**
15 **States. Does that sound right to you? Were you pretty**
16 **pleased with that success level?**

17 A. Yeah. It was -- sorry.

18 **Q. Uh-huh.**

19 A. It was a privilege. I was really proud to be a
20 part of it. I mean, I played this character for 15
21 years and he would be in video games and stuff. And
22 when I would do events, fans would always say, oh, I
23 love Broly, he's my favorite character in Dragon Ball.
24 When are they ever going to do anything more with him?
25 And I would always say, I don't know, wouldn't that be

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1 A. No, and I think that's one of the interesting
2 things about voice acting.

3 **Q. Uh-huh.**

4 A. You know, you just -- you're not recognized.

5 **Q. How about when you're at the conventions?**

6 A. Well, I mean, there, yes, because people come
7 there specifically to celebrate anime.

8 **Q. Okay.**

9 A. And because of the internet, you know, you can
10 look up, you know, people's faces and stuff and find out
11 who somebody is who played this character or that.

12 **Q. What is Riseembool?**

13 A. Riseembool was the town that my character and
14 his brother came from in Fullmetal Alchemist.

15 **Q. Okay.**

16 A. So it was literally just a --

17 **Q. Your fans?**

18 A. It was -- yeah, the -- two -- two women started
19 the Riseembool Rangers. I -- I didn't start a fan club,
20 I didn't ask anybody to start a fan club. A couple of
21 fans contacted me and said, We want to start a fan club
22 for you. I'm like, really? Okay. How fun, right? And
23 they came up with the name based on the anime.

24 **Q. Okay. So it was based off of your prior work?**

25 A. Yes, one of the characters that I played.

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1 fun? And then when this movie was announced, you know,
2 I was -- I was real excited about it.

3 **Q. Uh-huh. That's a big deal, you know, third**
4 **highest grossing. And I assume that brings with it a**
5 **pretty significant fan base?**

6 A. I already had -- I think they already existed.

7 **Q. Okay.**

8 A. I -- I -- I think. I don't -- again, I don't
9 do any analytics or count this or that.

10 **Q. Uh-huh.**

11 A. But I -- I -- I think my overall body of work
12 over the years has -- you know, has been pretty well
13 received.

14 **Q. Okay. Yeah, your IMDb page says that you've**
15 **been in over 356 productions. Does that sound --**

16 A. See, I -- I don't even know. I -- I mean, I
17 said over 300, and I didn't even know.

18 **Q. Right.**

19 A. I -- I don't keep track. After a while, you
20 just do them.

21 **Q. Do you ever have that situation where people --**
22 **you know, if you're at the airport or Starbucks or**
23 **whatever, do fans recognize you out --**

24 A. No.

25 **Q. -- in public?**

244

1 **Q. I do want to switch and talk about Jamie**
2 **Marchi, my client, at this point.**

3 **How long have you known Jamie?**

4 A. As long as she's been working at Funimation. I
5 -- I -- I honestly can't tell you an amount of years.

6 **Q. Uh-huh.**

7 A. It's one of those things you don't really think
8 about because you don't think you need to ever really
9 know, but it's been as long as she's -- if I had to
10 guess, maybe 10 or 12 years, maybe.

11 **Q. And so did you meet her working at Funimation?**

12 A. Yes, sir.

13 **Q. And were you-all working on a production**
14 **together, or --**

15 A. We worked on several productions.

16 **Q. Is that how you first met?**

17 A. Actually, it's an interesting dynamic, because
18 voice actors typically record alone, which means you and
19 I, and him, and him, and her, could all be in a show
20 together and never even meet each other because we would
21 come in separately and record our lines. But you might
22 cross paths in the hallway or you might see each other
23 in the lobby.

24 **And many times, you also would do a**
25 **convention and other voice actors would be there. I've**

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1 actually met voice actors for the first time, who I'd
2 been in 8 or 10 shows with, and I'd never met them, but
3 I met them at a convention because we were both invited
4 there. And that's honestly how, more times than not,
5 you actually talk to them more and, you know, get to
6 know them a little more there.

7 Q. So did you ever -- I know you said you've done
8 some live action productions. Was Jamie in any of those
9 with you, that you can recall?

10 A. Not that I can recall, no.

11 Q. Okay. But you-all did interact at conventions?

12 A. Sure.

13 Q. Okay. I do want to go ahead --

14 MR. JOHNSON: What exhibit number are we
15 on?

16 THE REPORTER: 22. Or, you guys, did you
17 already mark something?

18 MR. BEARD: No, we didn't mark anything.

19 THE REPORTER: Okay.

20 (Exhibit 22 marked.)

21 Q. (BY MR. JOHNSON) All right. I'm going to hand
22 you what I've marked as Exhibit 22. And I'll represent
23 to you that this is a cease and desist letter that was
24 sent by your attorney to Ms. Marchi. Have you seen this
25 letter before?

247

1 through with you the statements that your -- your cease
2 and desist letter addressed --

3 A. Okay.

4 Q. -- by Ms. Marchi. And the first one I want to
5 look at is -- is February 6th, 2019, at 9:05 p.m. And
6 there are some quotes in the letter, but if you'll turn
7 back to the --

8 A. Wow.

9 Q. -- fifth page, there's an image of the actual
10 tweet. And I just -- I want to give you a minute to
11 look at it.

12 A. Okay.

13 Q. All right. Is your name mentioned anywhere in
14 this tweet?

15 A. No, sir.

16 Q. Okay. What -- what in here is there to let you
17 know that it references you?

18 A. Well, who is she responding to? Do we have the
19 previous tweet? Clearly, she's responding to someone,
20 right?

21 MR. JOHNSON: Object, nonresponsive.

22 Q. (BY MR. JOHNSON) I'm just asking, based on
23 what you can see on -- on the page, is there anything
24 that would let -- let someone know that it's actually
25 referencing you?

246

1 A. No, sir. I was informed that it was sent, but
2 I have not seen it personally.

3 Q. Okay. I just want to walk through this letter.
4 If you'll look with me, and in the first full paragraph,
5 it says that the demand was relating to posts and tweets
6 using the personal social media account, including
7 @rontoye. Since this is sent to Ms. Marchi, I'm
8 assuming that's a typo. Do you have any reason to
9 disagree with that?

10 A. Can I read that real quick?

11 Q. Please.

12 MR. BEARD: It's a typo.

13 A. I don't know. I don't know what that is
14 relating to.

15 Q. (BY MR. JOHNSON) Okay.

16 A. Can I consult my -- is it a typo? I don't
17 know.

18 Q. I just wanted to make sure there wasn't
19 something I --

20 MR. BEARD: It's a typo.

21 Q. (BY MR. JOHNSON) -- that I wasn't aware of.

22 A. No, I don't --

23 Q. Yeah. Lawyers are humans, too.

24 A. It's the first time I'm seeing it, too.

25 Q. We have typos, so it happens. I want to walk

248

1 A. On this page alone?

2 Q. Correct.

3 A. No, I don't see any -- I do not see my name
4 here.

5 Q. Okay. What -- what are the statements of fact
6 -- if we assume that this is about you, what are the
7 factual statements that are made about you in this
8 tweet? Something that could independently be verified
9 by someone, if you read through it?

10 A. Well, this tweet alone?

11 Q. Uh-huh.

12 A. Nothing.

13 Q. Okay.

14 A. But there -- she tweeted before this, when she
15 initially tweeted her account of something.

16 MR. JOHNSON: Object, nonresponsive.

17 Q. (BY MR. JOHNSON) We'll -- we'll get to her
18 other tweets.

19 A. Okay.

20 Q. I'm only asking about this one, so --

21 A. No, there -- there -- there's nothing in -- in
22 here except a lot of anger, that I can see.

23 MR. JOHNSON: Object, nonresponsive.

24 A. I'm sorry, what was your question?

25 Q. (BY MR. JOHNSON) The question is just what in

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1 this particular tweet on February 6th is a statement of
2 fact about you?

3 A. Nothing.

4 Q. Okay. And then in -- in your letter -- sorry
5 to make you flip back and forth.

6 A. Sure. No worries.

7 Q. But in the paragraph that goes from the first
8 page to the second page, that your lawyer wrote, it says
9 that this tweet implies that you committed some type of
10 criminal offense.

11 Do you see anything in this particular
12 tweet that gives that impression that -- that a criminal
13 offense was committed?

14 A. No, sir. But it's -- you have to take the
15 context of the entire thing.

16 MR. JOHNSON: Object, nonresponsive after
17 no, sir.

18 A. I -- I -- I said, no, sir. I'm sorry, that was
19 -- yeah, that was my response, sorry.

20 Q. (BY MR. JOHNSON) You're fine. That's my job
21 to clean it up.

22 A. Okay.

23 Q. All right. That's all my questions about
24 that -- that tweet. I'm going to skip ahead from the
25 order that they're addressed in in the letter to the

251

1 what is the statement of fact about you in here?

2 A. No statement of fact about me in this tweet.

3 Q. Thank you. I want to go to the last page in
4 this, and there's no date here. But there's another --
5 it's a little harder to tell, I can't tell. I think
6 it's a tweet, also. But there's one that's attributed
7 to Ms. Marchi. Do you see that on this page, as well?

8 A. Here?

9 Q. The third one down.

10 A. Yes.

11 Q. Yes. Give yourself a moment to read that.

12 A. Okay.

13 Q. All right. What is the statement of fact about
14 you in this particular tweet, as you read it?

15 A. The only thing that I can see is where she
16 says, Fighting back does not in any way, shape or form
17 make me as bad as Vic. I would say that tends to create
18 a statement of fact that I'm a bad person.

19 Q. Is that the only statement of fact that you see
20 in there?

21 A. Yes, sir.

22 Q. Do you see anything in that tweet that implies,
23 as you read it, that you are a bad person, akin to a
24 criminal, or that there's any reference to criminal
25 activity in this tweet?

250

1 next one chronologically, which was on February 7th,
2 2019. And that is on the last -- I'm sorry, page 11.

3 A. Okay.

4 Q. Do you see that tweet, it's -- it says What
5 Would Jesus Do?

6 A. Page 11? Oh, goodness.

7 Q. Yeah, the 11.

8 A. I looked down here and I saw one, slash, one
9 and thought it was 11.

10 Q. No problem.

11 A. So sorry.

12 Q. Uh-huh.

13 A. Eight. Am I -- am I blind? Seven -- page 8 is
14 the last page I have here.

15 Q. It's the one before that, sorry.

16 A. Okay.

17 Q. Give yourself a moment to read that.

18 A. Okay.

19 Q. And my questions might sound familiar to you.
20 The first one is, is your name stated in this tweet?

21 A. No, sir.

22 Q. Is there any direct reference to you, that you
23 can see?

24 A. No, sir.

25 Q. If we assume that this tweet was about you,

252

1 A. Not in this tweet, no.

2 Q. Thank you. All right. And then the last one
3 is -- that I want to talk about is, is the one, it's on
4 February 8th, and it's -- it's -- I think might be the
5 one you had in mind a few moments ago, the -- the one
6 that I'm going to refer to as Ms. Marchi's statement.

7 A. Okay.

8 Q. So if I use that term, this is what I'm
9 referring to.

10 A. Yes, sir.

11 MR. BEARD: Counsel, we're going to be here
12 tomorrow. The jury didn't come to a decision so we're
13 in here tomorrow morning.

14 MR. JOHNSON: Okay. Thanks.

15 Q. (BY MR. JOHNSON) So -- and -- and I'm -- I'm
16 wanting -- have you seen this tweet before? It's --
17 it's pretty lengthy. Do you recall having read it
18 before today?

19 A. I'm pretty sure I read it. Somebody said --
20 somebody called me, a friend, and said, Jamie Marchi
21 just tweeted. And I'm like, Jamie, what about? And
22 I -- and then I -- I read it, or somebody, like,
23 Screencapped it and sent it to me.

24 Q. Okay. I actually want to walk back to -- to
25 the second page of -- of this exhibit, the -- the actual

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1 letter your attorney wrote for you. If you'll go to the
2 second page, there are a few statements that they point
3 out that I just want to work through with you.

4 A. Okay.

5 Q. They -- they point out the statement that --
6 that's made, that you, quote, Gave almost all the women
7 at my job the creeps, unquote. Do you see that in
8 there?

9 A. I do.

10 Q. Okay. And then there's the statement that --
11 at -- at the time of the incident, Ms. Marchi's writing
12 about, that you whispered something sexual in nature to
13 her?

14 A. Correct.

15 Q. All right. Do you have any evidence, that
16 you're aware of, that Ms. Marchi did not actually
17 believe these statements to be true at the time she
18 wrote them?

19 A. At the time she wrote them or at the time they
20 happened?

21 Q. At the time she wrote them.

22 A. I can't answer for her. I don't know what's in
23 her mind. I -- I can't say whether she believes it's
24 true or whether she was joining in to pile on. I don't
25 know.

254

1 Q. Are you -- and I know you're not an attorney,
2 sir, but are you aware of anything in the Texas Penal
3 Code that is defined as being simple assault?

4 A. No, sir.

5 Q. You're not aware of any crime or statute that's
6 referred to that?

7 A. I mean, I've heard the term. I don't know
8 the -- the definition or the details of it.

9 Q. Okay. So sitting here today, you don't know if
10 that's actually a crime under Texas law?

11 A. Well, I don't know what it is so -- and I don't
12 -- no, I don't know if it's a crime.

13 Q. I don't either. That's why I was asking. Do
14 you know, are there any crimes in the Texas Penal Code
15 that legally classify a convicted defendant as a
16 predator? Are you aware of any of that?

17 A. I don't know.

18 Q. Would you agree with the statement that the way
19 one person perceives a situation is not always going to
20 be the same way everybody perceives that same situation?

21 A. Of course.

22 Q. So is it possible that Ms. Marchi perceived
23 pain when you pulled her hair in the lobby that day, and
24 that you were unaware of that?

25 And the reason I ask is you testified

255

1 earlier --

2 A. I have -- I -- I had no indication that -- I
3 had no indication when it happened or in the years that
4 followed that we've been friends and interacted that
5 I -- that there was anything offensive or painful about
6 it. In my mind, my recollection, it was very casual,
7 playful interaction as happens all the time in the
8 hallways of Funimation.

9 Q. But you would agree that she certainly could
10 have perceived it differently than you?

11 A. Sure.

12 Q. Is it your testimony today that you did not say
13 something sexual into Ms. Marchi's ear at that moment
14 that you're grabbing her hair?

15 A. Yes. Sorry.

16 Q. You're good.

17 A. Yes, it is, absolutely.

18 Q. Do you recall if you said anything into her
19 ear?

20 A. I don't recall that I said anything. If I did,
21 it was literally something about, ooh, I love your hair,
22 or, love it, it's awesome. You know, it was that kind
23 of a thing.

24 Q. Okay. Other than the statements that we've
25 discussed today, are there any other statements by Ms.

256

1 Marchi about you that are statements of fact that you
2 allege to be defamatory in nature, that -- that you're
3 aware of?

4 A. At present that I'm aware of, no.

5 MR. BEARD: What is the number of this
6 exhibit?

7 MR. JOHNSON: This was Exhibit 22.

8 Q. (BY MR. JOHNSON) I know you've talked today
9 about Defendants having reached out to conventions and
10 encouraging them to end their relationship with you or
11 cancel a contract.

12 Sitting here today, are you aware of any
13 conventions that Jamie reached out to for that purpose?

14 A. I'm going to answer and you're going to say
15 nonresponsive.

16 MR. JOHNSON: Objection, nonresponsive.

17 A. See there, we just saved ourselves six or seven
18 seconds. I have been told by several convention
19 organizers who had booked me to be at their show that
20 they were not inclined to cancel me until voice actors
21 started coming out. Because they -- they weren't going
22 to give a lot of credence to just a bunch of people on
23 the internet, you know.

24 Q. (BY MR. JOHNSON) Uh-huh.

25 A. But -- but when the voice actors came out, and

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1 we all know who the voice actors were that came out, so,
2 I mean, it's kind of an assumption, they didn't call me
3 and say, Jamie Lynn Marchi and Monica Rial, you know
4 what I mean, contacted us, but they did tell me that it
5 was the public comments by the voice actors that led
6 them to ultimately cancel me.
7 Q. So it was the public comments, not -- not
8 necessarily a direct contact by a particular voice actor
9 to the convention?
10 A. I don't know.
11 Q. Okay.
12 A. I don't know if there was any direct contact or
13 not.
14 Q. So sitting here today, you don't know of any
15 conventions that Jamie directly reached out to, correct?
16 A. Not yet, no. Not at present.
17 Q. And then I think it was Ms. -- Ms. Denbow at
18 Funimation that you were communicating with while they
19 were conducting their investigation; is that correct?
20 A. Tammi Denbow, I think she's with Sony, not with
21 Funimation.
22 Q. Okay. Thank you for -- for clarifying that.
23 A. I'm pretty sure; is that right?
24 Q. And I believe you testified earlier that she
25 mentioned some of the people who had outcried --

258

1 A. Yes, sir.
2 Q. -- to Sony or to Funimation?
3 Did she ever mention Jamie during that
4 process?
5 A. No, sir.
6 Q. Looking at your original petition filed in this
7 lawsuit, just tracking that timeline, did you read the
8 original petition in this case --
9 A. This one?
10 Q. -- what your -- what your lawyer filed to
11 initial -- initiate the lawsuit?
12 A. No, sir.
13 Q. Okay. I'm just going to --
14 A. It probably would have looked very -- like,
15 what is this, Latin? I mean, you know, I just kind of
16 trust him to do what he does.
17 Q. I hear you. Well, I want to walk through a
18 timeline with you --
19 A. Okay.
20 Q. -- and I want to see if this sounds about
21 correct, as far as your terminations from certain
22 conventions earlier this year.
23 On January 18th of this year, the Phoenix
24 Fan Fusion Convention canceled your appearance --
25 A. Yes, sir.

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1 Q. -- there?
2 A. That was the first one.
3 Q. And then January 29th, I think was roughly when
4 Funimation terminated your contract with them?
5 A. 20 -- again, I think, what did we say, 27, 28,
6 26, 27?
7 Q. Late January?
8 A. Yes, sir.
9 Q. Okay. January 30th, Anime NYC and Anime
10 Milwaukee canceled your appearances there; is that
11 right?
12 A. I don't -- I'm sorry.
13 Q. That's okay.
14 A. I don't remember the dates.
15 Q. Late January, does that sound about right? I'm
16 not trying to trick you, I'm just --
17 A. I know you're not, and I'm not trying to be
18 evasive.
19 Q. Right.
20 A. I was a mess. I don't remember.
21 Q. Okay.
22 A. I don't remember dates of these things. I knew
23 they were happening and it was kind of a --
24 Q. Uh-huh.
25 A. You know, it was a -- a cumulating thing.

260

1 Q. I guess my question is, if the first public
2 statement by Jamie on Twitter, which -- which you allege
3 to be defamatory, obviously, Ms. Marchi and I would not
4 agree with that, but if the first one is dated
5 February 6th, I'm trying to figure out how that could
6 have impacted these conventions' decisions prior to the
7 date of her tweets that -- that the cease and desist
8 letter referenced.
9 A. It didn't impact the conventions prior to her
10 -- to her -- her state -- her public statement,
11 obviously. But there were, certainly, events that
12 canceled me after, and there are presumably events and
13 production companies who might have been -- have had me,
14 and when they saw these things, they decided not to.
15 MR. JOHNSON: Object, nonresponsive after
16 the word obviously.
17 Q. (BY MR. JOHNSON) Did you ever have any
18 conversations with Chuck Huber about Jamie's online
19 posts or tweets?
20 A. Yes.
21 Q. What were those conversations?
22 A. He contacted me shortly after she had posted.
23 And he said that -- he's like, I -- Jamie was my writing
24 partner and I've always had a great relationship with
25 her and I -- you know, I don't know why she would say

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1 this.

2 And my response was basically, Dude, you

3 know, I don't -- I don't know where this came from. I

4 was completely floored when -- when she posted that.

5 And like I said, I've had many interactions with her

6 over the years since this alleged incident and they have

7 all been positive and friendly. So I -- I -- I told

8 Chuck that, and he told me that -- you know, that he --

9 he was concerned because he had written with Jamie, and

10 she was a writing partner of his, and they were good

11 friends.

12 Q. Okay. Did you ever text with him about Jamie?

13 A. I don't recall that I did.

14 Q. Email?

15 A. Not that I recall.

16 Q. What -- what current model -- what's your phone

17 that you use?

18 A. iPhone.

19 Q. An iPhone. Do you know what model it is?

20 A. It's the X, the 10.

21 Q. Okay.

22 A. Yes, sir.

23 Q. How long have you had that phone?

24 A. A couple of months, I think.

25 Q. Okay. So since what, March, April?

262

1 A. Maybe. Maybe. Maybe.

2 Q. Okay. What was your prior phone that you had?

3 A. iPhone 9.

4 Q. Okay.

5 A. I've had every version of them.

6 Q. Did you keep the iPhone 9 when you upgraded to

7 the 10?

8 A. I sold it or I was -- I intended to sell it.

9 Q. Okay. Did your text messages, to the extent

10 any hadn't been deleted as part of your -- what you

11 testified about earlier, were those transferred to your

12 new iPhone, your text message conversations?

13 A. I -- I assume so. You know how you do the --

14 you do the backup --

15 Q. Uh-huh.

16 A. -- and then when you buy the new phone, you --

17 the first thing you tell it to do is restore from

18 backup.

19 Q. Right.

20 A. But as I mentioned earlier with -- with the

21 other gentleman, I -- I don't like to scroll through 55

22 text message conversations. Once a conversation is

23 over, I'll get rid of it so it's easier to find the ones

24 that are current and ongoing.

25 Q. You mentioned earlier that you have an

263

1 accountant that helps you with your financial --

2 A. Yes, sir.

3 Q. -- reporting. What is the accountant's name?

4 A. Frank Pacella.

5 Q. Could you spell Pacella, please.

6 A. Sure. P-A-C-E-L-L-A.

7 Q. Where is Frank?

8 A. He lives in New York.

9 Q. Okay. Do you happen to know his email address

10 or his phone number offhand?

11 A. Not offhand. Can --

12 MR. BEARD: I can provide all that.

13 MR. JOHNSON: Thank you.

14 Q. (BY MR. JOHNSON) Were you scheduled to appear

15 at Tekkoshoccon in 2010?

16 A. Wow. That was a lot of events ago and almost

17 10 years. I -- I -- I don't -- well, yeah, wasn't that

18 the -- I believe that the rumors panel that he

19 referenced --

20 Q. Uh-huh.

21 A. -- mentioned Tekkoshoccon 2010, so I -- I assume

22 I was there.

23 Q. Okay.

24 A. I mean --

25 Q. Do you recall being uninvited from Tekkoshoccon

264

1 --

2 A. No, sir.

3 Q. -- at any time?

4 A. No, sir. I wasn't there for -- I -- I was not

5 there for several years, and then -- and then about

6 three years ago, they invited me to do an event in

7 Pittsburgh. It was run by the same people that ran

8 Tekkoshoccon. So they invited me to that event, and I

9 did it, and then they said we need to get you back to

10 Tekkoshoccon. And about, like the following year or two

11 years after, based on availability, I went back to

12 Tekkoshoccon.

13 Q. So there was nothing with your nonappearance at

14 Tekkoshoccon that arose from allegations that you were

15 stalking someone --

16 A. No.

17 Q. -- that you can recall?

18 A. No.

19 (Exhibit 23 marked.)

20 Q. (BY MR. JOHNSON) I do want to give you one

21 more exhibit. And I'm going to mark this as Exhibit 23.

22 And I'll represent to you that that one's --

23 A. Oh, I'm sorry.

24 Q. Sorry.

25 THE WITNESS: Oh, okay.

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1 Q. (BY MR. JOHNSON) She's going to attack us if
2 we don't keep the right exhibits --
3 A. Okay.
4 Q. -- down here when the deposition is over.
5 A. Stay over there.
6 Q. I'll represent to you that this is a letter
7 that your attorney sent to Ms. Marchi in March of 2009,
8 I'm sorry, 2019, informing her that she needed to
9 preserve all electronically-stored information, data,
10 all that kind of stuff.
11 Do you agree that if -- if you, whether
12 directly or through an attorney were instructing the
13 other parties to this lawsuit to preserve all electronic
14 information that might relate to this case, that you
15 should be doing that also, at least as of that date?
16 A. I suppose.
17 Q. Okay.
18 MR. JOHNSON: I'll pass the witness.
19 CROSS-EXAMINATION
20 BY MR. VOLNEY:
21 Q. Hi, Mr. Mignogna, my name is John Volney. I
22 represent Funimation. The first time we met was this
23 morning before this event started, correct?
24 A. Yes, sir.
25 Q. So I just have a few follow-up questions. I

266

1 want to start out with the timeline. On January 16th
2 was the date that the latest Broly movie was released?
3 A. Yes, sir, in theaters.
4 Q. In theaters. And that was the same date that
5 these social media posts started to happen that were
6 accusing you of inappropriate behavior?
7 A. Yes, sir.
8 Q. Did you, at that time, communicate to anyone at
9 Funimation about those social media posts that were
10 coming out about you?
11 A. Yes.
12 Q. Who did you communicate with?
13 A. Justin Cook.
14 Q. What did you tell Mr. Cook?
15 A. I was in recording and -- for that Monokean
16 show that I -- that they tweeted that I was replaced in.
17 And I had spoken with him. He was telling me -- he was
18 showing me the -- the demographics and -- or not the
19 demographics, what do you call it, the analytics, you
20 know what I mean, of how well the movie was doing, and I
21 was in his office, and I -- I mentioned the -- the --
22 the -- the -- the Twitter stuff that had just started at
23 that point. And he said -- he -- he was very much in
24 agreement, he was like, it's a bunch of garbage. I
25 know, it's -- it's just, what a bunch of garbage. And

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1 we both agreed that it was, you know, just unfortunate
2 fan garbage.
3 Q. This was not the first time that this sort of
4 what you called fan garbage had come out coincident with
5 the release of a movie where you provided a voice --
6 voice?
7 A. Or an anime series. Not a movie, but anime
8 series.
9 Q. Anime. So this had happened before?
10 A. Yes, sir.
11 Q. And so did you have any other conversations
12 with Funimation at that time?
13 A. Not that I recall, no, sir.
14 Q. What does Justin Cook do for Funimation?
15 A. He's -- you know, he kind of oversees all of
16 the directors, I -- I believe. I'm -- I'm kind of
17 embarrassed to say that I don't know what his actual
18 title is. I want to say head of production, but I -- I
19 don't think -- I don't know if that's it for sure. He's
20 been there many -- he and I have been friends, I
21 believed, for a very long time.
22 Q. When was the next time you had any contact from
23 anyone at Funimation about the -- the social media
24 uproar that was going on?
25 A. When the human resources woman called me and

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1 said that -- that someone from Sony wanted to have a
2 conversation with me.
3 Q. And was the next contact after that human
4 resources call the communication you got from Tammi
5 Denbow at Sony?
6 A. Yes, sir.
7 Q. And then -- did you then participate in an
8 interview with Ms. Denbow?
9 A. We had a phone conversation where she raised
10 the three incidents.
11 Q. How long did that phone conversation last?
12 A. Maybe half an hour, 40 minutes. I -- I don't
13 recall, specifically.
14 Q. Was anyone on the phone besides you and Ms.
15 Denbow?
16 A. No, sir.
17 Q. Did you take any notes?
18 A. No, sir.
19 Q. How did that phone conversation end?
20 A. With her saying that they would -- that she
21 would take the information she gathered from me and
22 review -- and review it with other people, I don't know
23 who, and get back to me with their decision on it.
24 Q. Did you consider yourself honest and truthful
25 in your communications with Ms. Denbow?

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1 A. Absolutely.

2 Q. Did you, in that conversation, explain to Ms.

3 -- to Ms. Denbow that you sometimes had hugs and kisses

4 with fans at anime conventions?

5 A. Probably.

6 Q. Tell me, how is it that you get signed up to be

7 a participant at -- at an anime convention.

8 A. The convention organizers will contact people

9 in the industry and invite them to come for the purpose

10 of, you know, attracting fans to come and meet the guy

11 who wrote this show, or the woman who directed that

12 show, or the guy who played this character in this show,

13 or this artist, or --

14 Q. Who handles it for Vic? Do you, Mr. Mignogna,

15 take the phone calls and get the text messages yourself

16 or do you have somebody who handles this for you, like

17 an agent?

18 A. The vast majority of them are me, and it's

19 because I've been doing it since they started. Even

20 Monica and -- can tell you that when we started in this

21 industry 20 years ago, there were only a handful of --

22 very few con -- anime -- anime-specific conventions.

23 And they were much smaller, they were in

24 hotels and, you know, very small venues. And the

25 conventions would contact us and just basically say,

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1 we'll give you a hotel room and we'll buy you a plane

2 ticket, that's about all we got for you. And -- and so

3 we would go and sign autographs and do Q and A sessions

4 with the fans and talk about Dragon Ball, or whatever

5 show the fans were interested in.

6 And over the years, the conventions

7 continued to grow, they kept popping up and -- but I had

8 a relationship with a large number of the convention

9 organizers personally.

10 Q. So they would just contact you directly?

11 A. Yes, sir.

12 Q. And would they do it via email, via telephone

13 call, via text message?

14 A. Every way.

15 Q. And so I understand from your earlier

16 testimony, for some of those conventions you actually

17 had a written contract, fair?

18 A. Not back then.

19 Q. I'm talking about in January 2019 --

20 A. Yes, sir.

21 Q. -- until today.

22 A. Yes, sir.

23 Q. Fair?

24 A. Yes, sir.

25 Q. You had a contract with many of them?

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1 A. Yes, sir.

2 Q. And then some of them you didn't have a

3 contract, it was more of just a verbal agreement?

4 A. Yes, sir.

5 Q. When a convention canceled you, beginning -- I

6 think you say the first one canceled you in -- on

7 January 18th of 2019, and that was the Phoenix Fan

8 Fusion event, how did that get communicated to you?

9 A. The organizer, Matt Solberg, called me.

10 Q. For any of the conventions that you claim were

11 canceled as a result of the -- the tweeting by any of

12 the parties here, or social media uproar, have you kept

13 records of the -- the communication, like the -- the

14 text message or the email?

15 A. I feel like I have to -- to a degree. There

16 have been some of these conventions, a number of them

17 this year, the ones that we're speaking of right now,

18 that the men -- the men -- the gentleman that I

19 mentioned earlier, Gary Hassen, had represented me to

20 those events. And they contacted him, told him that

21 they were canceling my appearance, and he called me and

22 said, Megacon has canceled you or Emerald City has

23 canceled you.

24 Q. For example, when you say in your petition that

25 Anime NYC and Anime Milwaukee canceled your appearance

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1 on January 30th, 2019, are you referring to a text

2 message, an email or a phone call?

3 A. Anime NYC emailed me.

4 And what were the other ones you mentioned,

5 sir?

6 Q. Anime Milwaukee.

7 A. Anime Milwaukee? I honestly don't remember

8 whether they called me or sent me an email.

9 Q. Do you know whether you were signed up or

10 slated to appear at Anime Milwaukee as of January 30th,

11 2019?

12 A. I can -- I can -- I can check my schedule. If

13 I was canceled, I can only assume that I was scheduled

14 to go.

15 Q. And in terms of the person who would have the

16 records of being scheduled and being canceled by a

17 particular convention, that would be you?

18 A. Yes -- well, for Anime Milwaukee, yes, sir.

19 Q. Which ones did this gentleman, Gary Hassen,

20 handle for you?

21 A. Gary Hassen only handled the pop culture

22 events, like a multi-genre event. I -- I -- he -- I --

23 I never wanted him to involve himself with the

24 anime-specific conventions, mostly because it's a

25 different -- it's a completely different dynamic, and I

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1 had an ongoing long relationship with a lot of the
2 organizers myself, and --
3 Q. Fair. I take it within a -- you've testified
4 that within a few days of your conversation on the
5 telephone with Ms. Denbow, you had a further
6 conversation with the folks at Funimation, where they
7 communicated to you that they were terminating your
8 relationship, fair?
9 A. No, sir. I did not speak with Funimation. A
10 couple of days after my initial conversation with Ms.
11 Denbow, she called me back, and there was someone else
12 on the line, a gentleman. I -- I don't remember his
13 name. And they were the ones on the phone that informed
14 me that my employment with Funimation was terminated.
15 Q. Was Karen Micah on the phone?
16 A. Maybe. Possibly.
17 Q. Was Zack Hall from Sony on the phone?
18 A. I don't remember the names.
19 Q. What do you recall about what they told you?
20 A. They told me, quote, We have finished reviewing
21 the -- the situation and concluded that your
22 termination -- your employment with Funimation is
23 terminated, effective immediately.
24 Q. Now, you said employment. At the time, you had
25 an independent contractor agreement with Funimation; is

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1 that right?
2 A. Yes, sir.
3 Q. You weren't like a W-2 employee where they
4 provided you benefits; you got paid by the hour --
5 A. Yes, sir.
6 Q. -- for your voice acting, fair?
7 A. Yes, sir. Sorry.
8 Q. And then did Funimation make any public
9 statement at the time that it terminated you?
10 A. No, sir. In fact, as I mentioned earlier, they
11 told me on the phone that they had no intention of
12 making any public statement, and I didn't either.
13 Q. Did you, thereafter, make any public statements
14 about the social media uproar situation that was going
15 on?
16 A. Relating to what specifically?
17 Q. Relating to Funimation's termination of the
18 relationship.
19 A. No, sir.
20 Q. Did you --
21 A. I was rather ashamed. I was embarrassed.
22 Q. Got it. You have a personal Twitter account, I
23 take it?
24 A. Yes, sir.
25 Q. And you, from time to time, have issued tweets

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1 that relate to the social media uproar that we've been
2 talking about today; is that fair?
3 A. Yes, sir.
4 Q. Mr. Lemoine asked you some questions about this
5 subject matter. I don't really want to go into it in
6 detail. But my understanding from looking at these
7 posts and some of the tweets is that there was quite a
8 bit of turmoil and strife between the #kickvic
9 supporters and the #istandwithvic supporters; is that
10 fair?
11 A. Yes, sir.
12 Q. Were you concerned about that at any time?
13 A. Yes, I was.
14 MR. VOLNEY: So what's the next exhibit
15 number?
16 MR. BEARD: 24 [sic].
17 MR. VOLNEY: 24. Can I have a sticker?
18 (Exhibit 27 marked.)
19 Q. (BY MR. VOLNEY) Right here it's going to show
20 you Exhibit 24. Is this a tweet that you published on
21 February 8th, 2019?
22 A. I assume so, yes.
23 Q. In your tweet you say that it has come to your
24 attention that there have been threats made toward
25 others by fans in support of me. Do you see that?

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1 A. Yes, sir.
2 Q. What are you referring to there?
3 A. I had heard just through the normal, you know,
4 gossip and interaction that -- that people were making
5 threatening statements.
6 (Sneeze.)
7 THE WITNESS: Bless you.
8 MR. JOHNSON: Bless you.
9 A. I had not seen any of those statements. I -- I
10 don't even -- honestly, don't even know if such
11 statements ever existed. I never saw any. But all you
12 need to do is tell me, hey, your fans have threatened to
13 do this, and I -- and I tweeted, hey, don't do that.
14 Q. (BY MR. VOLNEY) Part of the point of this
15 February 8th tweet is to let the folks -- any folks who
16 might be engaged in threatening or intimidating
17 behavior, that they shouldn't do that, fair?
18 A. Let me be clear, perfectly clear. I would
19 never condone that.
20 Q. And that's, in fact, what you say in the tweet?
21 A. Yes, sir.
22 Q. And do you know if this particular tweet had
23 any effect on that sort of online fighting that was
24 going on?
25 A. I don't know. I hope so.

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1 MR. BEARD: Counsel, this should be 27, not
2 24.
3 (Discussion off the record.)
4 Q. (BY MR. VOLNEY) Now, we spent a lot of time
5 today talking about Monica Rial and Jamie Marchi.
6 What is it that you allege that Funimation
7 did to harm you or to defame you?
8 A. After -- well, first of all, I don't believe
9 they really had any legitimate reason to do what they
10 did. After the conversation ended with Ms. Denbow, I
11 honestly believed that when they called me back they
12 were going to say you're on some kind of probation for a
13 year, you know what I mean, and if we have any other
14 complaints, then -- you know what I mean? That's really
15 what I thought would happen.
16 So when -- when they terminated me, you
17 know, I was -- I -- surprised, to say the least. And
18 the last thing she said was, like I mentioned earlier,
19 we're not going to be making any public statements. And
20 then a week later, roughly, a week or 10 days later,
21 Funimation, someone at Funimation, from Funimation's
22 account, tweeted that I was being replaced, and they
23 continued to tweet that they don't condone sexual
24 harassment, which, you know, any reasonable person would
25 infer that that's what they were terminating me for.

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1 And -- and that did an enormous amount of damage.
2 Q. Let me ask you, let's look at Exhibit 7. It
3 should be in that notebook in front of you. Is that the
4 February 11 Funimation tweet, Exhibit 7?
5 A. Yes, sir. Yes, sir.
6 Q. Does Funimation, anywhere in that Twitter
7 thread, use the word sexual?
8 A. No, sir.
9 Q. Do you know whether Funimation condones any
10 kind of harassment or threatening behavior being
11 directed at anyone?
12 A. I don't know. I would -- I don't know.
13 Q. I think you testified earlier that with respect
14 to the -- the first tweet on this page, Exhibit 7,
15 there's nothing untrue about that particular statement,
16 fair?
17 A. Yes, that was just a statement of fact, that I
18 had been recast in that show.
19 Q. And then looking at the subsequent tweets, you
20 would agree with me that there's nothing untrue about
21 the following statement, part of our core mission is to
22 celebrate the diversity of the anime community and to
23 share our love for this genre and its positive impact on
24 all, fair? Nothing untrue about that?
25 A. Nothing what about it?

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1 Q. There's nothing untrue about that.
2 A. I can't speak to what Funimation's core mission
3 is. I mean, only Funimation can do that.
4 Q. Okay. Fair. Do you -- do you share that core
5 mission yourself?
6 A. Absolutely.
7 Q. And with respect to the second sentence of the
8 next tweet, which I think is clarified at the bottom,
9 Funimation makes the statement, we do not condone any
10 kind of harassment or threatening behavior being
11 directed at anyone. Do you see that?
12 A. Yes, sir.
13 Q. They don't mention Vic Mignogna in that
14 sentence at all, do they?
15 A. No, sir.
16 Q. And what your argument is, that you must infer
17 that they're referring to your conduct, fair?
18 A. Yes, sir.
19 Q. Now, is this the only public statement that
20 Funimation has made about the Vic Mignogna situation,
21 that you're aware of?
22 A. As far as I know, yes.
23 Q. Certainly, from February 11th, 2019 to today,
24 there have not been any other tweets by Funimation --
25 A. No, sir.

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1 Q. -- that you're aware of, fair?
2 A. No, sir.
3 Q. I just have a few follow-up questions here and
4 I think we can wrap this up. If a particular convention
5 terminated you before February 11th, 2019, you would
6 have to agree that that -- that particular convention
7 did not terminate you because of Funimation's tweet,
8 fair?
9 A. Not necessarily.
10 Q. Why do you say that?
11 A. Well, if someone from Funimation privately
12 contacted a convention and said, we're not going to
13 sponsor your show if you have this guy, and then the
14 convention contacts me and says, we're not having you;
15 now, I don't know that that happened, but I don't know
16 that it didn't, so not necessarily.
17 Q. Well, assuming that didn't happen and the only
18 public statement by Funimation about its termination of
19 you is this February 11th tweet, then Funimation's
20 communication could not have caused a termination of a
21 convention that -- that occurred to you before
22 February 11th, fair?
23 A. No, I'm not going to assume that that didn't
24 happen.
25 Q. Do you have any personal knowledge of any such

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1 event occurring?
2 A. Not yet, but I -- I have been -- as I mentioned
3 earlier, I -- I have heard rumblings from the convention
4 community and organizers and my -- and Gary Hassen that
5 a sponsor, a large sponsor, who was fostering
6 relationship with one of the large convention organizers
7 put enormous pressure on the conventions not to have me.

8 Q. Is --

9 MR. BEARD: John?

10 MR. VOLNEY: Yes.

11 MR. BEARD: I don't think he understood the
12 question. If I could jump in.

13 He's asking did the tweet itself, just the
14 tweet, cause any damage before it was sent out?

15 MR. VOLNEY: Right.

16 THE WITNESS: No, I thought -- no --

17 Q. (BY MR. VOLNEY) Yeah, okay, so let me back up
18 because it was a long question. It was a long question.

19 A. I thought you asked me if Funimation couldn't
20 have had any involvement before the tweet, and my answer
21 is, sure they could, privately, in closed back channels.

22 Q. Right. But in terms of what you know, you
23 don't know any specific conduct by Funimation that
24 occurred privately in back channels to somehow stymie
25 you from getting a convention job or keeping a

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1 for whatever reason and wanted me gone. Did not want me
2 to play the character Broly that I had been playing for
3 15 years. And I -- I -- so to ask me the question, your
4 question was, who at Funimation would do that --

5 Q. Well, when you say --

6 A. -- I think it's been established there are
7 people at Funimation that don't like me much and wanted
8 me gone.

9 Q. Well, when you say that there are people at
10 Funimation who don't like you much and wanted you gone,
11 who are you referring to specifically?

12 A. Chris Sabat.

13 Q. Is he a Funimation --

14 A. Oh, I would --

15 Q. -- employee?

16 A. I would say he has a great deal of weight at
17 Funimation, a great deal of weight. And, I mean -- yes,
18 he is, probably. Funimation outsources production to
19 his studio. Chris Sabat has been involved with
20 Funimation since Funimation was in the Frost Bank
21 building in -- you know, on 820, when I started working
22 there. So Chris Sabat, for one.

23 Q. Who else?

24 A. I would say other voice actors and directors.

25 Q. Can you name names?

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1 convention job, fair?

2 A. We -- I'm so sorry, John, please say it again.

3 Q. It sounds to me like you've heard rumors or
4 you've made assumptions that Funimation may have done
5 something privately as a sponsor of a convention to get
6 you canceled, fair?

7 A. Yes, sir.

8 Q. Other than rumors, do you have any other
9 evidence of that sort of behavior by Funimation?

10 A. Not at present.

11 Q. Who at Funimation would even do that?

12 A. I would encourage you to look at some of the
13 statements made by Monica Rial and Jamie Marchi and Ron
14 Toye, talking about Funimation this and Funimation that,
15 and Funimation knows this, and everybody at Funimation
16 that, and, I mean, they have -- they have, you know --
17 what's the word I'm looking for, brandished the
18 Funimation name and, you know --

19 Q. Is --

20 A. And -- and I'm quite certain -- I'm -- I'm
21 sorry.

22 Q. Go ahead.

23 A. I -- I -- I can only -- again, I can only
24 assume, I think a reasonable person would assume that
25 there were entities at Funimation that did not like me

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1 A. Do I have to? I mean, I'm not --

2 Q. Yeah, I mean --

3 A. -- a name namer. I'm not that kind of a
4 person.

5 Q. This is kind of a bridge-burning exercise we're
6 going through so let's burn the bridges.

7 A. Yeah, the bridge is kind of burned, isn't it?

8 Q. Yeah. I have to say this is my chance to ask
9 you questions.

10 Who besides Chris Sabat at Funimation?

11 A. I would wager that voice actors like Monica
12 Rial, Jamie Marchi, Michael -- J. Michael Tatum, by
13 their own admission on the -- on the Twitter storm,
14 other voice actors that have been employed by Funimation
15 for many, many years, Mike McFarland, Colleen
16 Clinkenbeard, Daman Mills, Sean Schemmel.

17 See, what -- what Funimation may not get is
18 that these voice actors have been employed by them for
19 many years, and when they speak, the public at large
20 sees Funimation.

21 Q. Got it. Is Ron Toye a voice actor?

22 A. No, sir.

23 Q. What is he? What does he do for a living?

24 A. I don't know.

25 Q. Does he -- does he have any business type of

DEPOSITION OF VICTOR MIGNOGNA
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1 relationship with Funimation?
2 A. I don't know. I don't even really know him.
3 Q. So do you ever go to Funimation -- when you
4 were working for Funimation, I take it you would
5 occasionally go to their studios?
6 A. Yes, sir.
7 Q. Did you ever see Ron there?
8 A. Not to my recollection, unless I passed him in
9 the course of, you know, in the hallway. He's Monica's
10 boyfriend. That's -- that's his connection here, as far
11 as I know.
12 Q. Okay. So in terms of what you know about Ron's
13 connection to Funimation, it is that Ron is Monica
14 Rial's boyfriend?
15 A. That's my only knowledge of Ron Toye.
16 Q. And, to your knowledge, Monica is a voice actor
17 who occasionally works on an hourly basis for
18 Funimation, fair?
19 A. No, sir. She works a lot, for many years, and
20 has directed at Funimation. I -- I would bet --
21 Q. Similar to your relationship with Funimation
22 that you talked about earlier?
23 A. Sure. Yes.
24 MR. VOLNEY: Okay. Those are all the
25 questions I have. Thank you.

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1 THE WITNESS: Thank you, John.
2 MR. LEMOINE: Nothing further.
3 MR. JOHNSON: We'll reserve.
4 MR. BEARD: Pass the witness.
5 You're done.
6 THE VIDEOGRAPHER: And we're going off the
7 record at 5:39 p.m.
8
9 (Deposition concluded at 5:39 p.m.)
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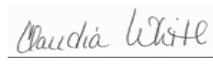

1 CHANGES AND SIGNATURE
2 WITNESS NAME: VICTOR MIGNOGNA DATE: JUNE 26, 2019
3 PAGE LINE CHANGE REASON
4 _____
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1 I, VICTOR MIGNOGNA, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.
4
5 _____
6 VICTOR MIGNOGNA
7 THE STATE OF _____)
8 COUNTY OF _____)
9
10 Before me, _____, on this day
11 personally appeared VICTOR MIGNOGNA, known to me (or
12 proved to me under oath or through
13 _____) (description of identity
14 card or other document) to be the person whose name is
15 subscribed to the foregoing instrument and acknowledged
16 to me that they executed the same for the purposes and
17 consideration therein expressed.
18 Given under my hand and seal of office this
19 _____ day of _____, _____.
20
21
22 _____
23 NOTARY PUBLIC IN AND FOR
24 THE STATE OF _____
25 COMMISSION EXPIRES: _____

DEPOSITION OF VICTOR MIGNOGNA

June 26, 2019

<p style="text-align: right; margin-bottom: 0;">289</p> <p>1 NO. 141-307474-19 2 VICTOR MIGNOGNA,) IN THE DISTRICT COURT 3) 4 Plaintiff,) 5) 6 VS.) TARRANT COUNTY, TEXAS 7) 8) 9 FUNIMATION PRODUCTIONS,) 10 LLC, JAMIE MARCHI, MONICA) 11 RIAL, and RONALD TOYE,) 12) 13 Defendants.) 141st JUDICIAL DISTRICT 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 25)</p> <p style="text-align: center;">REPORTER'S CERTIFICATION DEPOSITION OF VICTOR MIGNOGNA JUNE 26, 2019</p> <p>I, Claudia White, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following: That the witness, VICTOR MIGNOGNA, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness; That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature and return to CSI Global Deposition Services by _____; That the amount of time used by each party at the deposition is as follows: Mr. Ty Beard, Esq. - 00 HOURS:00 MINUTE(S) Mr. J. Sean Lemoine, Esq. - 03 HOURS:40 MINUTE(S) Mr. Sam Johnson, Esq. - 00 HOURS:30 MINUTE(S) Mr. John Volney, Esq. - 00 HOURS:30 MINUTE(S) That pursuant to information given to the</p>	<p style="text-align: right; margin-bottom: 0;">291</p> <p>1 FURTHER CERTIFICATION UNDER RULE 203 TRCP 2 The original deposition was/was not returned to the 3 deposition officer on _____; 4 If returned, the attached Changes and Signature 5 page contains any changes and the reasons therefor; 6 If returned, the original deposition was delivered 7 to Mr. Sean Lemoine, Custodial Attorney; 8 That \$ _____ is the deposition officer's 9 charges to the Defendants for preparing the original 10 deposition transcript and any copies of exhibits; 11 That the deposition was delivered in accordance 12 with Rule 203.3, and that a copy of this certificate was 13 served on all parties shown herein on and filed with the 14 Clerk. 15 Certified to by me this _____ day of 16 _____, 2019. 17 18 19 20 21 22 23 24 25</p> <div style="text-align: right; margin-top: 20px;">  <hr style="width: 100%; border: 0.5px solid black;"/> Claudia White Texas CSR #8242 Expiration Date: 5/31/21 Firm Registration No. 526 CSI Global Deposition Services 4950 N. O'Connor Road, Suite 152 Irving, Texas 75062 (877) 784-0004 fax (972) 650-0225 production@courtroomsciences.com </div>
<p style="text-align: right; margin-bottom: 0;">290</p> <p>1 Deposition officer at the time said testimony was taken, 2 the following includes counsel for all parties of 3 record: 4 Mr. Ty Beard, Esq., Attorney for Plaintiff 5 Mr. J. Sean Lemoine, Esq., Attorney for Defendant 6 Monica Rial and Ronald Toye 7 Mr. Sam Johnson, Esq., Attorney for Defendant 8 Jamie Marchi 9 Mr. John Volney, Esq., Attorney for Defendant 10 Funimation 11 I further certify that I am neither counsel for, 12 related to, nor employed by any of the parties or 13 attorneys in the action in which this proceeding was 14 taken, and further that I am not financially or 15 otherwise interested in the outcome of the action. 16 Further certification requirements pursuant to Rule 17 203 of TRCP will be certified to after they have 18 occurred. 19 Certified to by me this 1st day of July, 2019. 20 21 22 23 24 25</p> <div style="text-align: right; margin-top: 20px;">  <hr style="width: 100%; border: 0.5px solid black;"/> Claudia White, Texas CSR #8242 Expiration Date: 5/31/21 Firm Registration No. 526 CSI Global Deposition Services 4950 N. O'Connor Road, Suite 152 Irving, Texas 75062 (877) 784-0004 fax (972) 650-0225 production@courtroomsciences.com </div>	



Amelia
@ActuallyAmelia

Follow

How is Vic Mignogna still working in anime? Every time assault in fandom comes up in a conversation, no matter who I talk to, so does his name. Every time. At some point an open secret becomes common knowledge and inaction becomes inexcusable.

[twitter.com/enta_jinnai/st ...](https://twitter.com/enta_jinnai/st...)

This Tweet is unavailable.

6:33 PM - 16 Jan 2019

1,750 Retweets 2,450 Likes



61 1.8K 2.5K



Tweet your reply



Mur @ Work Hiatus @BOKHOOTOS · Jan 16

Replying to @ActuallyAmelia @vladof_sickle

It's frustrating to see him practically RUIN new projects, too. Im 100% convinced that he's so solidly in Funi that he can get any role he wants if he demands it. As a congoer, I've heard HUNDREDS of stories about what a creep he is, and I'm always floored he still gets invites.



ANIME MOVIES ENTERTAINMENT

Dragon Ball Super: Broly voice actor responds to sexual harassment, homophobia claims

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Though lots of allegations began to surface recently, some go as far back as 2010

By Petrana Radulovic | @Pet_rana | Jan 25, 2019, 6:38pm EST



Vic Mignogna attends the premiere of *Dragon Ball Super: Broly* in December 2018. | Rich Fury/Getty Images for Funimation

Anime-dub voice actor Vic Mignogna, best known for his work on *Fullmetal Alchemist*, is facing serious claims of sexual harassment and homophobia. He **released a statement earlier this week on Twitter**, responding to accusations of misconduct that started to surface on social media after the premiere of *Dragon Ball Super: Broly*, in which he voices the title character.

In the statement, Mignogna refutes the homophobia allegations outright, stating that some of his dear friends are “members of the LGBTIQ community.” While several fans alleged online that he refused to sign yaoi fan art — often romantic images featuring two male characters — he suggested that he did not want to sign non-canon material in general.

He also disputes a serious claim about his supposed anti-Semitic behavior, arguing that a joke he made about the Holocaust was just a poor choice of words.

Exhibit 2 P. 002

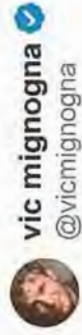
“Someone pointed me to a moment years ago where I was in a panel, and referred to a bunch of noise coming from another room jokingly as ‘a holocaust,’” he said. “As I said then, it was a metaphor ... Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone.”

Finally, he apologized for making fans uncomfortable with physical contact, including unsolicited hugs and kisses. This was among the most common type of allegation that surfaced on Twitter earlier this month, when *Brolly* hit theaters.

“Never in a million years would it be my intent to make anyone feel uncomfortable,” he said. “Rather, [hugging fans] was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels this way.”

Mignogna said he will stop his physical interactions with fans as a result. His full statement can be found below.

1



vic mignogna
@vicmignogna

15.4K 1:45 AM - Jan 21, 2019

5,408 people are talking about this

Many conventiongoers' stories continue to come out on social media, detailing times when the actor acted flirtatiously towards them (**fondling, kissing, groping**, etc.) without their consent, most while they were still underage. While these allegations are only just picking up steam, **many of them go as far back as 2010**.

In addition to the sexual harassment claims, **Mignogna's alleged homophobic behavior** remains a concern with anime fans. While he said that he refused to sign fan art in general, conventiongoers argue that he would only deny signing pictures depicting characters in gay relationships, even if the art wasn't sexually explicit, while he was happy **signing other fan art**. Organizers at conventions, meanwhile, shared stories of unprofessional behavior, such as overstaying **his panel time** and **yelling at staffers**.

As more stories surfaced, the hashtag **#KickVic** started to circulate on Twitter. **Leaked screenshots** reveal that Mignogna took to the Discord for his private fan club, the Riseembool Rangers, last Saturday to encourage his fans to counter the accusations. The hashtag **#ISStandWithVic** rose in response.

When Polygon reached out to Funimation, which distributes *Dragon Ball Super: Broly* and used to license *Fullmetal Alchemist*, the company declined to comment on the allegations.



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Sean

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Jessie Pridemore

January 28 · 🌐

TW Sexual Assault

I've been seeing a lot going around about Vic Mignogna recently. I've kept quiet because I didn't want to ruin my career. I didn't want to not get invited to conventions. But I can't keep quiet about it anymore. I used to have the same opinion as everyone else. "Oh well he's always been nice to me." But after seeing his behavior evolve in front of me over the years and my own assault story, I can't keep it to myself anymore.

About ten years ago, I was a bright eyed and bushy tailed cosplayer at the height of my cosplay career. I was really well known for being the official character model for several anime companies and worked a lot with voice actors for events. I was also a high up staffer at a convention I loved. I was also going through a divorce.

A voice actor (I'm not willing to name because I can't be alone when I do this. He's too powerful in the community) that I really admired and thought was cute was flirting with me. Used my divorce as an "in." Him and another man kept feeding me drinks. Despite another voice actor kicking him in the leg to stop, he kept going. He invited me up to his room to see his "Japanese candy collection." I blacked out. I woke up half off his bed and

undressed just from the waist down. I couldn't even see who's room I was in. I gathered my stuff and left horrified. After talking to a couple people, I pieced together what had happened that night. I was too young to understand what consent was in that situation and thought that he was truly interested in me. I'd give more details, but it would give his identity. So I went to the next convention he did. He spent the entire weekend treating me like garbage. When I finally opened up to my ex husband about what had happened, he told me I was raped. Even then I didn't want to admit it. Over the years, I found there was more girls that it happened to. He started telling people I was obsessed with him and just mad he didn't want to date me.

So the part about Vic. The guy who raped me told everyone at an anime company I regularly worked with that we had fucked and that I was a con slut. He also told Vic. I played nice with Vic a lot because of my position in the community. At this point though, I had seen him be really shitty to people and staffers and knew he wasn't a good person. I ran into him at a con and said hi. We started chatting for a little bit and a couple fans ran up. I went to walk away, but he grabbed my arm and wouldn't let me leave. At one point, one of the fans starts talking about a series that he's in. I said that I actually really liked his role in it. I didn't even realize it was him (making a comment on how all his roles usually sound the same). He turns to me and says, "Oh I know why you like that series." He then slides his hand up through my hair (which was long at the time) on the back of my hair and tugs hard while

Friend Requests See All



Chris Rothfuss
8 mutual friends

Confirm

Delete

Suggested Pages See All



Georgia Debate

Jan and 4 other friends like this.

Like



Missouri State Debate

Jan and 15 other friends like this.

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+

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- Bryan Thompson
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- Cara Kissling
- Darren Elliott
- Doug Dennis 23m
- Steve Pointer 5h
- Yuri Kostun 4h
- Drew Paquin
- Cory A McGuire 5h
- Morris Brossette 5h
- Tracy Gonos 5h
- Scott Strong 4h

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

away. I just didn't even know how to respond. And if that wasn't bad enough HE DID IT A SECOND TIME with the implication that if the other voice actor had "had" me, he could too. I RAN off in tears. Called a friend of mine in said anime company and told him that if Vic ever touched me again, I would kick him in the balls, I didn't care who I was working for.



I know this will probably tarnish me getting invited to cons. It's why I started moving away from working for anime companies. I've become really good at ignoring shitty people over the years. But it is long past time that this comes out to light. Maybe one day I'll be strong enough to name the other one.



 1.6K
  915 Comments
 456 Shares



View previous comments 50 of 402




Janae Elisabeth I believe you. Those guys who need "proof" can GTFO. I "dated" someone who assaulted me after the assault because I didn't understand that what he'd done was assault. Using alcohol to coerce someone into sex is assault. It's stupid that no one taught us that in sex ed.
  19
















 Like · Reply · 19w · Edited
  Andrew Allardyce replied · 16 Replies


Isaiah Bunda Here comes the Incels in 3....2...
  16



Paul Israel Esquer You are loved and cherished. You have always been upfront and personal, and I admire that about you. So when anyone says you are a liar, I grit my teeth, because you have never seemed like someone who needs to lie about anything. Holding back? Sure, it's just part of our social custom. But never fabricating... anything that isn't made from your own hands, at least. Keep holding strong. I'm in your corner.
  2


Corey Parker I don't wanna say it but you should've said no to not drinking a lot that night. Your suppose to be a adult and have a conscious at that point since you were getting divorced at the time and at age of drinking. So what I'm seeing in this story that yo... See More
  21

 Like · Reply · 19w
  Kate K. Alexandra replied · 21 Replies

-  John Havlick
-  Kelly Cox Verra
-  Marnus Van Der Berg
-  Bryan Thompson
-  Nina Vaca-Humrichouse
-  Cara Kissing
-  Darren Elliott
-  Doug Dennis 23m
-  Steve Pointer 5h
-  Yuri Kostun 4h
-  Drew Paquin
-  Cory A McGuire
-  Morris Brossette 5h
-  Tracy Gonos 5h
-  Scott Strong 4h

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 Yuri Kostun 4h
 Drew Paquin
 Cory A McGuire
 Morris Brossette 5h
 Tracy Gonos 5h
 Scott Strong 4h
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assholes, you'll see  8
 Like · Reply · 19w

 Noë Robertson Lemen I hear you. I see you, sister. I believe you.  10
 Like · Reply · 19w

 Susie Yuman Lmfao at people tripping on the text from Tom. Woman have who are raped are usually always predispositioned in society to act as if all is well. After I was date raped I legit told everyone it happened they all shook their heads said "sorry that happene... See More  14
 Like · Reply · 19w

 Sharon Sifton Tim Siltton
 Like · Reply · 19w

 Laurie Clarke I'm "very" thankful for you standing up and giving your #KickVic story to the world. Until the knee-jerk reaction of the majority of people shifts from "why are they being attacked" to "what are the facts?" actions like yours are necessary and *infinite... See More  8
 Like · Reply · 19w

 Shane Freund I'm sorry this happened to you. Vic and that other douchebag should be black balled and put in jail.  7
 Like · Reply · 19w

 Christopher Bunye I definitely believe you, and that this took a great deal of courage to post.  6
 Like · Reply · 19w
 ↳ Randy Nguyen replied · 1 Reply

 Cassandra Blair Lone I am so sorry both about what happened and about the utter trash in the comments. I hope you get your justice. Please, PLEASE file a report, even if you don't think you'll be believed and file a restraining order! A lot of folks WILL stand with you!  7
 Like · Reply · 19w
 ↳ Randy Nguyen replied · 10 Replies

 Richard Anthony That's awful. And their actions hurt your career. You're still doing well, but I bet everything could have been easier and better without all of that.  1
 Like · Reply · 19w · Edited

Like · Reply · 19w

→ Samantha Phi replied · 16 Replies

Kevin Simmons PLEASE READ her statement carefully. She says that the person that raped her told everybody at an anime company, and also told Vic. Vic was NOT the one that raped her. I am seeing people here make statements as if Vic was the one that did it.

Like · Reply · 19w 21

→ Kevin Simmons replied · 2 Replies

Amanda Paddie I may trigger someone, but not everyone can agree. I say, that it was just flat out blackout drunkin' sex. I must point out, the word "black out" was used. Usually, when someone is blacked out, they're still awake and still functioning. Due to being ex... See More

Like · Reply · 19w 8

→ Kirstin Morrell replied · 4 Replies

Nathan Jolly I believe you.

This whole situation is a mess. We may never know the truth about this situation. And I'd be lying if I tried to say I didn't love work by both voice actors. But I believe survivors. And I believe IN survivors.

Like · Reply · 19w 8

→ Amber Finn replied · 18 Replies

Lee W. Benjamin You're doing the right thing. We can't deal with scum if we don't know who they are. 😞

Like · Reply · 19w

Hannah Elise Folke Jay Kiriluk I searched back just to find this story.

Like · Reply · 19w

Ashley Ebanks I'm not invalidating your assault, nor do I disbelieve your claim, and I'm extremely sorry for what happened to you. I've also been in your situation with someone I thought was a friend. But shouldn't you be exposing the name of the person who raped yo... See More

Like · Reply · 19w · Edited 9

Carlos D. Ross My word may mean nothing. I'm just an old time anime reviewer from the late 90s early aughis. I haven't staffed an anime convention in 15 years.

But I absolutely believe you and believe in you.... See More 16

John Havlick

Kelly Cox Verra

Marnus Van Der Berg

Bryan Thompson

Nina Vaca-Humrichouse

Cara Kissling

Darren Elliott

Doug Dennis 23m

Steve Pointer 5h

Yuri Kostun 4h

Drew Paquin

Cory A McGuire

Morris Brossette 5h

Tracy Gonos 5h

Scott Strong 4h

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Miguel A. Hernandez Some of you, instead of quizzing and behaving like villains, should read this article from ANN: 'Far From Perfect': Fans Recount Unwanted Affection from Voice Actor Vic Mignogna

A Twitter thread posted on January 16 accused dub voice actor Vic Mignogna of homophobia, rude behavior, and most conce... See More



Like · Reply · 19w

→ Valerie Havranek replied · 4 Replies

Katie Morison I believe you ❤️ Fuck Vic, he's slowly, finally, getting what he deserves

Like · Reply · 19w

→ Asael Martinez replied · 4 Replies

Autumn Ash FUCKING HELL some of these comments. I am so disgusted with how people are treating you after you poured your heart out and shared such a tragic experience. I am so sorry this happened to you and I 100% believe and support you. #kickvic #droptodd

Like · Reply · 19w

→ Valerie Havranek replied · 5 Replies

Melissa Clarke Legally speaking, having sex with a drunk person is automatically considered rape because the person is considered unable to give consent. You had been drinking and on top of that, he was the one giving you the drinks. You should remember that rape h... See More

Like · Reply · 19w

→ Kirstin Morrell replied · 9 Replies

Timothy Olsen Appropos to nothing, but its nice to see the spirit of FuKu continues on in its past members. Stand strong. To paraphrase a man, "you reap what you sow." Vic has been sowing these seeds for well over 15 years now. Retribution and vindication for his victims is long overdue.

Like · Reply · 19w

→ Timothy Olsen replied · 2 Replies

- John Havlick
 - Kelly Cox Verra
 - Marnus Van Der Berg
 - Bryan Thompson
 - Nina Vaca-Humrichouse
 - Cara Kissling
 - Darren Elliott
 - Doug Dennis
 - Steve Pointer
 - Yuri Kostun
 - Drew Paquin
 - Cory A McGuire
 - Morris Brossette
 - Tracy Gonos
 - Scott Strong
- GROUP CONVERSATIONS
- Create New Group

strong person and I'm in awe of your bravery. Thank you for sharing your story. Sending all my love ❤️

Like · Reply · 19w · Edited 👍👍👍 3

→ Williamy Amill replied · 3 Replies

Casey Hoffman I'm so, so sorry. 🙏🙏🙏 5

Like · Reply · 19w

→ 1 Reply

Slap Pie So to all the everyone on both sides listen up. Twitter IS NOT PROOF. FACTS AND EVIDENCES ARE. Now one side seems to have more of that than the other, and that does say something. If you cant respond with something to counter that that is not evidence ... See More 🔴 1

Like · Reply · 18w

Joey Hollywood Mary Owens

Like · Reply · 18w

Ri Pelmore I believe and support you. I'm so sorry! Jesus... 😭 1

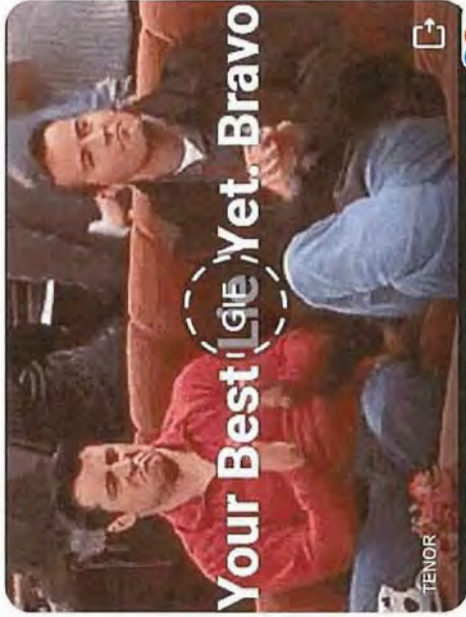
Like · Reply · 18w

→ Williamy Amill replied · 1 Reply

Roscoe Sling Lying thot

Like · Reply · 18w 👍👍👍 10


Alicia Yanguas





👍👍👍 8


- John Havlick
- Kelly Cox Verra
- Marmus Van Der Berg
- Bryan Thompson
- Nina Vaca-Humrichouse
- Cara Kissing
- Darren Elliott
- Doug Dennis 23m
- Steve Pointer 5h
- Yuri Kostun 4h
- Drew Paquin
- Cory A McGuire
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- Tracy Gonos 5h
- Scott Strong 4h
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
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Nate Beal This is bullshit. I have a hard time believing that a guy who is open about his Christianity, genuinely loves people, and tries to accommodate and make his fans happy actually did this. Anyone remember Tana Mongeau? Yea. This girl is a Tana. For those wh... See More
 Like · Reply · 18w · 15

↳  Abbi Carper replied · 7 Replies




Cherno Alpha I think you're right to speak out on this. From my connections in Colorado anime cons, Vic was a huge bastard and this is right up his MO.
 I wish eternal hellfire on anyone who would falsify this kind of claim, but I wanna just throw my 2 cents in he... See More
 Like · Reply · 18w · 2

















Dave Trosko This is stuff I've heard all too often. People knew. Funtimation knew. Nobody did anything for whatever reason. I mean, it's not like this guy was Weinstein with billions, just an anime VA like all the rest of us, nothing to amazing. Just sickens me. I'm sorry to hear yet another story of this monster. Glad the vale has finally been broken.
 Like · Reply · 18w · 4



Jeff Saiyan if it's true then he got what was deserved but if you're lying I hope karma catches up to you in horrible ways
 Like · Reply · 18w · 3
 ↳  Jeff Saiyan replied · 2 Replies


Randy Nguyen <https://m.youtube.com/watch?v=LxWjBner5wo>

 YOUTUBE.COM
Vic Mignogna Case: Meepy Gal Exposed-Everyone Shut Up
 Like · Reply · 18w · 2


Jussi Mattsen So let me get this straight. Someone legit sexually assaulted and drugged you, but you don't name them... but you do name a guy being sleazy?
 Like · Reply · 18w · Edited · 5
 ↳  Kirstin Morrell replied · 2 Replies


-  John Havlick
-  Kelly Cox Verra
-  Marnus Van Der Berg
-  Bryan Thompson
-  Nina Vaca-Humrichouse
-  Cara Kissing
-  Darren Elliott
-  Doug Dennis · 23m
-  Steve Pointer · 5h
-  Yuri Kostun · 4h
-  Drew Paquin
-  Cory A McGuire · 5h
-  Morris Brossette · 5h
-  Tracy Gonos · 5h
-  Scott Strong · 4h

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raped her has spoken about it and the fact they both got drunk and had consensual sex also how they texted each other. So there goes tha... See More


Like · Reply · 17w   10

↳ Jordan Maclean replied · 13 Replies


 **Avi Getter** These accusations against Vic are 100% valid and he DID for sure conduct himself inappropriately with underage people for several years now. There are than a few cases with plenty of evidence to back up the claims. Back in 2013 i went to my first con a... See More


Like · Reply · 17w   8

↳  Ray Fernandez Jr replied · 1 Reply


 **Jake Orton** So you let a guy who raped you go unnamed and you slam Vic for being creepy. You need prioritize. Go file a police report if you haven't.



Like · Reply · 17w   3

↳  Daniel Peterson replied · 5 Replies




 **Tiffany Torres** Oh my God, Jessie, I had no idea. I'm with you Jessie. Fuck, I wish I could call you. I'm fucking horrified and livid that this happened to you. I'm crying. I used to volunteer at AX with the twins. If you remember AX 2010, I have a story for you. I have to DM you bc it's becoming too much for me.

Like · Reply · 17w · Edited   1
















 **Ross Furey** "... Him and another man kept feeding me drinks. Despite another voice actor kicking him in the leg to stop, he kept going. He inviting me up to his room to see his "Japanese candy collection." I blacked out..."

Who was the other man? Would he be able... See More   1


Like · Reply · 17w · Edited

 **Chris Wagner** Jessie, that's so shocking that that happened to you! I remember meeting you for the first time at ACEN '08 in that photog gaggle with Ricky. You should absolutely go to the police, with whatever witnesses and evidence you have, no matter how long ago it was. **NO ONE IS TOO POWERFUL TO BE HELD ACCOUNTABLE.** God bless you!   3

Like · Reply · 16w

-  John Havlick
-  Kelly Cox Verra
-  Marnus Van Der Berg
-  Bryan Thompson
-  Nina Vaca-Humrichouse
-  Cara Kissling
-  Darren Elliott
-  Doug Dennis 23m
-  Steve Pointer 5h
-  Yuri Kostun 4h
-  Drew Paquin
-  Cory A McGuire
-  Morris Brossette 5h
-  Tracy Gonos 5h
-  Scott Strong 4h


GROUP CONVERSATIONS

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you have no evidence or proof to back up any of your claims so therefore you are not a victim. This "believe all victims" mentality is ridiculous. Until real evidence and facts are brought forward that prove he's guilty, hes innocent. Thats how the law works.

Like · Reply · 16w


↳ Alec Peters replied · 7 Replies

 **Greg Rice** Burn him


Like · Reply · 15w

 **David Parker** I believe you. 🙄

Like · Reply · 15w

 **Zachary Khan** I'm sorry this happened to you. No one deserves to go through that.

Like · Reply · 4w
















 **Gabe Nwagbala** Jessie I am so sorry about what happened to you.

Like · Reply · 4w


Write a comment...






-  John Havlick
-  Kelly Cox Verra
-  Marnus Van Der Berg
-  Bryan Thompson
-  Nina Vaca-Humrichouse
-  Cara Kissing
-  Darren Elliott
-  Doug Dennis
-  Steve Pointer
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-  Drew Paquin
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-  Morris Brossette
-  Tracy Gonos
-  Scott Strong

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Interest

'Far From Perfect': Fans Recount Unwanted Affection from Voice Actor Vic Mignogna

posted on 2019-01-30 06:00 EST by Lynzee Loveridge

Every year, hundreds of thousands of anime fans flock to conventions, whether it's their mid-sized local con or planning a trek to Anime Expo. The reasons are just as varied as the attendees: some will spend early morning hours assembling racks and decoration for their artist alley booth, some will perfect their make-up and glue for the *cosplay* masquerade, and others will hop from fan panel to fan panel to learn about dubs lost to time or obscure appearances of hamburgers in anime.



For many, conventions are a weekend of fandom and freedom. Parents can drop off a small group of friends, assured that they'll get their coveted autographs and UFO catcher plushies. It's a place to laugh loudly, be unabashedly nerdy, and interact with the creators and actors in what's assumed as a safe environment. Adults and kids alike are there to check off their "must-sees" but while everyone is running off to the next panel or *cosplay* meet-up, who is making sure the star-struck, awkward teens are engaging with guests appropriately and vice versa? Where is the line for appropriate guest and attendee behavior and what should be done when it's crossed?

These questions came to the forefront of social media these last weeks as rumors about convention guests and staff interactions with minors stopped being whispered and instead were shouted. A Twitter thread posted on January 16 accused *dub voice actor Vic Mignogna* of homophobia, rude behavior, and most concerning, making unwanted physical advances on female con-goers. The thread quickly spread with over 4,000 retweets at the time of this writing and over 400 comments, many relaying their own negative experiences, including unwanted and unsolicited physical affection from the *Fullmetal Alchemist* voice actor. As with any claims involving a person with a moderate fan following, Mignogna's supporters were quick to attempt to discredit individuals' claims or at the very least dispute the *voice actor's* intentions behind kissing or hugging attendees unannounced.

J was approximately 14 years old when she attended New York Comic-Con in 2014 and met Mignogna. She described the encounter as "really, really uncomfortable." She discussed how the voice actor put his hand underneath her zip-up sweatshirt and on her waist for the initial photo. Then, thinking that the photo-taking portion was done, she was surprised when he asked her to look toward the camera again. That's when he put his face close to hers and then kissed her.

妖



DO

REVIEW


**Anothe
Apocal
eBook**

Jun 23, 12:0

 This flesh
 sees its f
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 Silvermar

COLUMN





The Lis Manga

Jun 22, 14:0

When a
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Evangelic
Days!

REVIEW



Kaiju G

Jun 22, 12:3

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COLUMN



ANNCa

Jun 21, 15:0

Zac and I
ocean of
Shin God
Slayer, S
Sarazanr

FEATURE



"Get In

Jun 21, 13:0

Evangelic
it another
the robot,
explains t
hatred fo

REVIEW





J posing with Mignogna in 2014

Multiple individuals, many with friends present to corroborate, relayed their personal encounters with Mignogna with an increasingly common series of events. A fan would be in Mignogna's autograph line to get a piece of merchandise signed for a friend. Upon approaching Mignogna, they would make typical small talk before he would ask the attendee if they wanted a photo. They would agree and would unexpectedly find the voice actor kissing their cheek or pulling them in for a tight hug for the photo op. Time and again, the individuals in the picture said that the physical affection happened without their consent and made them uncomfortable. The behavior wasn't limited to one con, one person, or even one year, and for all intents and purposes seemed like a common occurrence regardless of whether the other party was a young adult or a minor. It was often done in the wide-open areas of conventions and to the cheers of crowds.



Taylor at Colossalcon in 2013

Taylor was 18 when she attended Colossalcon in Sandusky, Ohio in 2013. She was feeling ill when she got up that morning but decided to still tag along with her friend to Mignogna's autograph line. She wasn't an avid fan of Mignogna, but her friend was, so she went so her companion could get a second item signed. When it came to be their turn, Taylor said that Mignogna told her she was "adorable." She didn't think much of the statement and when he asked her if she wanted a photo she thought, "why not?" He embraced her for a photograph and when the moment was over, Taylor said he hugged her and then kissed her on the face. Onlookers cheered. Taylor, who identifies as

Exhibit 4-R-008



Hakata BD/DVD

Jun 21, 12:0

This off-b... a little tim... delivers e... memorat... Silverma...

SURVEY



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queer, reiterated that she felt extremely nauseated and that the entire event feels "gross" when she thinks about it.

No one seemed to be asking, Mignogna included, whether the other party was a willing participant or whether a celebrity should be making an intimate display toward an underage con-goer no matter the intention behind it. The line continued to blur as more individuals came forward, including one person who, at the age of 15, was given Mignogna's personal cellphone number after an encounter in his autograph line.

Azure was 15 years old and presenting as female when he met Mignogna at Anime Expo in 2006 in Anaheim, California. He was in the autograph line with a friend, also 15 years old, who had prepared a gift for Mignogna. Azure was dressed in cosplay, a cardboard version of Alphonse's armor from Fullmetal Alchemist. The two approached Mignogna and Azure's friend joked that Azure's costume was "sexy." Azure was surprised when Mignogna enthusiastically agreed. The group laughed it off and left the line. Later that day, they got an exclusive visit from Mignogna in the hallway. He chatted with the group, asked them how long they were visiting the con, and then mentioned his fanclub. After making the group swear they wouldn't share it, Mignogna gave them his personal cell phone number. Azure wrote it down in his Paris Hilton diary when he arrived home from Anaheim. A reverse phone records search shows that the number Azure provided belonged to Mignogna until at least 2016.



Azure's phone book

He and his friends would share several group phone calls with Mignogna. Azure said at the time that it "felt validating and cool that he was giving us the time of day and attention." According to his account, the friends and Mignogna mostly discussed voice acting and the teens would request him to repeat lines. Similar to the first time Mignogna approached the friends, Azure said he often pushed for them to join his fanclub to the point that Azure became uncomfortable. He also noticed that Mignogna never brought up the group's parents or whether they had permission to be chatting privately with a 45-year-old man.

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Mignogna is in no short supply of fans who believe in him. His fanclub, the Risembool Rangers, is unique among the anime fandom both in its longevity and the lengths its members will go to show their dedication to their favorite voice actor. Founded during the height of *Fullmetal Alchemist*'s popularity in 2005, the Yahoo! Group-turned-Discord channel maintains a full-fledged store run entirely by fanclub volunteers and allegedly "at cost" with inventory, like CDs and signed autographs, provided in part by Mignogna.

Approximately 43% of Risembool Rangers were underage in 2006. Fanclub photos retrieved by Anime News Network show a common pattern by Mignogna of kissing and closely embracing fans for photographs.

The store's responsibilities have been passed down from fanclub member to fanclub member and run entirely on a volunteer basis. One former store manager described her schedule as working her normal job from 3 a.m. to 7 a.m. and attending college courses for 11 hours while managing the fanclub store for a few hours in between classes. She then would ship all the store's orders each Friday. The former manager was reluctant to discuss the store's operations further, but another former Mignogna store manager stated that orders were taken via PayPal and the money went directly to whomever was managing the store at the time to cover their shipping costs.

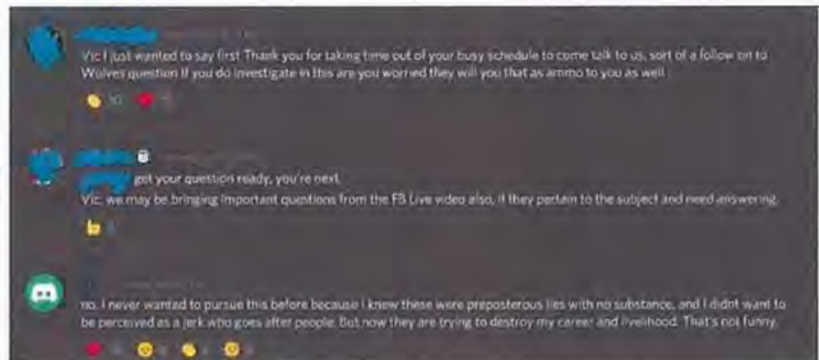
Active members in the fanclub would also volunteer as mods in the forums and busy chatroom, organize con meet-ups for members, and occasionally get to have dinner with the man himself along with other club members. These predominantly young, female members were not compensated for their time running the shop, managing the fanclub's official activities, or moderating the forum and chat. On at least one occasion, Mignogna asked panel audiences if any were members of his fanclub to specifically recruit them to manage his autograph line, CD sales, and till at a convention. That's how one 16-year-old Risembool Ranger ended up working during part of Animazement in 2008.

"With the help of my friends, we sold both his anime songs CD and his Christian CD. We also managed the line and cut it off when it got too long. We counted his money and made sure it matched the number of CDs sold even though we were not a part of the convention staff. Afterwards, we gave him a gift we made which was a sketchbook full of fan art of various characters he voiced and some candy and treats. He was super nice and appreciative during the whole thing. Then, he went around and gave everyone hugs. Some people we knew, but weren't a part of the group, joined in and he thanked them as well for just being fans of his. When he got to me, he gave me a hug as normal but thanked me specifically in an oddly seductive voice and kissed my neck before moving onto other people. Afterwards, I felt so shocked and oddly violated. Because it was such a small convention, I saw him multiple times afterwards, including in an elevator I needed to use. I was so frightened, I took the stairs. I avoided him the entire weekend. He recognized me even in different cosplay and tried to come to me. I ran away every time."

The tried and true Risembool Rangers were on hand to come to Mignogna's aid when allegations of his impropriety came to the surface. When the January 16 Twitter thread picked up steam, Mignogna turned to his fanclub's Discord channel on January 19 to assuage fans before issuing his public statement.



In response to a fan's concerns about who to believe, Mignogna writes: "I am SO FAR from perfect. I've made many mistakes and will make many more. And I'm sure you all would agree that you do too. But all I can ask is that you decide for yourself by coming and meeting me in person, and form your own opinion on facts, not rumors ... many people can have many reasons to make up garbage and slander others."



Mignogna responds to a second question by characterizing the allegations as "preposterous lies with no substance" that could potentially damage his career.

Mignogna also assured his fans that the statements being made wouldn't be seriously considered by others in the business. His claim of course, wasn't entirely baseless. Rumors about Mignogna's alleged behavior toward con-goers and supposed outbursts at fellow voice actors and con staff have been shared within insider circles for over a decade. While researching this article, I kept learning of more conventions that supposedly "blacklisted" Mignogna from ever returning. Yet, any attempts to reach out to long-time staff for each event were met with silence. If the rumors were true, no one with any kind of power in the industry was willing to talk about it.

Anime News Network reached out to Mignogna to comment in hopes of gaining more specifics about the allegations. He declined to comment and instead chose to stand by a statement he issued on January 21 where he mentions the allegations from the January 16 Twitter thread in general.

This is heartbreaking. Over the last few days, a number of comments and allegations have been voiced on social media. I'd like to share my thoughts.

Homophobic? NO! Some of my dearest friends are members of the LGBTQ community, including several that I brought into my production family on Star Trek Continues. This is a blatantly false statement. I said many years ago that I didn't think a particular character I voiced was gay, contrary to what some fans believed, not because it matters to me AT ALL, but because I was told this was the case. I also elected not to autograph Yaoi, not because I am homophobic but because I didn't wish to sign material that was not canon.

Anti-Semitic?? I couldn't even grasp where this was coming from until someone pointed me to a moment years ago where I was in a panel, and referred to a bunch of noise coming from another room jokingly as "a holocaust." As I said then, it was a metaphor for amageddon, death, and mass destruction, but not "THE Holocaust." Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone.

I sincerely apologize to any convention staff member who ever felt I was anything less than kind and grateful to be included in their event. Unknown to most staffers, contractual arrangements made in advance with cons were occasionally not honored when I arrived and that made me frustrated. That does not excuse making anyone feel badly and I am deeply sorry.

I would also like to sincerely apologize to anyone who ever felt my interaction with them (a hug or a kiss on the cheek or forehead) was crossing a line. Never in a million years would it be my intent to make anyone feel uncomfortable. Rather, it was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels the same way. Hence, I will not be interacting in the same way with fans in the future. Understand this is the climate we live in and this is how it has to be. To my fans who ask me for hugs, etc., I'm sorry, but please know that I am no less grateful to or supportive of you!

Finally, any allegations of sexual harassment, sexual assault, or most disturbingly, pedophilia are COMPLETELY AND UTTERLY FALSE. My heart weeps for anyone who endures a violation of this kind, so to be accused of harming others in this way...I have no words.

Sincerely,
-Vic Mignogna

In the statement, Mignogna compares the kissing seen in the above photos to the same kind he shares with family members and says he will no longer engage in such behavior with con-goers. He then apologizes to his fans that he will no longer be able to hug or kiss them if requested. He also denies any allegations of sexual harassment, sexual assault, pedophilia, homophobia, and/or antisemitism.



Regardless of these specific points of contention, discussion of *yaoi* and *yuri* was banned outright from the Risembool Rangers chatroom and forums. The Yahoo! Group's page states: "NO posting adult content! This too is self explanatory [sic]. Vic is a Christian and does not approve of *yaoi*, *yuri*, *hentai*, etc...if you were a fan of Vic, you would know that. We're not saying you must clean up your life because of that, just that it has no place here. End of discussion!"

A Jewish fan of Mignogna's work on *Persona 3* left his autograph line feeling judged in 2010. The 19-year-old lined up with a replica of Junpei's hat for Mignogna to sign and also grabbed a copy of his fan music CD. When their turn came, Mignogna allegedly asked them why they chose the fan music CD but not any of his Christian music CDs. The fan apologized and stated they were Jewish. According to them, Mignogna stared at them up and down and responded by saying, "Well, we can change that."

"I couldn't believe that he would say something like that to me," they said. "I wasn't trying to be rude by telling him my religion, I was just trying to answer his question. I ended up just grabbing the CD and the hat without his signature and apologized to him and just bolted out of the signing line."

One week after issuing his statement, another alleged victim came forward, a fellow talent and TV show contestant.

On January 28, prominent *cosplayer* Jessie Pridemore publicly recounted her own experience with Mignogna at Anime Next in 2011 where the *voice actor* allegedly grabbed her arm to keep her from leaving his side during a convention. Pridemore wrote that fans approached after he allegedly held her arm and they made small talk about a series he had appeared in. During this conversation, Pridemore claims Mignogna slid his hand up her back and through her hair before grabbing and tugging it. In her account, Pridemore wrote that he then insinuated that the reason she enjoyed the series was because of

Exhibit 4 P. 007

another *voice actor's* performance in it, a man Pridemore claims raped her and bragged about it to others in the industry.

When a friend approached to help Pridemore, she wrote that she did not respond because she was stunned. She claimed Mignogna pulled on her hair again "with the implication that if the other *voice actor* had 'had' me, he could too." She said she then left the group in tears.

Prior to Pridemore's post, little of the allegations against Mignogna made their way outside of social media and it's unknown what, if any, ramifications they might have beyond the viral tweet expiration date. He appeared at the premiere of *Funimation's Dragon Ball Super: Broly* film where he voiced the titular Broly. Individuals have tagged *Funimation* while using the hashtag #KickVic on Twitter to relay stories to the company, but any discussion about the actor himself hasn't stopped ticket purchases in the U.S. His convention booking calendar on the Riseembool Rangers' website shows two to three convention appearances per month year round.

Despite the longevity of Mignogna's reputation and numerous first-hand accounts of unwanted physical contact between the *voice actor* and attendees, any kind of repercussions were left to internal memos and insider discussions. Conversations that the attendees manning their Artist Alley booths, *cosplayers* practicing their skills, and gaggles of teenage fans waiting in line for a *Vic Mignogna* autograph would never overhear.

Additional reporting by Bamboo Dong

All the stories included in this article were corroborated by multiple sources with the exception of the Persona 3 fan.





Images were provided by the respective sources, shared via the Riseembool Rangers fan club, or from Vic Mignogna's professional website.

Anime News Network reached out to multiple convention staff and industry staff members, former and current, and voice acting talent but did not receive responses by press time.

If you're a victim of sexual assault and need help, please call RAINN at 800.656.HOPE (4673) to be connected with a trained staff member from a sexual assault service provider in your area. Your call will be confidential. You can also visit the RAINN website for other resources and an online chat.

Update: This article is updated for better clarity and to further protect the identities of the individuals in the photos. A previous version of this article published on January 30 included a photo of a minor being kissed on the cheek by *Vic Mignogna*. The photo and two other photos showing similar behavior were used in the article to illustrate the commonality of such posing by Mignogna with female fans, some underage. *Anime News Network* at no time claimed those photos were examples of non-consent by the subjects. Due to third party mischaracterization of the photos and a request relayed from one individual in the photo, *Anime News Network* removed the fan club photographs on February 4.

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6/24/2019

'Far From Perfect': Fans Recount Unwanted Affection from Voice Actor Vic Mignogna - Interest - Anime News Network

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Fixing the Staircase: Vic Mignogna's Sexual
Assault Allegations and the Voice Actors Who
Speak Out



Vic Mignogna, the voice of Broly in *Dragon Ball Super*, has been accused of sexually assaulting women at anime conventions. In the wake of these allegations a cultural divide has formed that reflects our society as a contrast between #MeToo and #FakeNews.

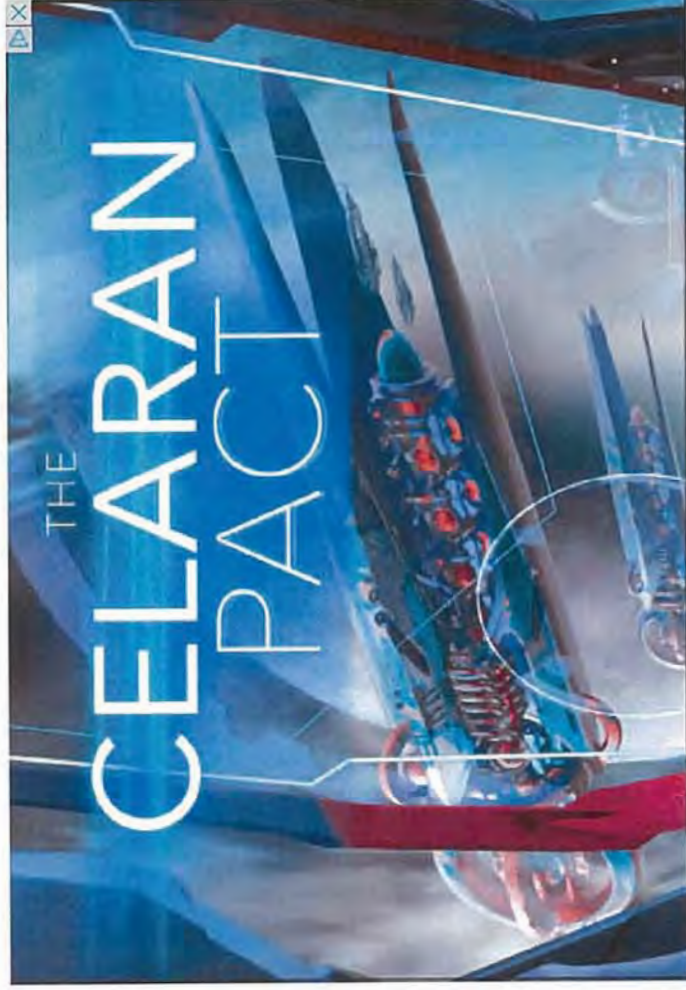
One female victim alleges that around the year 2009 an unnamed voice actor and another man intoxicated her, took her up to their hotel room, and raped her. Afterward, this unnamed voice actor told Vic Mignogna that she was a "con slut," and then at subsequent conventions Vic Mignogna treated her poorly and sexually assaulted her. Yet no criminal charges have been filed and Mignogna denies the allegations.

Such an allegation toward a celebrity may seem like a one-off and hard-to-believe story that perhaps is the cost of being famous. However, numerous allegations of sexual assault have shadowed Mignogna's career and continue up to today. During the research for this article, over 100 independent allegations surfaced, dating back to 2003.

These allegations are affecting Vic Mignogna's career and social life, as conventions are cancelling his appearances and fans are arguing on his social media pages. This comes right after the premiere of the [box-office record-breaking film](https://deadline.com/2019/01/dragon-ball-super-broly-opening-day-domestic-box-office-1202536491/) (<https://deadline.com/2019/01/dragon-ball-super-broly-opening-day-domestic-box-office-1202536491/>), *Dragon Ball Super: Broly*, where Vic plays the titular villain. The poor optics of these allegations may even lead to him losing voice acting roles, including Broly.

Are the allegations true? In this article we'll examine these allegations, hear stories from women who claim to be victims of his assault, talk to Dragon Ball voice actors and industry insiders who have worked with Mignogna, discuss the response from his primary employer FUNimation, analyze fan discussions on both sides of the spectrum, and highlight conventions that book Mignogna as a guest or ban him from attending.

This website's purpose is to record the culture and history of Dragon Ball's development and the way it influences our society. This article's subject is not about Dragon Ball's content as much as it's about the industry at large and the people that work on the series. It serves as a historical record and chronological narrative of the information that is available.



Remember that allegations are not a guarantee of guilt. No judgment is being made, nor intent to libel, and no unspoken intentions of any sort are implied.

Cultural Context

It's important to understand the cultural context that these allegations against Vic Mignogna are arising from. Sexual assault allegations in our society are a hot topic and divisive issue because of social phenomenon like the [#MeToo movement](https://en.wikipedia.org/wiki/Me_Too_movement) (https://en.wikipedia.org/wiki/Me_Too_movement), where countless people who claim to have been sexually assaulted or harassed have come forward to share their story.

Famous examples of the fallout of this movement include the Harvey Weinstein scandal, as reported (<https://www.newyorker.com/news/news-desk/from-aggressive-overtures-to-sexual-assault-harvey-weinsteins-accusers-tell-their-stories>) by Ronan Farrow, who won the 2018 Pulitzer Prize for Public Service for his efforts. Also actor Kevin Spacey (<https://www.usatoday.com/story/life/2017/11/07/kevin-spacey-scandal-complete-list-13-accusers/1835739001/>), comedian Louis C.K. (<https://www.nytimes.com/2017/11/09/arts/television/louis-ck-sexual-misconduct.html>), Bill Cosby (<https://www.latimes.com/entertainment/la-et-bill-cosby-timeline-htmlstory.html>), Michigan State University gymnastics physician Larry Nassar (https://en.wikipedia.org/wiki/Larry_Nassar), and the powerful men (<http://time.com/5015204/harvey-weinstein-scandal/>) on news channels such as Roger Ailes (<https://money.cnn.com/2017/05/18/media/timeline-roger-ailes-last-year/index.html>), Bill O'Reilly (<https://www.nytimes.com/2017/10/21/business/media/bill-oreilly-sexual-harassment.html>), and Matt Lauer (https://en.wikipedia.org/wiki/Matt_Lauer#Sexual_misconduct_allegations), who have had their careers damaged or ended by victims coming forth after years of silence.

The news of these scandals spread around the country from [2017 to 2018](https://www.chicagotribune.com/lifestyles/ct-me-too-timeline-20171208-htmlstory.html) (<https://www.chicagotribune.com/lifestyles/ct-me-too-timeline-20171208-htmlstory.html>) and continued to rise in intensity as more and more victims added fuel to the fire with their stories (<https://metoomvmt.org/>) of frustration, fear, and loneliness. And even with this movement inspiring them to speak out, there was still the anxiety of coming forth because of the backlash of being shunned or mocked for telling their story, or for being designated as 'not smart enough' to avoid the situation that led to them being victimized. And as we discovered, it was rampant in every industry of our society.

Until now there has never been a bombshell report about a man in the anime industry using their fame and influence to manipulate women for sex. But according to recent news, one might be led to believe that Vic Mignogna is such a man.

Vic Mignogna Intro

Vic Mignogna (https://en.wikipedia.org/wiki/Vic_Mignogna) is a 56-year-old voice actor who began acting in 1999, and is most well-known for playing Edward Elric in the English dub of *Fullmetal Alchemist*, released in 2003. The success of this series launched his career into playing hundreds of roles (<https://www.imdb.com/name/nm0586003/>) in anime, cartoons, and live-action. He's also a multi-talented (<https://www.vicsworld.net/>): musician, producer, stage actor, and singer.

This same year he was hired by FUNimation Entertainment, the official licensor of Dragon Ball in the United States and other English-speaking countries, to play the role of Broly in three Dragon Ball Z films starring the character, released from 2003 – 2005.

In the following years he would perform as Broly in each of the dozens of Dragon Ball video games, right up to 2018 with the release of the megahit *Dragon Ball FighterZ*, which sold more than 3.5 million copies

(http://www.pushsquare.com/news/2018/10/dragon_ball_fightez_tops_3_5_million_sales_in_less_than_a_year) in less than a year. So throughout the course of his career, Dragon Ball fans have always associated him with the role of Broly.

But Broly is not where most of Vic's fans come from, and most of Vic's fans are not the typical young male fan of Dragon Ball. But instead, young girls.

Vic Mignogna's Fan Club

Many of the roles that Vic Mignogna plays are in shows catered to girls and children. For example, *Ouran High School Host Club* (2006), *Free! Iwatobi Swim Club* (2015), and *Digimon Adventure Tri* (2015).

Every independent actor has to build their own following through their work and through social media. Vic has created a loyal following through a website dedicated to him called the Risembool Rangers (<https://www.risemboolrangers.com/>). The Risembool Rangers are named after the fictional town of Risembool in *Fullmetal Alchemist*, and it is the hometown of the main character that Vic Mignogna plays.

Fans congregate here to buy his merchandise and to discuss Vic, his work, and Christianity. Vic is an open Christian and will often hold 'Gospel of John' panels at conventions around America, where fans come to hear him read and preach the gospel. He has a music CD where he does the same, played to piano, and he makes it available at conventions. And on his fan club's website he sometimes asks his fans to pray.

It's common for the Risembool Rangers to have a meeting at whatever conventions Vic goes to, as organized through their site and *Facebook* page (<https://www.facebook.com/RisemboolRangers/>). Here he will often give special attention to his Rangers, including hugs, kisses, personal advice, and motivation. It's easy to see why young girls would be attracted to Vic. He voices many characters that are in anime that appeal to girls, he's handsome, has a bright smile, and is supportive of his fan's dreams.

But some people, including former members of the group, consider it to be a cult of personality (<https://www.tumblr.com/search/risembool%20ranger>). For example, in a recruitment video described as the "official promo for the Risembool Rangers" (<https://www.youtube.com/watch?v=AgpZh165X9E>), images of the members and Vic appear alongside text saying, "We have a great and loving leader... We are friends... We are family... Are you ready? Join us..." This video can be viewed as silly fun, or as

something rather strange. Their website even has a page (<https://www.risemboolorangers.com/about-the-fan-club.html>) on it that attempts to convince visitors that they are not a cult.

Another strange factor is the way that he focuses on young girls to be his biggest supporters. According to *Anime News Network* (<https://www.animenewsnetwork.com/interest/2019-01-30/far-from-perfect-fans-recount-unwanted-affection-from-voice-actor-vic-mignogna.142212>), 43% of Risembool Rangers were underage in 2006. This issue is exacerbated by his age, as any 56-year-old who spends so much time interacting with young girls on a website, without parental supervision, and who then embraces and kisses these children at conventions, is going to raise eyebrows, even if it's innocuous.

From what I can tell, there aren't any other clubs like Vic's in the anime community. Every anime fan has a series they enjoy, and some of them become curious about the voices behind the show, follow them on social media, and get to engage with them. Maybe one day they get to meet them at a convention for a signing or panel. But a forum dedicated to talking about one specific actor, their roles, their personality, and their merchandise, with volunteers pouring countless hours into maintaining and moderating it, and that lasts for decades, is unheard of.

There may be a darker side to this fan club, which is how Vic might be taking advantage of his fan's desire to please him and receive validation from him. For example, by putting them to work without pay. *Anime News Network* describes a volunteer thusly: "One former store manager described her schedule as working her normal job from 3 a.m. to 7 a.m. and attending college courses for 11 hours while managing the fan club store for a few hours in between classes. She then would ship all the store's orders each Friday."

Likewise, how at Animazement 2008, in Raleigh, NC, Vic asked members of his club to work for him in an unofficial and unpaid capacity to sell his CDs and manage his lines. And how afterward he said 'thank you' in a reportedly seductive voice to one of those club members, and then kissed her on the neck.

Allegations

Allegations of misconduct or rude behavior have shadowed Mignogna for years. For example, a site was created in 2011 for the explicit purpose of giving a platform for people to complain about him, called [Vic Meggnogna Horror Stories](http://vicmeggnohorrorstories.tumblr.com/) (<http://vicmeggnohorrorstories.tumblr.com/>). It ran for 6 years. Allegations here and elsewhere include treating staff poorly at conventions, being banned from conventions for preaching his Christian faith at panels, kissing underage girls without their approval or request, saying things to minors that are laced with sexual undertones, being homophobic (<https://www.youtube.com/watch?v=8RdHhHkh6Rw&feature=youtu.be&t=4m>) and refusing to sign gay fan art of characters he played, making people feel upset for not being Christian, and being anti-Semitic.

The more research I performed on Vic, the more stories I read from people who claim to have worked at conventions (<https://twitter.com/MarzGurl/status/1087417246798893061>) where he was a nightmare of a guest. Sometimes he'd get banned by the staff, but there were just as many conventions willing to book him and companies willing to hire him. The essential point that each anecdote conveyed was that when the camera is on him, he's one person, and when it's not, he's another.

These rumors continued for years, but it was a Twitter thread on January 16, 2019, which coincides with the premiere of *Dragon Ball Super: Broly* in America that lead to our current situation. Twitter user 'hanleia' wrote (<https://twitter.com/hanleia/status/1085478817764827136>), "Vic Mignogna is a

homophobic rude asshole who has been creepy to underage female fans for over ten years and I've been screaming about this since 2010 but every year nothing changes." It has received over 8,400 Likes, 4,200 Re-Tweets, and 440 replies by the time of this article's publication, and the responses led to more fans sharing their stories on their own accounts.

The numerous people discussing Vic on the eve of the film's premiere and the days after led to people creating the hashtag [#KickVic](https://twitter.com/search?q=%23KickVic&src=tyah) (<https://twitter.com/search?q=%23KickVic&src=tyah>). The goal being to kick Vic out of conventions, out of the anime community, and ultimately out of a job. Like before, they claimed he was homophobic, anti-Semitic, rude to convention staff, and touched people inappropriately.

In response, On January 19, Vic had a two-hour chat session (https://www.facebook.com/pg/RisemboolRangers/photos/?tab=album&album_id=2025842334129717&xts=%5B0%5D=68.ARCkp6eb-fwDFc5fobw3JqIzMYyXiBVwxwgmOX3Vmv9mDPX_4VWcqsHIGIXJgKNolFq1gmnVwWzhguHxijFvQO9z1_9UeRwOxoZLt3l6icWvb93jA1JyUG_wDaHb-tLKuzQH-h_1wUWbJmGWHmTaLkoJ_DtL7CbitWkJHJWGkwOx-X-KeM2buRfjgnMdb6VQpBzA_-eP3tGhrBGPv66dlskoCF5csYBBffgVoMJitEa2AKoE-oVghvH4XUXWChbldg19UYhnm7lqo_uwMiAWZRRpTaRB46rHr1e8wf7yKMGlgEZUq1Hx3tdLfITvgVSVIj9QMN44q6ubzMYf-3IWP1C9HSVQqOcUmryNS7XlJ5-ls4kCLLhHJeJTw&tn=-UC-R) with his fan club members on his Discord channel.

In this chat he said, "These rumors and gossip have been slung around for many many years. None of these outrageous stories are true, and there is not one shred of proof or evidence to support them. ... I have been very open and warm and welcoming to fans for many years, and that includes hugging them, taking pictures and occasionally giving them a kiss on the cheek or forehead. But all of the outrageous stories that keep getting passed around are simply desperate attempts for attention." He adds, "I am NOT homophobic, NOT anti-semitic, NOT a predator of any sort."

He says, "I'll hug 1000 people and 999 will say 'he's so kind and open and friendly with his fans' and 1 will say 'he hugged me too tight and it was creepy.' ... So it appears that I am going to need to revise the way I interact with fans at conventions."

When a fan asked why people are attacking him, he replied, "Because they are sad and lonely. They don't like to see others having fun or enjoying themselves, and feel some sick need to trash anyone who doesn't see things their way."

Vic went on to say that he was going to push back against these allegations after years of "rolling over." "I never wanted to pursue this before because I knew these were preposterous lies with no substance, and I didn't want to be perceived as a jerk who goes

after people. But now they are trying to destroy my career and livelihood. That's not funny."

He then advised his club members to defend him on social media. "Please do whatever you can to counter these lies and negativity. Remember the old saying... 'The only thing necessary for evil to triumph is for good people to do nothing.'"

Following their leader's request, in opposition to #KickVic his fan club members created #IStandWithVic (<https://twitter.com/search?q=%23IStandWithVic%20&src=typd>).

But their posts weren't enough to turn the tide, and the discontent with Vic grew louder.

On January 20, Vic posted a rebuttal (<https://twitter.com/vicmignogna/status/1087239820680880128>) on his Twitter account where he says "This is heartbreaking," and then defends against the main allegations.

He says he is not homophobic because, "Some of my dearest friends are members of the LGBTQ community," and he hired several into a live-action fan-made production of *Star Trek* that Vic produced and starred in. "This is a blatantly false statement."

Regarding anti-Semitism, he says this came from a panel he did years ago where a lot of noise was being made in the room next door and he "jokingly" referred to it as "a holocaust." He says it was a metaphor, and he was not referring to the literal Holocaust. "Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone."

Regarding being rude to convention staff, he apologizes, but says that one time he arrived at a con and the contractual arrangements that had been made before the convention were not honored, and "that made me frustrated. That does not excuse making anyone feel badly and I am deeply sorry."

He also apologizes to anyone he has made feel uncomfortable through his unwanted embraces. "It was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels the same way. Hence, I will not be interacting in the same way with fans in the future."

Each of these statements can be analyzed, and that's exactly what MarzGurl on Twitter did when she posted (<https://twitter.com/MarzGurl/status/1087417226490048515>), a 32-part critical analysis of his rebuttal.

After this, *Polygon* reported (<https://www.polygon.com/2019/1/25/18197827/dragon-ball-super-broly-vic-mignogna-harassment-response>) on this growing issue on January 25. This brought it to the mainstream media's attention.

Jessie Pridemore Speaks Out

Following the surge of people coming out to share their story, on January 28, a cosplayer and photographer named Jessie Pridemore posted (<https://www.facebook.com/jessie.pridemore/posts/10156852278447159>) her own painful experience with Mignogna on her Facebook page. In this post she recounts her experience

of being taken advantage of while drunk at a convention by two unnamed voice actors. She goes so far as to call it rape. Within that story she also accuses Vic of sexually assaulting her by pulling on the back of her hair and insinuating that the only reason she liked a certain anime was because the voice actor who had sex with her was in it. She was so frightened she didn't know what to do, and then ran away in tears.

Jessie said she never spoke out before because of retaliation. "I know this will probably tarnish me getting invited to cons. It's why I started moving away from working for anime companies. I've become really good at ignoring shitty people over the years. But it is long past time that this comes out to light."

The noteworthy thing about her story is that she did not name the people she said raped her, but she did name Vic for making a sexual assault that by any definition is a lesser (albeit equally valid) assault. So by placing the two allegations in the same narrative it leads your mind to associate Vic with the rape, when that's not the case. Not naming the alleged rapist left a lot of unanswered questions, along with the fact there was no supportive evidence for any of the claims.

Despite that, almost all of the commenters supported her and were female, including famous voice actors. They said, "I love you and always support you. Your talent and reputation transcend this." And, "Thank you so much for being so open and honest about this... You are an incredible person and your strength is inspiring." The rest of the comments echoed sentiments of how bad a person Vic is, and how he was, "A creeper and known issue in conventions. ... On a list of 'guests who are to never be invited again.'"

It must be noted that when Jessie was asked for comment for this article-in-progress, she blocked me from her Facebook account.

Following Jessie's statement, *Anime News Network*

(<https://www.animenewsnetwork.com/interest/2019-01-30/far-from-perfect-fans-recount-unwanted-affection-from-voice-actor-vic-mignogna/142212>) followed suit with their own report about these allegations against Vic. It consists of numerous anecdotes and pictures from fans who personally conveyed their experiences with Vic to the writer of the article. They described how they met Vic at a convention, did a photo-op, and were then made to feel uncomfortable or violated by Vic's closeness, unrequested kisses, hugs around the waist, and even a hand underneath their clothes. This led to its own surge of hundreds of comments where fans shared their stories about Vic, many of which corroborated the article, but others which questioned whether this was gossip and even counted as news.

Allegations, Analysis, and Evidence

We need to take a moment to grasp the magnitude of how many allegations there are against Vic Mignogna, and that this situation has continued for such a long period of time. It is self-evident that the powers-that-be and that continue to hire and book Vic are for the most part content with ignoring the allegations, or are unwilling to take specific actions considering that they may be baseless.

However, given the sheer amount of allegations it feels like some are bound to have veracity. The problem is that there's no way to confirm which ones are true or false because there's such little evidence. The only thing that is public record is pictures of Vic hugging and kissing his fans, and being dropped from conventions over the years for various complaints, but the exact reasons for why remain unspoken, or as mere rumors that he is difficult to work with.

In regard to oft-hand allegations, anybody on the Internet can create a social media account or blog and then fabricate a story about a celebrity, and yet it will still be added to the list with the others and absorbed into the social consciousness. From there the

court of public opinion will condemn the actor and their life will be affected. Such false allegations create a detrimental effect on the named celebrity and they weaken the validity of those that are genuine.

Without evidence, how can someone who was sexually assaulted, drugged, or raped, prove it years after the fact? If they didn't take pictures, record audio, or file criminal charges, it's near impossible. Conversely, how can someone accused of such behavior prove they didn't do it? It's more difficult to prove a negative than a positive. As a result, he-said, she-said is the order of the day.



Nonetheless, circumstantial evidence, in enough quantity, can be effective in showing a pattern. It's a technique that prosecutors often use to show the repeat behavior of a suspected criminal. And this large amount of circumstantial evidence is what's at the heart of this story. You either believe it or you don't. So unless someone with enormous clout in the anime industry, who has a good reputation, and has worked with Vic, comes out with direct evidence to prove that Vic did these things, then we'll never know for certain if it's true or false.

Convention Response

Even without definitive proof, following these recent allegations in January, several conventions announced that Vic Mignogna would no longer attend their convention. For example, on January 28, 2019, PlanetComicon, in Kansas City, announced (<https://twitter.com/PlanetComicon/status/1090116322506223617>) that Vic had cancelled his scheduled appearance.

The majority of responses to this announcement were ones of relief and gratitude that Vic would not be there. For example, 'atomic_pixies' said (https://twitter.com/atomic_pixies/status/1090440834393096193), "I've been warned to stay away from him since I was in my teens. I'm 32." They also said (https://twitter.com/atomic_pixies/status/1090120425907150849), "Thank you for listening to your attendees. It's always such a good sign for a con and makes me even happier to attend."

But a few fans expressed dismay at how Vic is being treated, and were disappointed that they would not get to meet him. 'HaleyAngelo_art' said (https://twitter.com/haleyangelo_art/status/10993721056550802), "I'm also sad to see his cancellation. I had a GREAT experience when I met him, as did my niece (on a different occasion) and several friends who have met him at different conventions. He's so down to earth!"

In these responses the fans who support the cancellation presumed that PlanetComicon was appeasing their requests, when actually the staff stated Vic cancelled the appearance at his own volition. The fans said this was just the staff's polite way of saying that Vic has been booted from the con.

Likewise, the Rangerstop and Pop Atlanta convention announced (<https://twitter.com/karanashley/status/1086306910092038148>) on January 18 that Vic would attend their convention, but then fans sent them the allegations and requested to

#KickVic. The staff replied they had not heard of these allegations before and would investigate them. Then on Jan. 28, the staff cancelled (<https://twitter.com/RangerstopConv1/status/1089959255694888961>). Vic's appearance.

This was followed on Jan 30 by Emerald City Comic Con announcing (<https://twitter.com/emeraldcitycon/status/109067852817741824>), "Vic Mignogna's appearance at Emerald City Comic Con has been cancelled."
So it seems like a lot of conventions are cancelling Vic's appearances, and thus hurting Vic financially. But then again, if you look at Vic's official [convention appearance calendar](https://risemboolorangerscalendar.weebly.com/) (<https://risemboolorangerscalendar.weebly.com/>), he still has convention appearances lined up for almost every weekend of 2019.

Timing and Society

Some fans question the timing of these allegations in light of *Dragon Ball Super: Broly's* success. For example, on the [GameFAQs forum](https://gamefaqs.gamespot.com/boards/2000113-dragon-ball-general/774293562) (<https://gamefaqs.gamespot.com/boards/2000113-dragon-ball-general/774293562>), user 'fancystopperman' said, "This #Me Too shit is starting to get to me. Counting these women, this is the 84th girl I've heard this year claim sexual harassment and NOT ONE of them claimed it instantly. They all waited 4 years—decades. I'm not saying they're all fake but at least one of them has to be off base." User 'MrReadman' replied, "I feel the same way. Just by chance some of them are telling the truth, but the timing of this [convention] cancellation (*you know, the big new Broly movie*) leads me to believe that some (not all) are trying to cause controversy." User 'PFM18' called the allegations "FAKE NEWS."

Others question whether hugging and kissing a person is even a problem, and claim, as Vic does, that it's just innocent touching. That may well be true, but most people don't like to be touched by strangers. According to this [2015 study on touching](#)

(<https://www.independent.co.uk/life-style/health-and-families/body-map-shows-where-men-and-women-are-comfortable-being-touched-a6710336.html>), it is a subjective experience. "We may perceive a touch in a particular place from a relative or friend as a comforting gesture, while the same touch from a partner might be more pleasurable, and from a stranger it would be entirely unwelcome." The conclusion being that the only people who can decide if a touch is harmless are those who are touched. And if you're touched without asking for it, and without consent, it can be harmful.

Conventions are a place where fans are star-struck, the celebrities are paid to be friendly, the fans are young, naïve, and inexperienced, and Vic is a charming man who likes to give his fans special attention. So it's easy to understand why so many of Vic's young fans would be surprised by his unexpected touch, or even shocked and mentally harmed.

It's especially questionable giving the amount of sexual assault that occurs in the convention scene. (<https://thegeekanthropologist.com/2015/06/19/the-character-of-sexual-harassment-at-cons/>).

Sexual Assault at Conventions

One of the reasons sexual assault allegations about Vic Mignogna are such a sensitive issue is because sexual assault is a rampant problem at conventions. It is allowed to occur at conventions because the people who put on the conventions don't do enough to resolve it, and the attendees repeat their illicit behavior. This is despite the fact that sexual assault at anime conventions and Western comic-cons is a long-standing and well-known problem (<https://www.bitchmedia.org/post/how-big-a-problem-is-harassment-at-comic-conventions-very-big-survey-sdcc-emerald-city-cosplay-consent>).

In one survey (<https://www.scribd.com/doc/242846454/Sexual-Harassment-Survey-Responses>) of San Diego Comic-Con attendees from 2012, out of 3,600 people surveyed, 59% said they felt sexual harassment was a problem in the comics industry and 25% said they had been sexually harassed. Given that over 390,000 people attend the SDCC each year (<https://www.cnbc.com/2018/10/08/new-york-comic-con-is-bigger-than-ever-brings-more-than-100m-to-nyc.html>), this amounts to tens of thousands of victims. Then consider that this is just a single convention, and hundreds of conventions occur each year across the country. It's likely that this issue is just as prevalent at anime conventions, but I could not find a similar study to confirm it.

Assault issues at conventions include preying on underage girls, taking upskirt pictures, gender harassment (https://medium.com/@hudsonschris35_59553/kinds-of-sexual-harassment-during-anime-conventions-69fc31f2aaf), seductive behavior, sexual bribery, sexual coercion, sexual imposition, drugging, fondling, "creeping" (<https://www.washingtonpost.com/news/morning-mix/wp/2014/07/28/creeping-at-a-consexual-harassment-at-comic-con-not-so-comic/>), "pressuring someone to consume alcohol, rape, and the general manner in which older men prey upon younger women. Of course, it needs to be stated that men are also victims of sexual assault.

It is especially prevalent in the cosplay community, whereby fans dress up in the costumes of their favorite characters. In part, because in the cosplay world, sex sells. For example, the world's most famous cosplayer, Jessica Nigri (https://en.wikipedia.org/wiki/Jessica_Nigri), with over 3.5 million followers on Instagram (<https://www.instagram.com/jessicanigri/>), makes a point of showing off her breasts in her photographs and videos while wearing skimpy costumes. Other aspiring cosplayers emulate this model for success, and in-turn garner fans who are attracted to them for their sexuality. It's not a stretch to say that the perception of female cosplayers as sex objects has become normalized.

In 2014 the issue was so pronounced that a movement was started by 16-bitSirens called "Cosplay Does Not Equal Consent" (<https://web.archive.org/web/20140219092052/http://www.16bitsirens.com/consent/>). The goal was to combat sexual harassment, from "threats of violence to inappropriate touching, and from lewd *Facebook* messages to stalking." They stated, "The consensus is that it isn't safe to be a woman in cosplay." In addition to shaming people who act like creeps, the recommendation for everyone was that, "It is always better to ask a cosplayer for permission." And of course this highlights the message that it is not okay to hug or kiss someone without their permission. Especially underage girls.

In 2016 this helped lead to the creation of a site to combat the issue called the Survivor Support Network (<http://cosplayer-ssn.org/policies.php>), which is, "an inclusive page for members of the cosplay community who are survivors of harassment, trauma, sexual assault, or abuse to find support and comfort." They have a Convention Harassment Policies (<http://cosplayer-ssn.org/policies.php>) page where you can see every convention in America and whether or not they have a policy against harassment and whether they enforce it. Some have a policy but do not enforce it, while many don't have any policy at all. As a result, sometimes harassed attendees don't know how to respond or who to talk

to, or they're so shocked that they freeze up, look around in confusion, and by the time they regain their composure the harasser is gone—so it never gets reported. Only later do they share on social media about what happened.

And in a world where 51% of incidents of rape are committed by repeat offenders (<https://jezebel.com/analysis-of-untested-rape-kits-reveals-serial-rapists-a-1780808012>), not banning one-time offenders from a convention can lead to repeat incidents. The same thing occurs on campus universities (<https://www.nytimes.com/2017/01/24/us/when-campus-rapists-are-repeat-offenders.html>). Predators, narcissists, sociopaths, and psychopaths repeat their strategies to target their prey and deflect from those who attempt to expose them. It is important to recognize their patterns, both for those who have been victimized to come to terms with what occurred, and to help others avoid being victimized in the future. This is as true for celebrities as it is for average fans. Perhaps even more so for celebrities, as they are in a position of power.

Hollywood is ahead of the anime community in its reaction to the #MeToo movement. For example, in the 2018 Cannes Film Festival, pamphlets (<https://www.hollywoodreporter.com/heat-vision/comic-con-metoo-cosplay-community-looks-own-1129134>) were included in each attendee's gift-bag that included a hotline number to report sexual harassment.

Due to the lag in the anime community for authorities to resolve the problems, fans have resorted to policing themselves and raising awareness of harassment. One of the ways they've done this is by boycotting conventions if they invite a certain guest, or entire conventions outright. For example, Boycott Anime Matsuri (<https://www.facebook.com/BoycottMatsuri/>) is a movement to stop people from attending the Houston-based anime convention, in most part due to the Co-Founder John Leigh's alleged harassment of attendees

(<https://www.chron.com/life/article/Houston-s-Anime-Matsuri-festival-draws-12789687.php>). Their movement has had an impact, as many celebrities cancelled their appearances (<https://nerdiarticles.com/2018/03/01/boycott-anime-matsuri-aims-to-highlight-the-sexual-harassment-of-the-anime-conventions-leadership/>). Eventually John Leigh pledged to do better and said, "I sincerely apologize." But for many it wasn't enough and the controversy continues.

Self-policing and movements can be effective, but it's difficult for convention owners to deal with the offenders when they are celebrities because the celebrities are what bring in the money through ticket sales. Conventions used to be about the hobby, but they are now a money-making business first and foremost. Just as in any industry, those with power and influence may use their influence to gain advantage over young, naïve, or fearful individuals for sexual favors. This includes voice actors in anime and video games.

As a result, fans have created a website to report offending celebrities, and a term to brand them by.

Broken Staircase

BrokenStaircase (<http://brokenstaircase.info/>) "is a crowd-sourced directory of alleged predators at US anime conventions." Vic Mignogna is the third entry on the list, in bright red, reading: "sexual misconduct with minors, physical boundary violations, verbal and physical sexual harassment, homophobia, anti-Semitism."

The term Broken Staircase or Missing Stair (<http://pervocracy.blogspot.com/2012/06/missing-stair.html>) refers to a member of a community who is known to cause harm to others and who has to be worked around like a missing stair in a staircase; and then the workaround becomes so normalized that even though people are getting hurt by this person, instead of 'fixing the staircase' they blame victims for not applying the workaround.

The creator of the site says, "Everyone around them knows that there's an issue, but because the problem's been there for such a long time, people have learned to jump over it. The convention community is full of these people due to a common geek social fallacy: that ostracizers are evil and that excluding people is malicious and wrong."

BrokenStaircase was created by an anonymous anime fan as a platform for other fans to report their sexual abusers at conventions without fear of retribution. In an interview with *Kotaku* (<https://kotaku.com/as-spreadsheet-of-accused-abusers-spreads-anime-conven-1831879237>) the creator said, "I just got so tired of seeing so many parallel accounts of the same predators ... I kept seeing people make call-out posts, but if they're being made on *Twitter*, they're just going to vanish into the ether because of time. If they're made on *Facebook*, they're not going to make it outside of a really small circle. The convention community is nationwide."

On the FAQ section of the site the creator says, "A lifetime of abuse watched by bystanders plus an assault last year by a rapist in the convention scene have given me strong opinions on the consequences of silence." They said on *Kotaku*, "I know we all want to be accepting because the reason we're together as a community is because we're rejected for our interests in other spheres of society. ... But at the same time, there are people who are just not safe."

On this site, anybody can make an anonymous claim against a celebrity in the anime community, and then their name will be added to the list after being reviewed by the moderator. This system protects the victim from being targeted, but it could be prone to abuse. So the way it works is that, "People accused by multiple sources will be highlighted in red. Reports made with no associated documentation will be in grey. Take everything with a grain of salt." The creator says, "I'm not interested in punishing these

people. ... Conventions can punish. Law enforcement can punish. ... I am here to equip people who are likely to be victimized to arm themselves and be suspicious because fear keeps us safe in these situations."

In reading through the [list](https://docs.google.com/spreadsheets/d/1hLrK_3LtiqL7atYAfwi1k-WSvNQeiRhGoWT7uTLA/edit?usp=sharing) (https://docs.google.com/spreadsheets/d/1hLrK_3LtiqL7atYAfwi1k-WSvNQeiRhGoWT7uTLA/edit?usp=sharing) of alleged offenders I was surprised to see another Dragon Ball voice actor's name: Todd Haberkorn, the voice of Jaco the Galactic Patrolman in *Dragon Ball Super*. Todd's entry reads: "providing alcohol to someone under 21, inappropriate comments about body, invited attendees to sleep in hotel room." The [linked statement](https://colossal-guest-2011.tumblr.com/) (<https://colossal-guest-2011.tumblr.com/>) says this incident occurred at Colossalcon 2011, in Sandusky, Ohio.

BrokenStaircase's existence is a symptom of a much larger problem. While this site may serve a beneficial purpose, it can also be considered a blacklist of actors not to interact with, and in-turn, a list of people for companies not to hire. This can damage that person's career, and with voice actors in particular, who are self-employed individuals, it can amount to decades of work going down the drain. The fact that anybody can post anything they want about someone, and then it's open to subjective opinion, should be frightening to every celebrity out there. And maybe that's the point: To hold these people accountable when the system fails to do so.

Voice Actors Are Not Perfect

It may be difficult to view voice actors as fallible creatures who make mistakes or have a history of purposeful abusive behavior. I suspect it's because we hear their voices so often that we become familiar with them in an emotional and idealized way. Oftentimes this emotion is comforting, uplifting, inspirational, funny, or nostalgic, and we associate their voice with this feeling.

It's especially difficult if they do things for the community, inspire their fans, or help others on a personal level. We say, 'They couldn't have done this bad thing here because look at all the good they've done over there.' Likewise, if you've had a positive experience with a celebrity at a convention, you might make the false assumption that somebody else could never have a negative experience with them.

For a counterpoint to this argument, a lot of people thought Bill Cosby was a kind old man who made millions of people laugh every week on *The Cosby Show*, and we giggled at his silly commercials for Jell-O Pudding, but then it turned out he raped dozens of women (https://en.wikipedia.org/wiki/Bill_Cosby_sexual_assault_cases) through drug-facilitated sexual assault. Cosby was convicted (<https://www.nytimes.com/2018/04/25/arts/television/bill-cosby-sexual-assault-allegations-timeline.html>) in 2018 of three counts of aggravated indecent assault after 60 women came forward to accuse him, years after their assault occurred.

It's also common for fans to admit that yes, perhaps the celebrity has some quirks, but it is the victim's fault for not realizing this and treating the actor with the proper care. They say, 'You shouldn't have dressed like that.' 'You shouldn't have drank so much.' Or, 'You shouldn't have gone up to their room.' This shifts the blame to the victim. Hence, the need for the Broken Staircase label.

The Comics Alliance

(<https://web.archive.org/web/20160129185129/http://comicsalliance.com/sexual-harassment-women-in-comics/>), posed the question, "Which one of these statements makes more sense to say: 'These people need to find more ways to stop people from harming them.' OR: 'These people should stop causing harm.' If you ever find yourself saying the former instead of the latter, take a moment and ask yourself why." The

Missing Stair entry (https://en.wikipedia.org/wiki/Missing_stair) on *Wikipedia* states, "the problem is the missing stair (the predator) and the solution is fixing the stair (stopping the predatory behavior)."

So with all of these allegations about Vic Mignogna floating around, what has one of his biggest employers done about it?

FUNimation's Response

FUNimation has hired Vic to perform as Broly for the last 16 years. Allegations against Vic have been well-known in the industry for 16 years. FUNimation has known about these allegations, yet continued to hire him. Fans are upset by this, and that's why the *Twitter* post on the night of *Dragon Ball Super: Broly's* premiere went viral.

FUNimation has been contacted for comments on sensitive issues before, including executives, producers, and social media managers, but they have never responded. This time it seemed better to ask former FUNimation employees to comment, thinking that they'd be able to open up. But no, they did not respond. Similarly, when *Polygon* published their article on Mignogna, they wrote, "When *Polygon* reached out to FUNimation ... the company declined to comment on the allegations."

FUNimation has never stated their private business decisions for why they continue to hire Vic in the face of so many allegations, so for the time being one can only surmise.

From a legal standpoint the allegations against Vic have not resulted in criminal charges or provided direct evidence of guilt. So firing Vic because of these allegations, no matter how numerous, may have produced legal repercussions against FUNimation. Even if FUNimation provided a detailed explanation for their rationale behind the decision, it would still leave questions that may never receive answers.

From a business perspective, fans expect Vic to reprise his role as Broly because they associate him with the character. Replacing him may result in backlash by fans against FUNimation, against the new voice actor, and result in reduced ticket sales, which would upset those who are invested in the company.

Furthermore, it would tarnish the company's image, bring trouble to the cast and crew of each series he's been involved with, and blight everyone in the industry who has worked with Vic, yet said nothing and did nothing.

There's also the moral question of ruining a man's career because of allegations that cannot be proven.

FUNimation has, however, taken action with similar incidents in the past. For example, in 2015, voice actor Scott Freeman was convicted to 3 years of prison for possession of child pornography (<https://www.animenewsnetwork.com/news/2015-09-06/voice-actor-scott-freeman-convicted-of-possession-of-child-pornography-92346>). FUNimation stated, "In May of 2015, FUNimation became aware of the legal matter involving Scott Freeman, at which time we suspended our relationship with Scott. In the wake of recent news, we have permanently ended the relationship." So in a situation where there is direct evidence of criminal conduct and actual conviction, FUNimation severs their ties with an actor.

But in regard to Vic Mignogna, on the surface it seems they've done nothing. However, it's likely that FUNimation and their parent company Sony Pictures are conducting an internal investigation into these allegations about Vic. The results and subsequent response remain to be seen.

Is it possible that Vic Mignogna will be replaced as the voice actor for Broly, or soft-banned from voice acting entirely by the industry? If so, what would that mean for Vic, for the fans, and for the series he's been involved with moving forward? What would it mean for the industry at large? Will people take notice? Will it spark change?

Dragon Ball Voice Actors Weigh-In

What do those who have worked with Vic think about these allegations? Five Dragon Ball voice actors and professionals in the anime industry that have worked with Vic were asked to weigh-in.

One of them was Adam Sheehan, a former Senior Marketing Manager at FUNimation. He did not respond to an initial email before publication, but his name will be important later in this story. Of the rest, only two voice actors responded, and one of them requested they remain anonymous. It can be presumed the others don't want their name associated with this scandal.

One who did not mind speaking candidly is Kara Edwards, the voice of Videl in *Dragon Ball Super*. She said: "I do believe Jessie, as in my experience very few victims make their stories up. I will say I have never been assaulted by any voice actor or person in the business. Have I seen or experienced inappropriate actions? Of course. Until recently, that was part of being a woman in any industry. And I'm glad to see things changing."

Another voice actor in the industry, [Jamie McGonnigal](https://en.wikipedia.org/wiki/Jamie_McGonnigal) (<https://twitter.com/McBenefit/status/109006620057695744>), "I've been a voice actor for 20 years. I've known Vic Mignogna for most of that. I'd heard stories of him preying on particularly younger women & girls & I've seen his behavior up close. Now dozens of courageous women are sharing their experiences. We must listen to them. #KickVic. We need to be better. As a community, an industry, a world. We need to listen to survivors. What does it say to our daughters & sons when we say to "Prove it." and "We don't believe you"? It says no one will believe you. And it says go ahead and do what you want. We need to stop."

Todd Haberkorn Speaks Out

Jessie Pridemore did not name her alleged rapist at the convention circa 2009. However, in the comment section of her post she did say, "6 out of 7 women who messaged me about the unnamed voice actor have been correct." More people tried to guess, but she explained that she did not want to come out and name him because, "I can't be alone when I do this. He's too powerful in the community." As time went on, people on *Twitter* started to accuse Todd Haberkorn of being the unnamed rapist.

At 1:30 EST, January 31, voice actor Todd Haberkorn made a [statement](https://www.facebook.com/todd.haberkorn.75/posts/10217214343366123) (<https://www.facebook.com/todd.haberkorn.75/posts/10217214343366123>) on his *Facebook* account where he claims that he is the one who had sex with Jessie Pridemore in 2009, but that he did not rape her.

In Todd's post he recalls the particular details of the events that Jessie referred to. He says that he was a guest at a convention with a friend named Adam, and that a "very close friend" of Adam's would be at the convention's weekend party for the guests. So he meets up with this friend (Jessie), and the three of them have drinks at the open bar. They flirt with one another, continue drinking, and then proceed to their hotel room, "where we engaged in consensual, adult intimacy: sex." He says that the following morning, the two of them woke up early at around 5 to 6 am, and "left the hotel room together – she went her way and I went mine."

So Todd states they had consensual sex between two adults. Alcohol was involved, and he acknowledges this as a factor, but argue the two both wanted to have sex and they left on amicable terms.

He says, "A week later, this young woman contacted me and we began chatting; getting to know each other a bit more. She mentioned that she was glad Adam had introduced us." Todd provides images with his post as visual evidence of the two of them chatting in casual conversation. Todd says Jessie suggested that they become sex buddies at conventions throughout the country, having sex whenever they happened to meet up.

But Todd says that he declined the offer because he was going through a divorce, and through their conversations, "I saw that she had some issues that I didn't feel equipped to take on given my own circumstances." Later, he says Jessie made the offer again. "After that, we lost touch but roamed in similar circuits on the con scene. If we happened to cross paths, things were pleasant and polite."

He adds, "As a sexual abuse victim myself, I'm incredibly sensitive to anyone's experiences with abuse in this realm. ... But I also know that I am 50% of the equation and have just as much right to share my side of the story as well."

Todd finishes the post with his own hashtag: "[#Truth4Todd](https://twitter.com/search?q=%23truth4todd&src=tyah) (<https://twitter.com/search?q=%23truth4todd&src=tyah>)."

This post generated hundreds of comments and shares. Most sided with Todd and thanked him for coming forward to counter the allegedly fake allegations. "I am so glad that you had the courage to come out and share this. Lying about rape is wrong, just as much as raping is wrong. Thank you for pointing out the truth." "Seems a lot of females who feel slighted like to become drama queens and purposefully try and make their hook-ups into something they're not in order to gain attention and make the man look bad." And, "People are more willing to destroy a man's career or life before they would consider that a woman might not be stating the truth."

Others were confused by it. Especially with how it contradicted Jessie's earlier allegations. They wondered if it counts as rape if both people are drunk. And if so, who raped whom? But above all else, why Todd would want to name himself prior to Jessie naming him. Did he feel that it would be best to get ahead of the story in order to frame it with his own narrative? Or was it because he felt maligned by these allegations and needed to defend himself?

In any case, the differentiator between the two stories is that Todd provided evidence of their conversations after the incident. This lends more credence to the rebuttal than to the allegation. Because you have to ask yourself, why would a woman who claimed that she was raped, then proceed to sexually proposition her rapist, flirt with him, and remain friends while hoping to be sexual partners with no strings attached?

From what can be observed from their contradicting claims, it seems like it was a night where two lonely and hurt people got drunk and made each other feel better for an evening. This happens all the time. Where the problems begin is when that experience gets defined as rape. And on the one side, Todd's fans think he did the right thing by exposing the supposedly false narrative of a woman who claimed rape. On the other side, Jessie's supporters continue to believe her claims that she was taken advantage of, and feel it was scummy for Todd to contradict her and publish private conversations.

A divisive contrast of #MeToo versus #FakeNews.

Adam Sheehan Speaks Out

Later that same day, at 5:48 pm, EST, former Senior Marketing Manager at FUNimation Adam Sheehan posted (<https://twitter.com/neumaverick/status/1091106085006524416>) a 16-part rebuttal to Todd Haberkorn's original rebuttal on his *Twitter* account.

Even though Adam's last name was not mentioned in Todd's statement, he comes forth as the one being mentioned. Adam says, "He decided to include me in this response so I wanted to help add to the narrative." In this rebuttal he questions why Todd would come out at all. Also, "I've known Todd for many years and like most people he's a mix of good and bad. I've been friends with other VAs that we all thought were good guys and shocked to find out they were very much not that after all."

Just as Todd did with Jessie, Adam shares images of private conversations between himself and Todd about Vic Mignogna. Their discussions indicate that sexual assault allegations surrounding Vic Mignogna were an open secret within the voice acting industry.

He then describes his own recollection of the party. He says, "Jessie was repeatedly given more to drink, again and again. Someone should have stopped people from giving her drinks. Someone should have stopped her leaving with Todd later that night to go back to his room.... That someone should have been me and a few others. ... It doesn't matter the excuse, I didn't help. I was a bad friend that night."

He states that both Jessie and Todd are good friends, as Todd taught his daughter theater and Jessie was the photographer at his wedding. So it's not about loyalty. "This is about Todd jumping on Jessie's very brave post about Vic when he wasn't named in it to save his own skin."

Adam questions Todd's intentions. He wonders, if Todd's so sensitive to people's experiences with abuse, then why put out this statement while Jessie is going through such turmoil for speaking up about Vic? Why not take this moment to speak up about Vic, or about his own abuse? "I know Todd is not a Vic fan so this could have been a moment to step up and publicly address things he's seen. But he did not. Instead he went after Jessie. Easy target."

He then adds his own hashtags to the mix: [#BelieveSurvivors](https://twitter.com/search?q=%23BelieveSurvivors&src=typp) (<https://twitter.com/search?q=%23BelieveSurvivors&src=typp>), [#HaberWTF](https://twitter.com/search?q=%23HaberWTF&src=typp) (<https://twitter.com/search?q=%23HaberWTF&src=typp>).

Commenters appreciated the added context and balance, but were just as divided. A woman said, "This adds way more transparency and fortifies my stance to believe Jessie. You may not think you were a good friend that night but you are certainly being one

now." A man said, "God I hate this #MeToo movement bullshit. I'll always support Todd! Looking forward to seeing him at cons this year."

Conclusion

Ultimately, all of these issues became public because the problems with these celebrities and within the anime industry were not addressed years ago, quietly, and in private.

Multiple people who are in a position of authority at major companies, voice acting studios, and at conventions have heard these allegations about Vic Mignogna for years, and yet chose to do nothing about them. So then when Vic is cast once more as Broly in *Dragon Ball Super: Broly*, and it becomes one of the most successful anime films of all time, a limelight is cast on Vic and his years of sexual assault allegations. This causes fans to speak up about Vic, which leads to Jessie Pridemore accusing someone of raping her and tying Vic into the story. This draws attention to her story, and also to this unnamed alleged rapist. People start guessing that it's Todd Haberkorn and this makes Todd come out with a rebuttal, where in the process he names Adam. So then Adam comes out with his own rebuttal, and the entire can of worms explodes in our faces!

This is where we're at, so let's take a moment to think about this complicated situation.

The allegations against Vic Mignogna have not been proven. But logic dictates that if hundreds of people across a span of 16 years come forward to share their stories of how they were sexually assaulted or offended by the same man, and none of these people know one another, then there is likely some truth to their claims. A normal employee in any industry would not be receiving assault allegations over a span of decades if there weren't something fishy going on. Likewise, if colleagues of this man are aware of these allegations and talk about it amongst themselves as if it's an accepted fact, then maybe that really is the case. But without evidence, what should be done?

In some cases it may be necessary to throw a Broken Staircase out of a group because the harm they cause is too severe and they have already been given enough opportunities to change. In other cases, they may be able to make amends and alter their behavior. At the very least, we need to recognize them. Tolerating the perpetrators to such a degree that it enables them to continue doing heinous acts needs to end. Look to the [Catholic Church sexual abuse cases](https://en.wikipedia.org/wiki/Catholic_Church_sexual_abuse_cases) (https://en.wikipedia.org/wiki/Catholic_Church_sexual_abuse_cases), involving priests and thousands of underage boys to see how ignoring the problem, or arguing that it's too embarrassing to address, can enable it and make it worse.

What's the worst that can happen with keeping a Broken Staircase in place?

Sexual assault.

With Vic in particular there has been no definitive evidence to convict him. This divides people, and they say, 'He's finally getting what he deserves!' Or 'Our society is condemning an innocent man!'

But how are we supposed to know the truth if the people on the inside won't allow the truth to come out? Don't people deserve to know who they're dealing with? Who they're giving their money to? And to be protected from harm? We're left to wonder, 'How many Broken Staircases are out there?'

There's more that can be said, but what's here is enough food for thought. What was discussed is a symptom of bigger problems. Vic is just one more example in a long line of lessons. But at what point will the entire Staircase collapse? And will the repairman ever fix it?

As Vic once stated: "The only thing necessary for evil to triumph is for good people to do nothing."

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About Derek Padula

[Derek Padula](https://thedaooofdragonball.com/about/) (<https://thedaooofdragonball.com/about/>) is the author of *The Dao of Dragon Ball* and "It's Over 9,000!" (<http://thedaooofdragonball.com/books>) Connect with Derek on [Twitter](https://www.twitter.com/DerekPadula) (<https://www.twitter.com/DerekPadula>), [YouTube](https://www.youtube.com/channel/UCFo-a4tHSWeY5nkzSJJcpgg) (<https://www.youtube.com/channel/UCFo-a4tHSWeY5nkzSJJcpgg>) and [Facebook](https://www.facebook.com/pages/The-Dao-of-Dragon-Ball/291746590854799) (<https://www.facebook.com/pages/The-Dao-of-Dragon-Ball/291746590854799>). Goku inspires him to rise higher!



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
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Name

 **Jacob Bucklelew** · 5 months ago

Incredible write up. I absolutely believe women's safety is important and abusers should be heavily punished. But that is exactly why we need to slow down and think over things carefully. There's a lot of people who think that it is more appropriate to do the opposite and it's incredibly toxic. It does more harm than good for whoever or whatever agenda they speak for. Anyone that claims to be a rape survivor better not be dealing with half truths or falsehoods and such people should be dealt with accordingly or we risk great injustices both socially, psychological, and professionally on either side of accusations in the present and in the future.

6 ^ v · Reply · Share ›

 **mena** · 5 months ago

So, all of this has been known for years, and no one from the industry came together to confront Vic about his overly touchy behavior with fans and force him to stop? No one lectured to him how a grown man shouldn't get so close to fans and how it may be perceived? Do these industry people not realize that if Vic falls, they all fall with him? This type of behavior jeopardizes everyone's paycheck. You have fans that would refuse to watch a show unless certain voice actors are reprising the role. I feel as if all the people that were working with Vic just ignored the behavior because they felt it didn't involve them directly. It's all about to come crashing down now. They're all gonna wish they nipped it in the bud years ago. Too late now.

You anime industry people better learn to stick together and check each others behaviors instead of all of this Twitter bickering and hatred amongst each other. Vic, Todd, who's next? Watching them all throw each other under the bus is interesting. This Broly movie has gotten the attention of the "big wigs" and they would probably love to see it all crash and burn. I also find it interesting that Schemmel would waste his time on Twitter liking kickvic tweets and blocking Vale instead of using his clout as the voice of Goku to gather the entire DB crew together and hold an intervention with Vic. It's not his responsibility you say, but when conventions start banning the entire DB cast, they will finally get it. You already have people tweeting bandragonball. Guilt by association is real. I wonder what Sony will do. Will they stop the hemorrhaging or exacerbate it to teach everyone a lesson? There is a ton of money at stake and I don't see this ending well.

12 ^ v · Reply · Share ›

14:11 · Reply · Share ↗



John titor → mena · 4 months ago

Maybe they did and he just didn't stop.

2 ^ v · Reply · Share ↗



GokuSS400 · 4 months ago

Look, my HONEST reaction here is that first and foremost....this should NOT continue as "Trial by Social Media" or "Twitter investigates" or any of that stuff.

Look, if you think you were raped or you think someone went too far with you....REPORT IT TO THE AUTHORITIES. TELL THE POLICE.

These allegations and such SHOULD ABSOLUTELY be handled IN A COURT OF LAW. Where the only thing that matters is the FACTS.

Let the Police/FBI whatever investigative authority....DO THEIR JOBS AND INVESTIGATE THIS STUFF, determine whether a crime was committed, and then forward that to the office of the Prosecutor to determine whether charges are warranted or not.

7 ^ v · Reply · Share ↗



Teal-Rose Jaques → GokuSS400 · 3 months ago

except how those things are handled by authorities isn't all that great... A lot of the time it isn't taken seriously or is simply dismissed, especially if you don't have physical evidence. So if he isn't actually out there raping people, what evidence do they have? Just what is caught on camera here or there, where he is typically on his best behavior.

If you look to some of the photos with attached stories in the article they linked above (the anime news network one), you can see some HAVE tried to submit it, at least online or to con staff. I don't doubt some DID report it but, again, unless caught in the act or with some form of physical evidence, the people get dismissed. Even this article said, by the very nature of it, it ends up being he said/she said. This ignoring how often people are dismissed or poorly handled even WITH proof (Just one example: <https://www.king5.com/artic....>)

On top of that, if you work in that industry, in any real capacity, making such an accusation can get you yourself blacklisted even if it was true. We have seen it with others even Coshir's animeare felt the backlash

11/15/2021, 10:00:00 AM

It isn't a great system, even if it is improving. More ARE being directly reported as people see they are being taken more seriously. But too many years of 'well, what did you expect wearing that/drinking that much/being in this area?' and similar have led people to feel powerless. ESPECIALLY if they are accusing someone in a position of power while not being in one themselves.

2 ^ v • Reply • Share >



noneedtoknow → GokuSS400 • 3 months ago

Can't happen when it's the internet. You are trusting people to actually talk in front of a court when they have a hard time writing a sentence in the comments section of a video. That and victims are usually the losers in these cases. Whether it's a male or a female.

^ v • Reply • Share >



Teal-Rose Jaques → noneedtoknow • 3 months ago

Wow, you're quite the ass aren't you? Shown by their own recounting above and in the linked articles, they are just fine at "writing a sentence". The victims seem to range all kinds of people, and while I don't know your definition of "losers", I am sure not all of them fit it. From colleagues to cosplayers to fans to con staff. There have been accusations spanning the lot of them.

1 ^ v • Reply • Share >

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Montclair · 5 months ago

I only know of Vic and Todd through Star Trek Continues. It's unfortunate to see both of these guys involved in this type of controversy. While I do condemn anyone who actually behaves as the allegations claim, we do have a standard of innocence until proven otherwise in this country. We just can't abandon that, no matter how vile the allegations may be. On that basis alone, I raise my hand in support of these guys until it's been proven otherwise.

7 ^ v · Reply · Share >

Bruno → Montclair · 4 months ago

Agreed. Allegations nor emotional falsehood stories should never be used as actual evidence for political gain.

4 ^ v · Reply · Share >

Erin → Montclair · 4 months ago

I agree.

1 ^ v · Reply · Share >

Yuki Tachibana · 4 months ago · edited

I'm gonna need a bit more than hugs and kisses to consider it assault tho. No offense to anyone who thinks that's assault but, just no. Maybe it's because where I'm from, culturally speaking, we greet people that way, so it's not a big deal for us. Not only that, but this isn't just some random guy hugging strangers, this is a dude hugging and kissing his fans on the cheek. I don't really see a problem with it.

The rape allegation seems to be filled with holes now, to me it looks like Pridemore has a vendetta against him and decided to bring up something and call it rape, when in reality it was consensual. She can say all she wants that her keeping in touch with her supposed rapist for years and still hooking up (in a sexual meaning) was just her being confused after being raped but yeah no. I'm just calling bullshit. I also see that she was being fed drink after drink etc, and to this I have to say... This type of wording is trying to paint a negative light from the get go, so I would be very careful with it. Especially considering how long ago it was. We have literally no way of verifying whether or not she's drinking like that because they're just socially drinking and that's normal, or if someone was purposefully getting her drunk to rape her

Let's be honest now. If fucking a girl while drunk (both parties), is now considered rape, half of American men that go to bars would be in jail. Fuck, I wouldn't be surprised if that's how some of your parents met. Consensual sex between 2 drunk parties is a thing, sorry.

6 ^ v · Reply · Share ›



Brendan Ledwith → Yuki Tachibana · 4 months ago

. If fucking a girl while drunk (both parties), is now considered rape, half of American men that go to bars would be in jail.

It's been rape for years and years in many places. The logic is simple: when under the effects of alcohol, you're in an altered mental state that decreases much of your ability to function and make sound judgements. As such, you are no longer considered to have the ability to consent.

2 ^ v · Reply · Share ›



Yuki Tachibana → Brendan Ledwith · 4 months ago

Yeah...but both parties are drunk, so why is it that 1 party specifically is the one that has to go to jail?? Doesn't seem very equal to me.

2 ^ v · Reply · Share ›

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Tony Tony Chopper → Yuki Tachibana · 2 months ago

the thing is with stuff like Me Too, there are a lot of girls know who are attention whores and will make shit up if they see something online about some famous guy that they briefly hugged. quite often, these girls will talk about it bein their dream to go and meet this person and mabey a hug and kiss if its allowed by the famous person they are meeting. and they will make up dates and places as long as it sounds reasonable. dont take this the wrong way, I de know that lots of stuff in that kind of chain is true, but this is what I have learned from people around me (that I am not particularly close with). the type of girl that does what I talked about above are, sadly, very common amongst girls that are around the age of lots of the girls in his fan club.

^ v · Reply · Share ›

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Poosmith · 4 months ago

One thing that I am VERY confused about is Jessie allegations.. she said she was raped and wouldn't name who it was.. but she somehow TRIES to tie Vic into the whole mess.. when in reality it was Todd.. and then Adam tries to help Jessie by saying this and that about both Todd and Jessie... but the question I have is.. HOW DOES THAT RELATE TO VIC?! Sure showing proof of texts about "knowing" some of the allegations circulating is one thing.. but there is a BIG problem with that being "proof". It all bubbles down to more 'he said she said' stuff.. they are just allegations in the end.. and to me the REAL problem of these allegations is that Jessie tried to relate her rape allegations to Vic, when it was actually Todd.. she tried to push a narrative that Vic was the villain and people are just accepting this? And I know they also said stuff in the text about how Vic can be such a Diva to con staffers.. but how the hell does that relate to anything that is going on with his sexual harassment case? Nani da fuck?!

3 ^ v · Reply · Share >



Bruno → Poosmith · 4 months ago

Exactly Jessie allegations makes no sense. Unless of course maybe Jessie and others are protecting Todd whom might not be an white actor?

2 ^ v · Reply · Share >



David Blau · 5 months ago

Not taking sides here, but hundreds or thousands of people have been claiming for decades that aliens landed at Roswell in 1947. Very specific allegations. Doesn't make it true. Point is, evaluating claims with little hard evidence is difficult and prone to dangerous assumptions.

There's no doubt that sexual assault is a problem, and that it's under-reported. We just need more people to come forward with corroborating evidence.

6 ^ v · Reply · Share >



Corfish1001 → David Blau · 5 months ago

You're not going to find evidence of sexual assault. The best you're going to find is some uncomfortable photos of him with his fans. He wouldn't do anything majorly aggressive somewhere where people can easily get evidence on him.

What we do know is hundreds of girls and con volunteers have all spoken for over a decade about his behavior. I have witnessed some aspects of this behavior first hand

(He walks around cons with groupies following him, and no security to keep them from crowding around him. That is a huge safety issue.) I have never been to a con where someone hasn't brought up what a prick he is.

We've also now got other voice actors speaking out against him. Some have said while they have never witnessed anything, they have heard the rumors too and believe them. Others have said they have seen him get a little weird with his fans before, and it isn't an industry secret.

Ultimately, all we have here are witness statements, with no physical evidence beyond a few awkward photos. But the difference between this and say the moon landing, is that there is no evidence he DIDN'T do any of this, whereas we have evidence that the moon landing DID happen.

[see more](#)

9 ^ v • Reply • Share ›



Jessica Ailin Gramkow → Confish1001 • 4 months ago

Never met Vic personally, never knew his work apart from RWBY (I watch subbed anime and the ones I watch dubbed is in my own language, since I'm from Brazil) and never knew all the shitstorm that was happening with Vic until I started to read some reddit posts about it. Needless to say, I was shocked, but not at all surprised, since sexual harrassment is a nasty shit occuring in the industry for years now.

But I do believe that the hate bandwagon is true and most people are jumping in just for their 10 minutes of fame. This mob mentality is true and it's disgusting. I'm not saying that ALL allegations are fake, some may be true, who knows? But who am I to judge when I don't have anything besides the good ol' she said/he said?

Vic can act like a prick in conventions, that much seems to be the consensus. More than once I saw people complaining that he was late for his pannels, left early, things like that. And that sucks. I wouldn't doubt that some of those allegations came from unhappy fans that were treated poorly during pannels (BUT NOT SEXUAL HARRASSED OR HARRASSED AT ALL).

What pisses me off too is that a lot of VA's that worked with him for years apparently "Saw it happen" or "Happened to them" and they never did

ANYTHING. But now that there's an angry mob with the #KickVic they suddenly have the urge to step up and say something. It seems iffy, if you ask me.

Either way I'll wait for the authorities or someone come up with REAL EVIDENCE of this, because so far all that was presented to me was hearsay and bandwagons full of haters.

2 ^ v · Reply · Share ›

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Secundum · 5 months ago

Either provide proof or it didn't happen.

'Innocent until proven guilty.'

Even if every single allegation is true (which is a statistical impossibility), we should still treat the accused as normal, because to do otherwise is a VERY slippery slope.

7 ^ v · Reply · Share ›

Iggy → Secundum · 4 months ago

Corporations don't need to conform to legal basis in that regard. They can fire anyone for anything without having to need to explain any of it. Though, the moment it becomes an issue of any sort of discrimination, that's when one lawyers up.

If a company determines association with an individual is a risk, there is no such thing as "innocent until proven guilty."

3 ^ v · Reply · Share ›

Fiere → Iggy · 4 months ago

Yet they kept him for all of these years, despite voice actors claiming its true and he has done it to them.

^ v · Reply · Share ›

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Xiro → Secundum · 4 months ago

So now we start recording our encounters with him and he will now completely

change the way he interacts with people. Aren't you smart.

As the author put it, hundreds of reports over a span of years, how likely is it that every single one is a misunderstanding or outright false? Not very. Innocent until proven guilty is a phrase for the courtroom.

3 ^ v · Reply · Share ›



Daniel Chung → Xiro · 4 months ago · edited

and it's to prevent mob mentality...DO YOU UNDERSTAND HOW DIFFICULT IT IS TO PROVE YOU AREN'T A SEXUAL PREDATOR? you know how difficult it is to shake off such labels EVEN IF it's found that you aren't a sexual predator? that label IS FOR LIFE.... not only that.... but we actually have evidence of people falsifying information, hell the people in the photos, that we've seen, demonstrated and stated that the allegations or the use of their photos for such context is completely false.

If you want to go with "innocent until proven guilty" stays in the courtroom, then there's no justice.... there's only vindictive and mob mentality..... and you know how dangerous that is? people HAVE BEEN LYNCHED.

9 ^ v · Reply · Share ›

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Charles Mitchell · 3 months ago

I believe in waiting for any and all evidence to be presented. Some of the "evidence" presented by ANN has been debunked by the people in the photos who never said they were touched inappropriately and that their photos were used without their permission - now maybe it was a mistake on behalf of ANN or just an intentional attempt to falsify evidence i cannot say. This is why trial by social media is stupid and wrong.

I never knew Vic's name until all this happened, i have watched several animes he worked on - but i do not follow voice actors so i have no idea who any of them are. I am not a fanboy for Vic. So i am not blindly backing him nor am i backing the accusers. I get that they might have been afraid that they would not be believed, or their jobs would be at risk. But if you are working with someone that has assaulted you is that really a place you should remain or want to be? Not victim blaming here, just stating if a co-worker assaults you sexually or violently

you should tell somebody. Go speak to a higher boss or the HR dept. if serious enough (like rape or attempted rape) tell the police.

As to the studios like FUNimation and Rooster Teeth firing someone or conventions banning them on unproven rumors and accusations alone - should they then not also take action against the other VA's who have said that they KNEW for years about Vic and said nothing?

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IGeo · 5 months ago

/Todd is the good guy here. Hoping he overcomes this and ultimately wins this war, He certainly has the resources to triumph and silence his accuser.

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Dave IGeo · 5 months ago

I don't know if any of the allegations against, nor commendations for this person are factual or not. I do know that this issue is systemic throughout our culture. Regardless of the area, function, business or occupation. Sexual abuse is and always has been a major problem throughout the history of humanity. We can be eternally thankful that today's methods of information distribution can now make these allegations known much faster than ever before and we can now render whatever assistance is needed, be it legal, medical or just a sympathetic ear. This and the fact that those who have been abused are now speaking up, not hiding or repressing their abuse and allegations.

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Esmondtheleo → Dave · 5 months ago

We also know that there are plenty of false charges and if you look hard enough you find alot of them get over turned later but no one reports that normally cause it doesn't seem as much of a story to talk about male victims of false allegations. And men are usually made the abuser or if they are abused they are made to look weak. Until real evidence is made public, any accusations or actions taken against him by companies over the allegations is a hasty judgment and for me personally they will lose my respect as a whole for covering for themselves now and not either acting before or sticking it out till the truth is revealed.

2 ^ v · Reply · Share ›



DerekPadula Mont · 4 months ago

Since this article was published on Feb 1, more conventions have cancelled Vic's appearances, including the Dragon Ball-centric KamehaCon in Dallas, Texas.

Monica Rial, the voice of Bulma, has said that Vic Mignogna assaulted her:

"Stop harassing my friends and colleagues. You want the truth? IT HAPPENED TO ME! I had hoped it wouldn't come to this but here we are. I don't owe you anything but if it'll stop it from happening to someone else, then so be it. I will tell you everything when I'm ready to do so."



3 ^ v · Reply · Share ›



AntilMetaman → DerekPadula · 4 months ago

Well, I didn't even know who Vic was 3 days ago but since this was all over my twitter and youtube feed, I had no choice but to do the research. This article was very well written and non-biased compared to the ANN article. I do agree that even without evidence, if allegations from hundreds of people dating back from 2003, are all on the same person, then that shows a pattern of behavior. The issue of hugging and kissing people on forehead/cheek is clear and there's no doubt about it. Vic even has admitted to it. What's not clear are the allegations of sexual assault / rape. Now with

Monica Rial coming out, there's more to the story than just Jessie Fungmore. I'd have to say that as an animation company who cares about their reputation, they would probably fire him and that goes the same for conventions. Not having no support from fellow VAs and this many allegations is something to not ignore. I do think that everyone deserves a fair trial and proper investigation.

6 ^ v · Reply · Share ›



Xiro → AntiMetaman · 4 months ago

Considering Ms. Rial is another big name for Funimation, it would be very unwise to keep him on at this point.

2 ^ v · Reply · Share ›

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Poosmith → DerekPadula · 4 months ago

So apparently, Monica Rial has just taken Vic's position from Rooster Teeth right after he got fired.. hmmm idk but smells a bit fishy :thinking:

2 ^ v · Reply · Share ›



Brendan Ledwith → Poosmith · 4 months ago

What role? Do you mean voicing Uncle Qrow? Because besides rumors that I can find no evidence for, I'm very confused about your statement. And if that is what you mean, I'd be inclined to doubt such a rumor regardless, unless Monica has demonstrated substantial ability to voice male characters?

1 ^ v · Reply · Share ›

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Iggy · 5 months ago · edited

I can't speak for anyone here but myself, and anything I say can ultimately be dismissed because I choose to retain my anonymity and all persons involved.





So whether you take what I say as fact or fiction is entirely your call. But from my PERSONAL experience, Vic was one of the most rude and toxic individuals I've ever met. He never violated my space, never acted abusively towards me, and never harassed me, but he

was hostile to a point where he literally cost me a job.

I've long moved on since and I am happy with what I do, but because of this I'd be lying if I said I didn't bear some level of a grudge against him. And that makes any opinion of the man, and his accusers, completely biased.

I am not jumping on the bandwagon because everyone else is, but I ultimately and fully side with every single one of his accusers. Not because it's the right or decent or factual thing to do. I do it because I am personally vindictive towards him. It's petty as all hell, I know that. But it's at least a reason that is personal to me, and not because of something I read online.





I want this guy to rot in unemployment hell because he put ME through an emotional roller coaster. Justice for his victims is just a bonus to me. I know that makes me a pretty terrible person, but in every single past case like this, I always advocated for honesty, transparency, and rational thought before immediately picking side. If I'm going to point out to any hypocrisy, it'll at least be my own.

4     [Share](#)



DerekPadula Mod  [Iggy](#) • 5 months ago

Since this article was published, Vic has had several more conventions cancel his appearances. And earlier today Vic was fired from his role on the show RWBY.





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Iggy  [DerekPadula](#) • 5 months ago

Wonder how Funimation will respond. He's not an actual Funi employee, but he's one of their most frequent freelancers.

Considering some of the shit their employees have put up with regarding him, I imagine this is exactly what they were looking for to sever business with him. They could even go so far and recast Broly for the home video release.

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ListlessAzure • 3 months ago

while overall each element, mostly takes a neutral stance, when looking at the whole, it



focuses solely on his negative, giving only of a poor light placed upon him, with no rebuttal or mention of actions by the accusers or their own controversies that have come out.

"The allegations against Vic Mignogna have not been proven. But logic dictates that if hundreds of people across a span of 16 years come forward to share their stories of how they were sexually assaulted or offended by the same man, and none of these people know one another, then there is likely some truth to their claims."

-Logic also dictates that when someone is proven to have lied they will continue to do so, therefore if one person has lied about an action or claim then their word should be weighted far less because of it, this is why known liars and fabricators are not used in courts by prosecutors due to their character being in question. With the validity of the current accusers in question, their stories lacking consistency and being found with severe issues in validity.

A major point I feel was missed was the Fumimation Internal investigations that occurred. that two were done, the logical thought would be that he had done an action that between the first and the second caused him to be fired. however no allegation has been brought forwards that was within that scope of time. Now this causes a conflict with the narrative because one



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DerekPadula Mod [ListlessAzure](#) • 3 months ago

Thanks for the detailed rebuttal and counterpoints. I will take these into account when I write a revised version for my book, USA DBZ, and for any future articles on the topic of Vic Mignogna. I appreciate you taking the time to provide statistics and sources.

2   [Reply](#) [Share](#)



A.O.Cortez • 3 months ago • edited

this is dangerous trend nowadays... remember smollet's hoax ? it is so easy to claim something yet in the face of real police investigation the truth came out the opposite.

you need to be careful in writing about this issue as it is as of now a mob justice on social media. People with axe to grind will pile on and on for what ? petty revenge ? it is also unfair for you to bring rumors of homophobia and antisemitism as if it have any bearing on sexual assault which is a crime by itself. No need to add rumors to the mix just to make vic worse , the victim should take him to court and let police handle it.

imagine , nowadays , it is safer to be investigated by police and proven to be innocent.. than to face lynch mob in social media where there is no justice except lynching..

1 ^ v • Reply • Share >



Pecan Crisp • 4 months ago • edited

Really? You go into great detail about all of this evidence that can't be proven true or false, but don't talk at ALL about all of the evidence from KickVic that not only COULD be proven false, but WAS. The edited footage, multiple people coming out and saying their footage/photos were being used for this without their consent (and that they actually stood with Vic), the fake swatting by someone at Fumination; You can say all you like that neither side can be proven, but we've certainly proven that KickVic is not above false claims. Edit: just realized how long ago this was written, a lot of this hadn't happened yet. Sorry about that. But you can't deny that a lot of the stuff that's come out shed's quite a bit of shade on the KickVic sides truthfulness.

1 ^ v • Reply • Share >



DerekPadula Mod → Pecan Crisp • 4 months ago

You're correct that I wrote this article before those events occurred. I may write a follow-up piece or perform an interview with Vic, as one of his close friends wants him to do an interview with me. We'll see what happens. In the meantime I've been busy working on my next book: Dragon Ball Language.

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Spartacus · 4 months ago

@DerekPadula - Do you happen to have a list of the VAs who have come out and said that they too were victims? So far I know of Kara Edwards and Jamie Marchi

1 ^ v · Reply · Share >



DerekPadula ^{MOT} · 4 months ago

Yes. Here's a list of the voice actors who have spoken out so far:

MONICA RIAL

<https://www.instagram.com/p...>



"This behavior has been going on for 15+ years. We're not going to allow it anymore."

KARA EDWARDS

see more

2 ^ v · Reply · Share >



Michael Harrison · 5 months ago · edited

Okay I haven't read through all this but I know how it feels to be accuse of sexual harassment from the 4th grade from being double dare to touch a girl on her front left shoulder and a girl I like who was her best friend added more to their story, like I went in the girls locker room and tried to pull their shorts or pants down.

I also didn't recall during this as a child, but I also had things I didn't recall so much during my childhood but this I didn't do and told my grade school counselor that I did touch the girl on the shoulder but I didn't remember during the other stuff and as now I know I didn't feel like I

wouldn't of done that. My grade school counselor ask me if I was trying to make friends, so at that time I know I couldn't get out of that so I say "yes" to her, and I guess we talk about things and how to reenact with girls, because now I'm very careful how I talk to women and how I show I'm interested in them.

So this makes things hard for me in some areas but I had over come this.

I also think this should be look into more and to try to find proof or people who might of been witnesses to these events, that been told about him. Also photos that might of been taking that's not been photo edited with fans that look like he might been during things like this with women if any photos been taken, because most voice actors/actresses have their photos taking with fans or people.

1 ^ v · Reply · Share ›



vnisanian2001 · 2 months ago · edited

I hope Judd Apatow, who started the attacks on Cosby, dies a slow and painful death.

I also hope the baddest thing ever happens to CNN's Don Lemon, for giving those liars a platform and a voice. Dr. Phil needs to have the same thing happen to him, too.

^ v · Reply · Share ›



vnisanian2001 · 2 months ago

A lot of Bill Cosby's so-called "victims" were actually already proven false, but the media's not doing a retraction.

^ v · Reply · Share ›



rjd1922 → vnisanian2001 · a month ago

Source?

^ v · Reply · Share ›



vnisanian2001 · 2 months ago

MarzGurl is an evil cunt who needs to be held in a maximum security prison.

^ v · Reply · Share ›



vnisanian2001 · 2 months ago

Anime News Network is a piece of fake news that needs to be banned from the media, and you are clueless for supporting the #Me Too Movement and believing every single woman who says they were raped.

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Tony Tony Chopper • 2 months ago

well, I guess in this case we should like the voice but not the man. I hope he can keep his career, but only because his voice works well for the roles in witch he was cast. if broly appears in the future, I just hope he is allowed to come back a play that role.

^ v • Reply • Share >

Feb 1, 2019

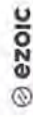
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73773



RoosterTeeth

16 years old

from Austin, Texas

Born April 1, 2003

Joined October 1, 2018

VIC MIGNOGNA

4 MONTHS AGO

Effective today, Vic Mignogna is no longer a part of the cast of RWBY and Rooster Teeth is ending all associations with Mignogna. This will not affect the creative content of RWBY.

UPDATE: We in the RT Admin Team have always supported civil debate on the site. Recently we've seen less than civil conversations and debates around here, and we would like and we ask you to keep the site ToU in mind when you are posting. If you believe a post violates the ToU, you can flag it for moderation attention by clicking the little flag at the bottom right of the post. However, posts not violating the ToU should not be flagged and repeated flagging of posts simply because they do not agree with your views is not acceptable behavior. For more information on what constitutes a flaggable post see this thread and feel free to contact an admin through direct messaging for clarification of any points.

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3313

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Everyone, we wanted to give you an update on the Vic Mignogna situation. Following an investigation, Funimation recast Vic Mignogna in Morose Mononokean Season 2. Funimation will not be engaging Mignogna in future productions.

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We come from the future



One of Anime's Biggest Voices Accused of Sexual Harassment



Beth Elderkin
2/19/19 3:30pm

Illustration: Jim Cooke, Photo: Getty Images

Last summer, voice actor Vic Mignogna went into a booth with a few others to record audio for a video game. At one point, Mignogna asked the client, who was overseeing the session, if she was okay with his performance. When she didn't answer right away, he followed up with: "You know the old Latin—or is it Greek? There's an axiom that says: Silence gives consent."

Stories about Mignogna have been circulating online for over a decade, including through the Tumblr blog Dear Vic Meggnogna, but the latest round of accusations started surfacing around mid-January of this year. io9 spoke with more than 25 voice actors, cosplayers, industry professionals, convention employees, and former fans about their experiences with Mignogna. Many of them asked not to be named in fear of retaliation from Mignogna or his fanbase. These, along with the testimonials circulating online, paint a picture of a 56-year-old man who aggressively hugs, grabs, touches, kisses, and propositions women—often without asking for their consent. It happens at panels, in autograph lines, at private events, and behind closed doors. His behavior has become so known in the anime and comic convention communities that it's more than an open secret.

“Have you heard of the missing stair analogy?” voice actor Jamie McGonnigal said. “It’s basically what happens when many folks in an industry know about a certain person, and warn everyone about that person, kind of quietly... It’s related to a missing stair in that, yeah, the stair is missing, but you tell the people that you know to skip that stair because it’s broken. The problem is, people who don’t know about that stair are bound to trip [on it]. That’s what it’s been like for upwards of 15 years. People just know about Vic.”



An image from Funimation’s *Dragon Ball Super: Broly*, which featured Vic Mignogna as Broly.
Image: Sony

Vic Mignogna's name might not ring a bell for most, but within the anime community, he's a household name. He's appeared in hundreds of anime shows, films, and video games since 1999, including playing the lead in 2004's *Fullmetal Alchemist*. Recently, he was heard as Broly in Funimation's *Dragon Ball Super: Broly*, which made more than \$30 million at the U.S. box office, an impressive feat for an anime film. It's the latest movie in the *Dragon Ball* series, one of the biggest anime franchises in the world. The series even had a balloon at the Macy's Thanksgiving Day Parade last year.

Over the course of his career, Mignogna has amassed a strong, largely youthful fanbase—including within his official fan club, the Risembool Rangers. He's also a regular on the anime and comic convention circuit, attending on average about 30 cons per year—though that doesn't look to be happening this year. Accusations of improper conduct with his fans, first reported by Anime News Network, led many comic and anime conventions to rescind their invitations to Mignogna. Entertainment group Rooster Teeth shared that Mignogna will no longer voice a character on its American anime, *RWBY*. Funimation, a top media company for importing and dubbing Japanese anime, announced it's "no longer engaging" with the voice actor, following an internal investigation. io9 has viewed three of the reports that were submitted to the company.

Voice actor Charlotte (not her real name) confirmed to io9 that she shared her story with Funimation for its investigation. She relayed to io9 her experience, one which Mignogna denied in emailed responses to io9's questions. Charlotte said that at a con in the late 2000s, she was getting ready to go to dinner with Mignogna and some other con guests and employees. Mignogna asked if they could stop by his room first, because he wanted to show her a video, and she

agreed. Because both were in relationships—Mignogna with his now ex-fiancée Michele Specht and Charlotte with her then-boyfriend—she believed the invitation was platonic.

As they watched the video, she says, Mignogna grabbed her by the arms and kissed her aggressively, including putting his tongue inside her mouth. She tried to pull away, only to have him pull her back in. She told i09 she felt scared and frozen, “like a board.” Then, things escalated. Charlotte said Mignogna backed her up to the bed and she fell down, then he got on top of her. Soon after, a friend came to check on them, and she immediately got off of the bed.

“I was saved by a door knock. I can’t say what would’ve happened [otherwise]. I don’t know if I would’ve kicked his ass, or he would’ve kept [going] and I stayed frozen,” she said. “I keep waking up in the middle of the night with that panic feeling. It’s that panic, it’s that feeling I have to do something to get him away from me.”



“I remember he said, ‘Open the door, nobody has to know.’”

Since the recent allegations have surfaced, Mignogna has released two statements on Twitter. First on January 21, saying he regrets if he made his colleagues or fans feel uncomfortable. The second statement, released on February 13, added that he’s taking time to “recommit to God and [seek] the

help of a counselor.” When reached by io9 for comment Mignogna said that he has never forced himself on anyone, claiming that “any and all encounters I’ve ever had have been 100-percent consensual.” He gave specific responses to the accusations present in this article—denying some and providing his own version of events on others.

Several people in the anime industry, speaking under the condition of anonymity, shared with io9 their experiences with the voice actor. Rachel (not her real name) recounted with io9 two experiences she says she had with Mignogna. She said the first one, which Mignogna has denied, happened at a convention in 2008. She said a relatively friendly weekend turned uncomfortable when, outside their adjacent hotel room doors, Mignogna grabbed her in a tight embrace and wouldn’t let go, even as she tried to pull away. Like Charlotte, she knew he was in a relationship. She then went into her room, which shared a door with his. That’s when the knocking started.

“I heard a slow knocking on the door that was between our two rooms. I knew it was him so I ignored it. And just after two minutes, the hotel room phone rings. And I answered it, and it was Vic. I remember he said, ‘Open the door, nobody has to know,’” she said.

She said he continued to knock on the door, and the phone rang at least one more time, until she stepped into the bathroom and turned on the shower—sitting on the bathroom floor for up to an hour, shaking.

The second situation happened at a separate convention a couple of years later. Rachel said she had agreed to stop by his room briefly. She said he invited her to sit down on the couch in the front room of the suite, and after a brief

conversation she claims he knelt in front of her and began rubbing the backs of her thighs, and said: "Let me be sweet to you."

Rachel told i09 she then got up to leave—only for Mignogna to stand up, embrace her tightly, and press his face against hers. She tried to get out of his embrace but says he wouldn't loosen his hold. She kept giving him reasons why he should stop, like reminding him he had a girlfriend, but he kept repeating the same line—"Let me be sweet to you"—over and over, at least five or six times, she said. Rachel says she eventually got out of his embrace and left the hotel room, and later told the con's guest services manager about the incident (the manager confirmed to i09 that they had been told).

Mignogna acknowledged this event happened, including that he rubbed the backs of Rachel's thighs, but said the encounter was consensual. He also said that, to his recollection, they had shared a bottle of wine, were "probably" in her room, and had kissed before she pulled away and asked that they stop, which he says he immediately agreed to and left her room. Rachel responded by denying they ever kissed and that she doesn't recall drinking wine with him. Both she and the guest services manager separately stated she had been in Mignogna's room.

Rachel says she did not report the incident to hotel management or to the police because she feared Mignogna would attempt to negatively impact her career. "He's very well known in the industry—very, very powerful in our industry," she said.

According to the guest services manager and Rachel, in apparent retaliation after his sexual advances were rebuffed, Mignogna requested that Rachel be moved to another room for their previously scheduled joint autograph signing session (Mignogna denied doing this). Rachel said she spent the two-hour session alone, as most fans were there to see him.



Vic Mignogna as Captain Kirk in the *Star Trek* fan series, *Star Trek Continues*.
Image: [Star Trek Continues \(YouTube\)](#)

Voice actor Gretchen (not her real name) described to i09 how, before their first panel together at a con in the early 2010s, he grabbed her from behind and starting tickling her aggressively until she screamed at him to stop. Mignogna told i09 he did tickle her without her consent, calling it a “playful and friendly” attempt to lighten her mood.

There’s also a way Mignogna sometimes hugs women, as detailed by one voice actor and confirmed by several others who’ve experienced or witnessed it. According to the voice actor, who asked not to be named, when Mignogna greets women, sometimes he’ll grab a handful of hair so he can pull their heads back slightly, kissing their necks or whispering in their ears. She said it can sometimes happen in public, including in front of fans, and there’s pressure to go along with it so they don’t seem like they’re making a scene. Mignogna has denied this, telling i09, “I don’t greet people that way.”

In 2014 professional cosplayer Diana (not her real name) attended what she believed was a post-convention group dinner for con guests; however, when she arrived she found it was a private dinner with Mignogna. After dinner, Mignogna walked with her to a parking area. She claims he proceeded to grab and kiss her aggressively—without her consent—before inviting her to his hotel room. Diana said she refused, reminding him that she had a partner and knew he was engaged (at the time). She proceeded to walk away to meet with friends at a nearby hotel, one that Mignogna was also staying at. He followed.

“He’s sticking next to me the whole way there. He’s trying to convince me to come into his room and spend the night with him, saying ‘It’s so hard to find someone who understands the industry and lifestyle,’ saying he’d rock my

world,” she told i09. “We ended up outside of his door, and I was continuing to walk not realizing it was his room, when he stopped and was like, “This is my room, let’s go.””

She didn’t go.

Mignogna acknowledged this event happened but said he remembered it “very differently.” He said the two of them went out to a private dinner, after which they “mutually and consensually” kissed, and he invited her to his room. According to Mignogna, Diana responded that she wanted to, but “shouldn’t since we were both involved with someone else at the time,” after which they parted ways. Diana denied Mignogna’s version of events, saying “it wasn’t nearly as simple as he makes it seem—telling him we were both taken was not the end of it.”

Most of Mignogna’s responses to these women’s stories included some mention of how, from his viewpoint, the women seemed fine with their interactions—and even acted friendly toward him later. He mentioned that he and Diana “flirted quite a bit both times” they saw each other and noted how both Gretchen and Rachel were cordial or friendly with him during their interactions after the events took place. All three of them rejected this notion as being proof that they weren’t upset with Mignogna for his behavior.

“I have seen him a handful of times since, always in public or work settings. He is mistaking my ‘friendliness’ for professionalism,” Gretchen said. “Vic can try to justify his actions any way he likes, but it still doesn’t make them any less inappropriate or invasive. The man has no boundaries.”

“After the pic, I joked, ‘Well my friend’s gonna be angry’ and then he said, ‘Oh, let’s make her really angry.’”

It’s easy to find proof of Mignogna’s physical closeness with fans, especially female fans. There are countless photos available online—including through the hashtags #KickVic, which has shared accusations against the voice actor, and #IStandWithVic, which later emerged as a show of support. The photos show him hugging people, holding them in his arms, pressing his face against theirs, kissing them on the cheek. Some fans remark on their experiences with Mignogna positively and have been sharing their photos and stories in support of him. Others call their encounters with him uncomfortable and nonconsensual.

Former fan Viola Hewak told io9 that at a con in 2011, when she was 16 years old, she went to get an autograph from Mignogna—a common convention activity that fans sometimes pay for—when he unexpectedly got up and said, “I’m going to hug you!” Hewak told io9 he pulled her into an embrace, his hands sliding up and down her back and sides, and wouldn’t let go when she tried to pull away. At a 2013 con autograph signing, another former fan named Michelle Light said he kissed her intensely on the cheek right as their photo was being taken, without asking for permission first, and added that if she hadn’t moved her head she thinks he would’ve reached her mouth.

Con-goer Kelly, who asked her last name be withheld, described to io9 what happened at an anime con in 2014 when she went to get Mignogna's autograph for a friend of hers. She wasn't a fan, though she was familiar with his work.

"I regrettably asked for a pic with him as a way to show my friend, 'Hey, guess who I'm with.' After the pic, I joked, 'Well my friend's gonna be angry' and then he said, 'Oh, let's make her *really* angry,'" Kelly said. "He grabbed me into a tight embrace against his body, both arms. And it wasn't just a light peck on cheek, it was a big kiss. I remember when he did it, I felt frozen for a second, and then felt my face turning really red in embarrassment."

Convention staffers also discussed their own Mignogna interactions with io9. Two people who've worked at Phoenix Comicon (now Phoenix FanFusion) shared how staffers would sometimes alert coworkers over the radio when a certain person was entering an area. One of them described it being used for Mignogna, to make sure a particular 19-year-old female staffer wasn't in the area. She called it "Code Vic."





Vic Mignogna at the 2016 Webby Awards.

Photo: Getty Images

Mignogna's contact with fans isn't limited to autograph lines and panels. Over the past several years, especially following the success of *Fullmetal Alchemist* in 2004, Mignogna has cultivated a devoted fanbase online. Most notably, it's been through the Riseembool Rangers, an official Vic Mignogna fan group that was started in 2005 and is currently managed by Mignogna's mother, Barb Myers, who goes by the name "Matriarch" when she addresses the group. Most of the group's activity is on a Discord chat, which is a private text and voice chat primarily for gamers, so io9 can't independently confirm the current membership numbers. But there is an official Facebook page with about 5,500 subscribers, as well as a closed Facebook group for the Riseembool Rangers with nearly 1,600 members.

One former Riseembool Rangers member, Dave (not his real name), joined the group back in 2009 when he was around 11 years old. Dave described the group as "absolutely rabid," ready to defend the voice actor against any criticism. Still, he stayed because he was a big fan of Mignogna and an aspiring voice actor. He left the group shortly after meeting Mignogna, saying he no longer

considered himself a fan after their encounter. While taking a photo together at a convention in 2012, Dave said Mignogna unexpectedly grabbed him around the waist, pulled him close, and asked if he had a boyfriend. At the time, Dave was 14 years old and presented as a young woman.

“I felt violated and invalidated by my idol,” he said. “I wish that I could take it away from my memory because I can’t hear that guy’s voice without thinking about how I was a grossed-out 14-year-old kid...I love anime, and I legitimately cannot watch dubs with his voice in them.”

According to former members i09 talked to, the Riseembool Rangers lean toward the younger side and are sometimes underage. Mignogna communicates with his fans through email and has given out his phone number for fans to get in touch with him. He’s held Q&A sessions with members through the private Discord chat, and attends con parties hosted by the fan club—which have included events like a 2007 Twister competition, judged by Mignogna himself, where he (dressed in a *Star Wars* uniform) can be seen “signing” his name on a few young women’s lower backs as they’re playing.

A January 2019 chat, shared on the group’s Facebook page, showed Mignogna denying the allegations against him, suggesting it could be connected to the recent *Dragon Ball Super: Broly* release, and requesting members share positive stories about him online. Since then, at least eight people i09 talked to said they’ve faced online harassment for either sharing their stories or for stating online that they support the victims.

The harassment has included pizzas being sent to a former workplace, the receiving of death threats, and a fake Twitter account being created in the name of one individual. Mignogna initially spoke out on Twitter on February 8 to condemn harassment of people criticizing him. But an email shared with io9 also showed Mignogna, three days later, privately telling a fan how a certain voice actor had “turned to [be] hateful toward me.” Mignogna mentioned that person by name.



“If I’m a jerk and you don’t tell me so, then you’re consenting to me being a jerk. See how that works?”

In summer 2018, as preparations were being made to record the dubbed vocals for *Dragon Ball Super: Broly*, two people connected to the project met with Funimation executives to suggest Mignogna be recast due to some improper conduct allegations making the rounds in the voice acting community, according to someone present at the meeting. This person, who asked not to be named, said that Funimation later told them the company was conducting an investigation into Mignogna’s conduct—but it was inconclusive, so Mignogna was kept on the project. io9 reached out to Funimation for comment on this report, and the company referred us back to its original statement:

Following an investigation, Funimation recast Vic Mignogna in *Morose Mononokean* Season 2. Funimation will not be engaging Mignogna in future productions.

Mignogna told i09 that, until recently, he's "hugged everyone who comes to my autograph sessions," saying it's a common activity for voice actors. But he said that he's learned he has to change this. And over the past few weeks, Mignogna has seemingly adjusted his public behavior—at least at conventions. He appeared at Bak-Anime 2019 in early February, one of the only conventions he's scheduled to attend this year after a majority rescinded their invitations. Voice actor Neil Kaplan, who was also a guest at the show, said he didn't see Mignogna touching any guests during his autograph signing. He mostly stayed behind his table. There are also videos of Mignogna from his panels at that con, showing him tearfully apologizing for recent events, saying he got "lazy" about interpreting whether fans wanted him to hug them. But several of the people i09 talked to said it's time for him to be out of the voice acting industry.

Voice actors and other professionals have been speaking up online, including McGonnigal, *Dragon Ball* co-star Monica Rial, and voice actor Neil Kaplan—all of whom confirmed to i09 that Mignogna's behavior is a problem. Specht, Mignogna's ex-fiancée, also released a statement to i09. In her statement, she said she was not aware that he was pursuing other women during their relationship, and that she supports the people coming forward with their stories about Mignogna's behavior:

My 12-year relationship [and] engagement to Vic Mignogna ended in May 2018. Very soon after, information about Vic's previously unknown behavior began to surface, and has continued to do so over the last several months—each revelation more shocking and painful than the previous, spanning the entirety of our time together. I have had to face the reality that the loving, monogamous relationship I believed in and was devoted to never existed.

This pattern of egregious behavior is so linked to his position of power that the voices of those stepping forward with allegations need to be heard clearly, and their claims taken with the utmost seriousness. And I extend whatever remains of my broken heart to every one of them.

Last summer, Mignogna went into a studio and told a small group of people that silence gives consent. It may have been in response to a query about his performance, but voice director Donald Shults told i09 that it eventually became something else. When others in the room tried to push back, including Shults saying that the phrase doesn't reflect today's values, Mignogna didn't drop the subject. He clarified.

"If I'm a jerk and you don't tell me so, then you're consenting to me being a jerk. See how that works?" he said. "If somebody is doing something you don't approve of and you don't say anything...the implication is that you must be okay with it."

They're not silent anymore.

MORE IN-DEPTH



As Spreadsheet Of Accused Abusers Spreads, Anime Conventions Get Their MeToo Movement



I Cut the 'Big Five' Tech Giants From My Life. It Was Hell



Inside The Culture Of Sexism At Riot Games



Scientology Attorney Demands Jezebel Remove Our Story on Shelly Miscavige's Alleged Disappearance



Turning Off Facebook Location Tracking Doesn't Stop It From Tracking Your Location



Twitch Sale Of Curse Media Will Combine Two Popular Gaming Wikis

ABOUT THE AUTHOR

Beth Elderkin

Beth Elderkin

Video Editor and Staff Writer at io9. My doppelganger is that rebelling greeting card from Futurama.

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216

Vic Kicks Back

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0.5k shares

Story

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Vic Mignogna spent the past two decades building a career as a voice actor. He worked with great people, made great friends, and represented great companies.

Over the past month, all of that work and goodwill was maliciously and brutally destroyed by a dedicated group hell-bent on dragging his name and reputation into oblivion. This capped off with hurtful allegations from people Vic has worked with, and considered friends, for many years.

Now Vic has been removed from Rooster Teeth and Funimation, and disinclined from several conventions, disconnecting him from his income and from his fans and supporters.

Vic has tried to mitigate the situation with public statements, and the attacks on him and his character persist. Anyone who knows Vic knows he would never ask for this, and does not want this course of action. When your opponents leave you no choice, you eventually have to kick back.

This Fund is set up for Vic's legal defense fees. There are MANY possible defendants in different jurisdictions, from boring bloggers to multi-million, even multi-billion dollar corporations. It takes an

\$182,860 of \$200,000 goal

Raised by 5,654 people in 4 months

Donate Now

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Created February 19, 2019

Nick Roberts on behalf of Beard Harris Other SPICER, MN

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\$100 Brandon Guillory 6 hours ago

\$20 Anonymous 8 hours ago

\$20 Harry A 21 hours ago

\$50 Anonymous 1 day ago

\$50 Ange Time 1 day ago

\$20 Anonymous 1 day ago

\$74 Michelle Gorman

From: Chuck Hüber <fireflyworks@gmail.com>

Subject: Re:

Date: March 6, 2019 at 4:16:36 PM CST

To: Monica Rial <monicarial@yahoo.com>

If you are talking to attorneys then legally and ethically my job is done and your next step is to contact the law firm. They will not reach out to you and you should expect to be served in the next couple of days.

On Wed, Mar 6, 2019 at 4:15 PM Monica Rial <monicarial@yahoo.com> wrote:
Give us some time to go over this information with our attorneys and we'll get back to you.

On Mar 6, 2019, at 4:06 PM, Chuck Hüber <fireflyworks@gmail.com> wrote:

Sean and Chris are not going to show up in court for you. You will be on your own. You have a chance to walk away gracefully and let the lawyers fight with companies if that is the end result. Anyone egging you on toward the suit does not have your best interests at heart nor your financial responsibility. The lawyers are indifferent to this negotiation and it is solely my own...as you'd expect from me.

On Wed, Mar 6, 2019 at 3:40 PM Monica Rial <monicarial@yahoo.com> wrote:
Before we waste the time drafting a statement, is this something you have discussed with his legal team? Or is this simply a trial-and-error situation?

On Mar 6, 2019, at 3:36 PM, Chuck Hüber <fireflyworks@gmail.com> wrote:

And obviously this is all preliminary work to see if negotiations are even possible which I believe they are. Once there is a table set with possibilities everything would go through the law firm. You would contact them when you're ready but there is only a couple days left to figure out a deal.

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What changes would you make?

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-Monica-

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From Monica Rial, Jamie Marchi, Ron Toye

Things have gotten out of hand and some form of working together is the only way to solve the split that has fractured the fandom we all love. This statement intends to start that healing process. Some of the ways we have spoken out against Vic have been over the top, and have done harm to victims of sexual assault by making it more difficult for them to come forward. So many of you have reached out to us to tell your stories not related to Vic and we encourage you to continue. We agree that everyone has a right to demonstrate that they've changed and that Vic should be given that opportunity. Our zeal to protect all victims of sexual assault, moved by heightened social attention, has caused us to misunderstand and misstate stories regarding Vic indicating they were akin to criminal offenses when they were inappropriate advances. Our intention has never been to destroy Vic but to help him realize his behavior and to lift up victims who have been hurt. We are willing start again and we ask everyone to join us.

Funimation

We have reconsidered our decision and Vic will continue in the roles he has played for so many years. At this point he will not be available for casting in any new properties but we are willing to give him a second chance, with proper oversight, for the sake of the fandom. He is sincere in his efforts to look at his behavior and we intend to support those good efforts. We have implemented training for voice actors surrounding fan interactions and social media. We will expect more of ourselves as a company while expecting better from our artists. There are no winners in this fight and the ones who lose are you, our fans.

100% of Vic's gofundme has been matched quadruple by Funimation and \$512,000 has been jointly donated to RAINN in the name of all Anime Fans.

(Vic pays legal fees out of pocket)

No idea if Funimation would agree to such a thing but it would be PR money well spent.

Chuck Huber
Talent Agency
Appearance Agency

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On Wed, Mar 6, 2019 at 12:57 PM Monica Rial <monicarial@yahoo.com> wrote:
Hey Chuck,

I hope you don't mind that I've CCed Jamie on the email. Does he realized that all of this could've been avoided if he had just released this statement in the beginning? Here's what I don't understand, what is our part in this? If he releases this statement, what does that mean for us? That he'll drop any/all suits? I would need to know that before I agreed. If that's the case, I would love to make this work. Here are some things we would need though:

- A statement in writing stating that he would not sue us or our employers at a later date.
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Let me know you what you think.

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From: Jamie Marchi <mymarchi@gmail.com>
Subject: Re:
Date: March 6, 2019 at 4:02:54 PM CST
To: Chuck Hüber <fireflyworks@gmail.com>
Cc: Monica Rial <monicarial@yahoo.com>

That statement is not true. We will not make any statements that are not true.

On Mar 6, 2019, at 3:55 PM, Chuck Hüber <fireflyworks@gmail.com> wrote:

I've discussed it with them. They have the statements and have given their input. I'm pushing as hard as I can on both ends to try and meet in a middle.

Please note the disclaimer at the bottom
Of my emails. It would be a serious breach to be sharing with outside parties the contents of this negotiation and would likely scuttle it.

On Wed, Mar 6, 2019 at 3:42 PM Chuck Hüber <fireflyworks@gmail.com> wrote:
And please don't mistake this as some weakness on their part. This is my efforts to try and stop something I know will be very damaging. They have a full court press prepared that is not a minor effort. They will be extremely thorough in both the legal and social spheres.

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vic mignogna

@vicmignogna

Follow

This is heartbreaking. Over the last few days, a number of comments and allegations have been voiced on social media. I'd like to share my thoughts.

Homophobic? NO! Some of my dearest friends are members of the LGBTQ community, including several that I brought into my production family on Star Trek Continues. This is a blatantly false statement. I said many years ago that I didn't think a particular character I voiced was gay, contrary to what some fans believed, not because it matters to me AT ALL, but because I was told this was the case. I also elected not to autograph Yaoi, not because I am homophobic but because I didn't wish to sign material that was not canon.

Anti-Semitic?? I couldn't even grasp where this was coming from until someone pointed me to a moment years ago where I was in a panel, and referred to a bunch of noise coming from another room jokingly as "a holocaust." As I said then, it was a metaphor for armageddon, death, and mass destruction, but not "THE Holocaust." Could I have chosen a different word? Sure, in retrospect I could have. And, of course, I am sorry that it offended anyone.

I sincerely apologize to any convention staff member who ever felt I was anything less than kind and grateful to be included in their event. Unknown to most staffers, contractual arrangements made in advance with cons were occasionally not honored when I arrived and that made me frustrated. That does not excuse making anyone feel badly and I am deeply sorry.

I would also like to sincerely apologize to anyone who ever felt my interaction with them (a hug or a kiss on the cheek or forehead) was crossing a line. Never in a million years would it be my intent to make anyone feel uncomfortable. Rather, it was meant to show gratitude or support. I come from an affectionately expressive family where such displays are commonplace. But I understand that not everyone feels the same way. Hence, I will not be interacting in the same way with fans in the future. Understand this is the climate we live in and this is how it has to be. To my fans who ask me for hugs, etc., I'm sorry, but please know that I am no less grateful to or supportive of you!

Finally, any allegations of sexual harassment, sexual assault, or most disturbingly, pedophilia are COMPLETELY AND UTTERLY FALSE. My heart weeps for anyone who endures a violation of this kind, so to be accused of harming others in this way...I have no words.

Sincerely,
-Vic Mignogna

10:45 PM - 20 Jan 2019

3,213 Retweets 15,403 Likes



2.2K 3.2K 15K

From: Monica Rial <monicarial@yahoo.com>
Subject: Fwd: Dear Monica
Date: February 8, 2019 at 12:13:50 PM CST
To: Colleen.Carroll@Funimation.com

This is what he always does. He's trying to use his charm to get out of this. He knows what he did. It's disgusting. AND he was told by Sony NOT to contact me.

Thank you,
~ Monica Rial ~

Begin forwarded message:

From: <victthewop@aol.com>
Date: February 8, 2019 at 11:58:38 AM CST
To: monicarial@yahoo.com
Subject: Dear Monica

Dear Monica,

I understand that I have hurt you deeply, and I am writing to humbly ask your forgiveness. I have been racking my brain trying to figure out what I did that would make you so angry with me, and I am embarrassed to say that I honestly don't know. I hope you will share what it is with me so that I may sincerely apologize. I have had to step away from social media for sanity's sake. A friend alerted me to your recent tweets.

You have always been one of my most cherished friends in the industry. The thought that I have caused you pain is unconscionable. I am learning that I have not been good at discerning how I come across to others and I am working on being better and doing better with the help of a counselor. I have been crushed under the weight of the events of the past 3 weeks and am fully committed to changing the things about me that need to change.

I sincerely hope you will find it in your heart to share with me what you're thinking and feeling. Regardless, please know that all the years we have been friends, all of the events, projects and meaningful conversations we have shared are treasured ones, and I am gutted at the thought that I ruined something I valued so very much.

Vic



vic mignogna ✓

@vicmignogna

Follow



My desire has always been to show appreciation, warmth and acceptance to fans of my work. Being part of this community has given both my work and my life so much meaning. If anyone has been made uncomfortable by me, it's not for me to contradict them. It's impossible for me to discern another's personal boundaries. I regret anything I have said or done out of ignorance that has put anyone outside of their comfort zone.

I love my work dearly, as well as the characters I've had the privilege to portray. But most satisfying of all has been the opportunity to share that love of this art form with fans all around the world. I would never have met any of you without it. Meeting each of you has so enriched my life, and I'm humbled to have received over a thousand encouraging messages in the last few weeks.

To my colleagues- I have considered you good friends for so many years. We've shared countless wonderful experiences together, and I never meant to do anything to offend or hurt you. Until these last few weeks, I had no idea that any animosity even existed. I've never had anything but respect for you, and I so deeply regret any words or actions that made any one of you feel otherwise.

In many respects, life is about course correction and growth. So many fans have written me over the years about very personal issues & struggles, and I have always done my best to encourage and support them. The truth is that I am just as susceptible to struggles and difficulties as anyone. I have identified areas in which I need growth, and am taking this time to recommit to God and seeking the help of a counselor. I am committed to putting every effort into improving not only for myself, but for everyone I interact with. Each of you deserves nothing less.

Finally, please be kind to one another. The very last thing I want is for ANYONE to be hatefully targeted - especially not on my behalf.

Most sincerely,
-Vic Mignogna

8:16 PM - 13 Feb 2019

4,637 Retweets 20,980 Likes



3.0K 4.6K 21K



vic mignogna • @vicmignogna · Feb. 20

Words cannot express the depth of my gratitude for all the kindness and support that has been shown to me over the last few weeks. I had hoped that my apologies and acknowledgments, both public and private, would be received. But I have now very reluctantly retained a law firm as my last and only recourse to attempt to salvage my reputation and my 20-year career in this industry.

A friend expressed a desire to set up a GoFundMe for legal expenses. I approved his kind offer and am so grateful, but I am not managing it, nor will I personally receive any of it. Any surplus will go to the Salvation Army Dallas Domestic Violence and Abuse Shelters.

I hold no malice toward anyone. I just love my work and the fans, and sincerely wish to continue.

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I hold no malice toward anyone. I just love

3.3K 5.3K 22K

April 4, 2019

Character statement, Victor J. Mignogna

To whom this letter may concern,

My name is Alyssa Fluty. I am a freelance manager for comic conventions and Japanese anime conventions in regards to safety, being crowd management certified by the state of Maryland for occupants up to 250 people and overall operations.

I have known Vic Mignogna for just over 10 years. We first met at a few anime conventions in Florida in a very typical scenario of him being the invited guest and myself a common attendee. From the very beginning, Mr. Mignogna made it a benchmark trait of his to express kindness, respect, and openness to those whom met him at conventions or otherwise. In a world where those traits are becoming more rare, it made a profound impression.

I began to volunteer Vic sometime later, running an online fan-club store, and aiding him at conventions either to safely manage queue lines in accordance with fire code or sell merchandise, as his popularity attracts a large number of fans.

He would sign items for them, pose for photographs and embrace fans with either hugs or kisses should the fan request.

On occasion I would email, text, message or call Vic in regards to any topics of interest to either brainstorm methods of marketing his personal brand, to simply making remarks on a recent sci-fi show. Never in any correspondence we shared did i feel uncomfortable, nor fearful for my personal safety.

In late January of 2019, various individuals made outlandish allegations against Mr. Mignogna in relation to sexual assault and other similar charges.

I can personally say that any type of embrace Vic bestowed was always consensual, and usually initiated or requested by the second party. A torrent of hearsay fueled by the untamable winds of social media took these allegations, and began to severely damage Vic's career that he poured time, talent, and heart into for the past 20 years.

I watched my usually confident, cheerful, and optimistic friend be thrust into mental anguish and duress , unable to defend himself in the court of social media.

Vic is a good friend. I have never witnessed him mistreat any persons either fan, staff or industry wise. He is kind, thoughtful and very generous with his time. Should any clarification in regards to the above statement be needed, my contact information will be made available below. Your time and very careful consideration in this is very appreciated.

Sincerely,

A handwritten signature in black ink that reads "Ms. Alyssa A. Fluty". The signature is written in a cursive, flowing style with a large initial "M" and "A".

Ms. Alyssa A Fluty
40 Brookview Avenue
Apt #3
Troy NY, 12180
(518) 961-4401
alyfluty@gmail.com

INDEPENDENT CONTRACTOR AGREEMENT: VOICE ACTOR

This INDEPENDENT CONTRACTOR AGREEMENT ("Agreement") is executed as of 11/30/18 ("Effective Date"), by and between Rooster Teeth Productions, LLC, a Texas Limited Liability Company (the "Company") and Vic Mignogna ("Contractor"), with reference to the following facts and circumstances:

A. The Company desires to engage the services of Contractor as an independent contractor upon the terms and conditions set forth herein.

B. Contractor desires to perform the services as an independent contractor as provided herein, and has represented to the Company that it has the training, facilities, equipment and experience necessary to perform such services.

NOW, THEREFORE, in consideration of the premises and of the mutual promises, representations and covenants herein contained, the parties hereto agree as follows:

1. *Services.*

(B.1.a) Duties. The Company hereby engages Contractor as an independent contractor to provide the services and materials (the "Services") described on the attached Exhibit "A," and Contractor agrees to provide the Services upon the terms and by the deadlines set forth herein and in Exhibit "A," Contractor shall provide the Services in a diligent, competent and professional manner, in furtherance of the best interests of the Company and its client. Unless otherwise specified herein or by the Company from time to time, Contractor shall determine the method, details and means of the Services.

2. *Term.* Unless the Services are terminated earlier pursuant to Paragraph 5 below, this Agreement shall become effective on the Effective Date and shall continue in full force and effect until such time as all of Contractor's obligations under this Agreement have been satisfied.

3. *Compensation.* In consideration of the Services to be rendered by Contractor hereunder, the Company agrees to pay to Contractor, and Contractor agrees to accept fees in the amount described in Exhibit "A."

4. *Expenses.* The Company shall reimburse Contractor for all reasonable out-of-pocket expenses approved in advance by the Company, and incurred in the performance of its duties hereunder, promptly upon presentation to the Company of appropriate and detailed back up, invoices and documentation evidencing such expenses (including vouchers or receipts).

5. *Termination.* Either party may immediately terminate this Agreement with no liability to the other party if the other party is in breach of any material term or condition hereof, and such breach continues for thirty (30) days after receipt by the breaching party of a written notice specifying the breach. In addition, the Company may terminate this Agreement immediately if Contractor has : (a) not fulfilled the obligation of Services at Company's sole discretion ; (b) not met any deadlines as

submitted in writing or via electronic mail by Company ; (c) filed a voluntary petition for bankruptcy, or sought to effect a plan of liquidation or reorganization. Further, the Company may terminate this Agreement for any reason without notice or further obligation to Contractor.

6. *Confidentiality; Unfair Activities.*

(a) Confidential Information. Contractor acknowledges that during the term of this Agreement, Contractor will have access to and become acquainted with proprietary trade secret information belonging to the Company and its parent, subsidiaries, affiliates, clients and customers, including, without limitation, information concerning their organization, business and affairs, client/customer lists, member lists, supplier lists, pricing information, profit margins, referral source lists, vendor services lists, client presentations (actual and proposed), sales and financing projections, budget information and procedures, accounting and financial records, policy and procedure manuals, industry contracts, computer software, computer programs, techniques of operation, employee compensation and financial structure, strategies of any kind or nature, and marketing, promotion, development or acquisition plans (whether past, current, future or potential) (hereinafter referred to as "Confidential Information"). Contractor acknowledges that information may be Confidential Information even though not expressly stamped or identified as such, and that Contractor shall treat all information in the general categories identified above as Confidential Information. Contractor further acknowledges that Confidential Information is highly confidential, a valuable trade secret, and the sole property of the Company and its parent, subsidiaries, affiliates, clients and customers, as the case may be, and that the protection and preservation of Confidential Information by Contractor is absolutely vital to the continued success of the advertising, marketing and promotional services business of the Company, and the preservation of the trust of its clients and customers. Accordingly, Contractor shall not disclose, reveal, or divulge to any person any Confidential Information or other trade secrets, directly or indirectly, or use them in any way, except as required in the course of Contractor's engagement under this Agreement.

(b) Return of Materials. Upon termination (for any reason) of Contractor's engagement, or at any other time the Company demands, Contractor shall deliver promptly to the Company (or destroy upon written notice of the Company given in its sole discretion) all property, materials and documentation (whether in tangible or electronic, digital, magnetic or other form) relating to or belonging to the Company or its clients, including without limitation, all memoranda, notes, records, reports, manuals, drawings, blueprints, employee lists, customer lists, referral source lists, vendor service lists, software programs, Works (as defined below in this Agreement), and any other documents, whether or not of a confidential nature, belonging to the Company, including all copies of such materials which Contractor may then possess or have under Contractor's control (collectively referred to as "Company Property"). Contractor further agrees that upon expiration or termination (for any reason) of Contractor's engagement, Contractor shall not retain any document, data or other materials containing or pertaining to the Confidential Information or Company Property.

(c) Ownership of Materials. All artwork, articles, blueprints, materials, memoranda, reports, research, software, programs, promotions, compilations, designs, drawings,

layouts, models, patterns, inventions, ideas, formulas, procedures, processes, concepts, discoveries, designs, methods, improvements or any other works, created or developed by Contractor (or on behalf of Contractor) pursuant to Contractor's engagement by the Company (whether alone or in conjunction with any other person, and regardless of form) (collectively, the "Works") shall be the sole, exclusive and absolute property of the Company for any and all purposes whatsoever, and Contractor hereby assigns to Company all Contractor's right, title and interest in and to the Works (including, without limitation, any copyright, trademark, patent or other intellectual property right therein). Contractor further agrees that Contractor does not have, and will not claim to have, any right, title or interest of any kind or nature whatsoever in or to such Works. To the extent applicable, each such Work shall be deemed a "work made for hire" under the United States Copyright Act and other applicable copyright laws, and Contractor further agrees to execute any and all documents reasonably required by Company in order to evidence or perfect Company's ownership of such Works, and the copyrights, trademarks, patents or other intellectual property rights therein. In addition to its other rights, the Company shall have the exclusive right to register with the United States Copyright Office, United States Patent and Trademark Office and similar agencies worldwide the copyright, patent, trademark, trade secret or similar right in all such Works in its name in accordance with the requirements of applicable law.

(d) **Non-Solicitation and Hire Away.** Contractor agrees that it will not, at any time during and for a period of six (6) months after the engagement with the Company, directly or indirectly (i) solicit or take away any current client of the Company. Contractor agrees that it will not hire away or attempt to hire away, either directly or through any other person or entity, any employee of the Company during the term of this Agreement, and for a period of one (1) year thereafter. In the event of any breach of this provision, and in recognition of the costs incurred by the Company in training its employees and replacement employees, Contractor shall pay the Company a single sum equal to one (1) year's salary for any employee hired away.

(e) **Injunctive Relief.** Contractor hereby acknowledges and agrees that, in the event that Contractor shall violate any provisions of this Paragraph 6 or Paragraph 9, the Company will be without an adequate remedy at law and, accordingly, will be entitled to enforce such restrictions by temporary or permanent injunctive or other mandatory relief obtained in any action or proceeding, without the necessity of proving damages or posting bond, and without prejudice to any other remedies which it may have at law or in equity.

(f) **Blue Penciling.** In the event that any of the provisions of this Paragraph 6 shall be adjudicated to exceed the time, geographic or other limitations permitted by applicable law in any jurisdiction, then such provision shall be deemed reformed in any such jurisdiction to the maximum time, geographic or other limitations permitted by applicable law.

7. ***Independent Contractor.***

(a) It is expressly understood and agreed that Contractor is an independent contractor, that Contractor shall not be deemed to be the agent or employee of the Company or of any of its affiliates, subsidiaries or parents for any purpose whatsoever, and that, except to the extent authorized by the Company, Contractor is not hereby granted any right or authority to assume or create any obligation or

liability express or implied on behalf of or in the name of the Company or any of its affiliates or to bind the Company or any of its affiliates in any manner or thing whatsoever. Nothing in this agreement shall be construed as creating an employer-employee relationship, or as a guarantee of a future offer of employment.

(b) Both parties acknowledge that Contractor is not an employee for state or federal tax purposes, that Contractor shall be responsible for all of its own federal and state taxes, withholding social security, insurance, and other benefits. Without limiting the foregoing, neither Contractor, nor anyone acting on its behalf, shall be eligible to participate in any of Company's employee benefit programs, including but not limited to, any bonus, pension, profit sharing, stock option, 401 (k), health, sickness, dental, accident, life, disability, retirement, severance, vacation and other paid time off, tuition benefits, deferred compensation or insurance which Company may maintain for the benefit of any of its employees, even if Contractor or such other person is determined to be a common law or statutory law employee of Company. In addition, neither Company, nor anyone acting on its behalf, shall be entitled to unemployment benefits in the event this Agreement terminates, or workers' compensation benefits in the event Contractor or such person is injured in any manner while performing services hereunder, even if Contractor or such other person is determined to be a common law or statutory law employee of Company.

8. *Indemnity.* Contractor agrees to indemnify, defend, and hold harmless the Company, its officers, directors, shareholders, affiliates, employees, agents, successors and assigns against any and all costs, claims, demands, suits, actions, causes of action, liabilities, losses, and expenses (including without limitation reasonable attorneys' fees) (collectively, "Claims") arising from: (a) Contractor's breach of any material obligation or representation under this Agreement; (b) Contractor's failure to comply with any applicable laws, rules or regulations; (c) any negligence or willful misconduct of Contractor; (d) Contractor's unapproved, unauthorized or improper use of the Company Property (including any Confidential Information or Works) and/or Client Property (as defined below); (e) any claim that any of the information, materials or rights provided by Contractor hereunder, or the use thereof by the Company or its clients pursuant to this Agreement, infringe a patent, trademark, copyright, trade secret, privacy, publicity or other proprietary or civil right of a third-party; or (f) any actual or alleged defects, negligence in manufacture, or other problems in any material or services supplied by Contractor or its agents, contractors, suppliers or vendors. The indemnification obligations of this Paragraph 8 shall survive the termination of this Agreement.

9. Intellectual Property Rights; License; Infringement.

(a) The Company hereby grants to Contractor a royalty-free, nonexclusive license to use, in connection with the services and materials to be provided by Contractor hereunder, the Company's trademarks, trade names, copyrights, patents, trade secrets, color combinations, logos, insignias, product artwork and devices under its control related thereto (the "Rights") Such use shall be: (i) limited to the term of this Agreement; (ii) solely for the purpose of Contractor's performing its obligations under this Agreement; and (iii) subject to advance written approval by the Company (after presentation to the Company of detailed layouts and copies, in a form acceptable to the Company, for any such proposed use of the Rights). Contractor acknowledges that this provision shall not convey title or any ownership interest in or to the Rights, all of which shall be retained as the sole and

exclusive property of the Company. Furthermore, Contractor will not provide, disseminate, distribute or sell any materials or products of any kind making use of or bearing any manifestation of the trademarks, trade names, service marks, certification marks, copyrights, patents, trade secrets, color combinations, logos, insignias, slogans or product artwork of the Company's clients (the "Client Property") without obtaining the advance written consent of the Company (after presentation to the Company of detailed layouts and copies, in a form acceptable to the Company, for any such proposed use of the Client Property).

(b) Contractor warrants and represents that, unless indicated otherwise when presented, services, information, materials, copy, designs and layout produced by Contractor pursuant to this Agreement shall not infringe the copyright, patent, trademark, trade name, trade secret, publicity, privacy or any other proprietary or civil right of any third party.

10. *Entire Agreement; Amendment.* This Agreement sets forth the entire understanding of the parties with respect to the subject matter hereof, and no statement, representation, warranty or covenant has been made by either party except as expressly set forth herein. This Agreement supersedes and cancels all prior agreements between the parties, whether written or oral, relating to the Services of Contractor. No amendment or alteration of the terms of this Agreement shall be valid unless made in writing and signed by the parties hereto.

11. *Miscellaneous.*

(a) This Agreement may not be transferred or assigned by either party without the prior written consent of the other party.

(b) All of the terms and provisions of the Agreement shall be binding upon and inure to the benefit of and be enforceable by the respective heirs, personal representatives, successors and assigns of Contractor, and the successors and assigns of the Company.

(c) This Agreement shall be governed by the laws of the State of Texas without regard to its conflict of law provisions. All disputes arising out of or relating to this Agreement may only be brought in the state or federal courts located in Travis County, Texas, and the parties hereby agree and submit to the personal and exclusive jurisdiction and venue of these courts.

(d) If any provision of this Agreement shall be held by any court to be illegal, void or unenforceable, such provision shall be of no force and effect, but the illegality or enforceability of such provision shall have no effect upon and shall not impair the enforceability of any other provision of this Agreement.

(e) This Agreement may be executed in one or more counterparts, all of which together shall constitute one and the same instrument.

(f) No failure or delay on the part of either party in exercising any right, power or remedy under this Agreement shall operate as a waiver of such right, power or remedy nor shall any single or partial exercise of any such right, power or remedy operate as a waiver.

(g) Any notice, request, instruction or other document to be given hereunder by a party shall be in writing and delivered personally or by messenger or overnight courier, sent by registered or certified mail, return receipt requested, or sent by facsimile (with a copy and confirmation of facsimile transmission sent by registered or certified mail), addressed to the parties as follows:

If to Company: Rooster Teeth Productions, LLC
 1901 E. 51st St, Box 20
 Austin, TX 78723

If to Contractor: (Complete name and address)

Vic Mignogna

4711 Taylor Lane
Grapevine, TX 76051

or such other person or address as may be designated in writing by the party to receive such notice. If mailed as aforesaid, the day of mailing shall be the date of delivery.

IN WITNESS WHEREOF, the parties hereto have duly executed this Agreement as of the date and year first written above.

Rooster Teeth Productions, LLC

Koen Wooten 12/6/18
Signed by: Date

CONTRACTOR
Vic Mignogna 12/4/18
Signed by: Date

EXHIBIT "A"

A. Description of Services. The role of Contractor will be, without limitation, to:

Contractor will provide vocal performance or "voice over" services, performing scripted dialogue provided by the Company either at a Company facility or another recording studio approved by the Company.

B. Contract Period.

1. The services of the Contractor are expected to be provided under this contract from:

11/30/18 through 04/30/19

2. Contractor understands that Contractor's services may be terminated at any time with no obligations or payment due to Contractor other than for services already rendered.

C. Description of Compensation.

1. In consideration for Contractor's services and performance under this Agreement, the Company shall pay Contractor as follows:

Contractor will provide Services, compensated at the following rates:

* \$700 per session

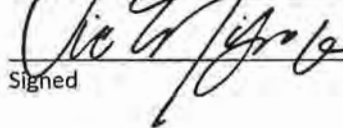
2. Contractor shall be entitled to overtime equal to time and one-half the secondary rate for the fifth and sixth hours and double the secondary rate for any hours in excess of six (6).

3. Payment will be processed based on invoices and/or Day Rate Sheets submitted to the Company at the end of each week during the term of the Agreement with appropriate back up and documentation (the "Contractor Fee"). The Contractor Fee is payable within 30 days of the Company's receipt of the weekly invoice and/or Day Rate Sheet.

4. Contractor shall provide the Company with detailed invoices along with appropriate back up with regards to all billings, or with properly completed Day Rate Sheets approved by the designated Company representative.

5. Company will not be responsible for payment to Contractor if invoices and /or Day Rate Sheet are not submitted with 45 days of end of contract period.

Contractor Name: Vic Mignogna


Signed

12/4/18

Dated

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

V.

FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI

Defendants.

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IN THE DISTRICT COURT

141st JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

**MONICA RIAL’S AMENDED OBJECTIONS AND RESPONSES TO PLAINTIFF’S
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION**

TO: Plaintiff, Victor Mignogna, by and through his attorney of record, Ty Beard, Beard Harris Bullock Hughes, 100 Independence Place, Suite 101, Tyler, Texas 75703.

Pursuant to the Texas Rules of Civil Procedure, Defendant Monica Rial (“Rial”) serves the following amended objections and responses to Plaintiff’s First Interrogatories and Requests for Production (“First Discovery Requests”).

Cowles & Thompson

By: /s/ Casey Erick
Casey S. Erick
State Bar No.: 24028564
901 Main Street, Suite 3900
Dallas, Texas 75202
Email: cerick@cowlesthompson.com

and
Andrea Perez
State Bar No.: 24070402
Email: aperez@kesslercollins.com
Kessler Collins, P.C.
2100 Ross Avenue, Suite 750
Dallas, Texas 75201
Tel. (214) 379-0732
Fax. (214) 373-4714

ATTORNEYS FOR DEFENDANTS

MONICA RIAL AND RONALD TOYE

CERTIFICATE OF SERVICE

I certify that on June 21, 2019, a true and correct copy of the foregoing document was served on Plaintiff's counsel by electronic service in accordance with Texas Rule of Civil Procedure 21a.

/s/ Casey Erick

Casey S. Erick

I.
OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. The following Responses, while based on diligent investigation by Defendant and Defendant's counsel, are necessarily supported only by those facts and writings presently and specifically known, and readily available. Defendant has not completed her investigation of the facts related to the subject matter of this action, discovery, or her preparation for trial. Defendant, therefore, makes these Responses without prejudice to her right to produce at any stage of these proceedings, including at trial, evidence of any facts or information that Defendant may later discover. Defendant further reserves the right to change, amend, or supplement her Responses with facts, information, or documents she may discover that were omitted by inadvertence, mistake, or excusable neglect, and as additional facts are ascertained and contentions are made in this litigation.

2. Defendant's Responses and objections herein are made without waiving or intending to waive: (a) any objections as to the competency, relevancy, materiality, privileged status, or admissibility as evidence, for any purpose, of any documents or information provided in response to the First Discovery Requests (or other subsequent discovery requests); (b) the right to object on any ground to the documents or information produced in response to the Interrogatories at any hearing or trial; or (c) the right to object on any ground at any time to a demand for further responses to the First Discovery Requests. All such objections and grounds are expressly reserved and may be presented as appropriate throughout this dispute. Moreover, no incidental or implied admissions are intended by the Responses below.

3. Defendant objects to all definitions, terms, and instructions to the extent that they misstate or mischaracterize the relationship between Defendant and any persons or entities, and attempt to impose any burden upon Defendant greater than that required by the Texas Rules of Civil Procedure. Defendant will comply with the Texas Rules of Civil Procedure and any applicable court orders or local rules of Tarrant County in responding to the First Discovery Requests.

4. Defendant objects to the First Discovery Requests to the extent that they seek disclosure of information or documents protected by the attorney-client privilege, the attorney work product doctrine, the party communications privilege, the investigative privilege, or any other applicable privileges or exemptions from discovery, including those relating to documents prepared in anticipation of litigation or in preparation of trial. Defendant's communications with its attorneys are privileged and fall outside the bounds of permissible discovery.

5. Defendant objects to the First Discovery Requests to the extent any specific Request or Interrogatory seeks information concerning trade secrets, confidential and/or proprietary information, or other sensitive information.

6. Defendant objects to Interrogatories or Requests that utilize capitalized terms that fail to have specified definitions or appropriate reference points as vague and ambiguous.

7. To the extent any document is responsive to more than one Request, duplicate copies will not be produced.

8. The specific responses and objections below are expressly made subject to the preliminary objections.

II.
OBJECTIONS AND RESPONSES TO
INTERROGATORIES

INTERROGATORY NO. 1. Identify all persons who assist or participate in the answering of interrogatories served on you in the above-numbered cause of action.

ANSWER: Defendant objects to this Interrogatory because it seeks privileged information.

Subject to, and without waiving, the aforementioned objection, Defendant answers as follows:

- Defendant and Defendant Toye.

INTERROGATORY NO. 2. Identify each instance when Plaintiff took “a fist full of [your] hair, [pulled your] head back, and either whisper[ed] so closely to [your] ear that his lips were touching or kiss [your] cheek/neck” as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- The conduct described happened too many times for Defendant to clearly recall the specific date of each occurrence.
- The first such occurrence took place in late 2000 or early 2001 during a dinner with Plaintiff at Cafe Adobe on Interstate 10 in Houston, Texas.
- Since that first dinner, Plaintiff has exhibited the described behavior too many times to count.
- The most recent incident in which Plaintiff exhibited the described behavior was at Louisville Supercon in Louisville, Kentucky, which took place between November 30th and December 2nd 2018.
- On December 1, 2018, Plaintiff grabbed the back of Defendant’s neck (Defendant’s hair was not long enough at the time to collect it in Plaintiff’s fist, as in previous incidents), and whispered into Defendant’s ear with his lips touching Defendant’s ear. Plaintiff exhibited the described behavior in front of waiting fans, guaranteeing that Defendant could not resist, or risk making a scene in front of Defendant’s fans.
- It is impossible to recount all of the times Plaintiff has exhibited the described behavior, because it has become a regular occurrence for Defendant and other women who attend conventions.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 3. Identify all persons who witnessed the incidents identified in your answer to Interrogatory No. 2.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff has exhibited the described behavior too many times to recount, and in front of too many people to recall.
- Plaintiff exhibits the described behavior without warning, in private or in public, and often in front of unknown fans in order to prevent his victims from resisting or causing a scene.
- Defendant has personally spoken with fans following incidents, but Defendant cannot know all such people, or be able to contact all such witnesses.
- For example, following the incident at Louisville Supercon described in Defendant's response to Interrogatory No. 2 above, a male fan witnessed Plaintiff exhibiting the described behavior, and inquired whether Defendant would like for the male fan to confront Plaintiff about the inappropriate behavior. It is impossible to know how many other fans have witnessed this conduct.
- *See also* Toye's Amended Objections and Responses to Plaintiff's First Interrogatories and Requests for Production, and Documents Bates labeled TOYE 000001-000042, attached thereto.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 4. Identify the instance in "the mid-2000s"—including the name of the convention—when Plaintiff "grabbed [you] and kissed [you] in his hotel room" as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it seeks information that is in the possession of Plaintiff and equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff grabbed and kissed Defendant without Defendant's consent on Sunday, November 4th, 2007 while Plaintiff and Defendant were both attending Izumicon in Oklahoma City, Oklahoma.
- After several other guests had left Oklahoma City, Stan Dahlin, one of the convention chairmen, invited Plaintiff and Defendant to dinner. Plaintiff requested that Defendant accompany Plaintiff to Plaintiff's hotel room to view Plaintiff's fan film called "Fullmetal Fantasy." Mr. Dahlin stated that he would collect us both for dinner from Plaintiff's hotel room.

- Plaintiff played the video as promised while Defendant stood to watch the video. But Plaintiff soon grabbed Defendant by the upper arms and began aggressively kissing Defendant. Defendant attempted to resist, but Plaintiff physically restrained Defendant and pushed Defendant backward toward the bed. Plaintiff climbed on top of Defendant and held her down as he continued to aggressively kiss Defendant.
- Plaintiff continued in this fashion for several minutes, despite Defendant's fear and shock, until Mr. Dahlin knocked on Plaintiff's hotel door. Plaintiff left Defendant on the bed, and hurriedly answered the door. Mr. Dahlin inquired whether Defendant was ok, clearly noticing distress. Defendant, however, was too shocked and afraid to admit to what had occurred.
- Following dinner, Plaintiff forced Defendant to speak with Plaintiff's longtime fiancée on the telephone, and Plaintiff spoke with his fiancée as if nothing had happened.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 5. Identify all persons who witnessed the incident identified in your answer to Interrogatory No. 4.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Plaintiff waited until Defendant was away from the many other guests and friends who attended the convention before he forced himself upon Defendant. Several guests and friends noticed Plaintiff's behavior leading up to this incident, but other than Mr. Dahlin, Defendant cannot know who may have known about Plaintiff's intentions.
- *See also* Toye's Amended Objections and Responses to Plaintiff's First Interrogatories and Requests for Production, and Documents Bates labeled TOYE 000001-000042, attached thereto.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 6. Identify the "three of [your] close friends" who "came forward" and "shared their stories with [you]" after "the premiere for the Broly movie" as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it seeks to have Defendant prematurely marshal all of her evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff. Defendant further objects to this Interrogatory because it assumes facts not in evidence.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- As Plaintiff stated in his communication through Twitter on February 8, 2019, “there have been threats made toward others by fans in support of [Plaintiff].” In order to ensure that such threats are not made toward other witnesses in this litigation, Defendant proposes a Rule 11 Agreement with counsel for Plaintiff. The Rule 11 Agreement will state that Defendants will provide identifying information solely to counsel for Plaintiff, or *in camera* if to the Court. Plaintiff’s counsel agrees that none of the information so proffered will be shared publicly unless and until the information is to be used in a public pleading or argument in this matter. Defendant will provide the information requested in this Interrogatory once the Rule 11 Agreement is on file with the Court.
- *See also* Toye’s Amended Objections and Responses to Plaintiff’s First Interrogatories and Requests for Production, and Documents Bates labeled TOYE 000001-000042, attached thereto.
- *See also* RIAL 000001-112.

INTERROGATORY NO. 7. Identify the “investigators” with whom you “chose to share [your] testimony” as you alleged in the tweet you posted to @Rialisms on February 19, 2019.

ANSWER: Defendant objects to this Interrogatory because it assumes facts not in evidence. Defendant further objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Tammi Denbow
Executive Director, Employee Relations
Sony Pictures Entertainment
- *See also* RIAL 000001-112.

INTERROGATORY NO. 8. Identify the date you first met Plaintiff.

ANSWER: Defendant objects to this Interrogatory because it seeks information that is in the possession of Plaintiff, may be publicly accessible, and/or equally accessible to Plaintiff.

Subject to, and without waiving, the aforementioned objections, Defendant answers as follows:

- Defendant believes that she met Plaintiff in 2000 at a screening of Gasaraki.

INTERROGATORY NO. 9. Identify all email addresses, including respective domain names (*e.g.*, @aol.com, @gmail.com), you have used between (a) the more recent of (i) the date you first met Plaintiff or (ii) January 1, 2014 and (b) the present.

ANSWER: Defendant objects as this Interrogatory is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as the Interrogatory seeks information that is unrelated to the claims in this lawsuit in both scope and time. Moreover, Defendant objects to the relevance of Defendant’s email addresses, and the safety of disclosing any additional addresses absent the Rule 11 Agreement described in response to Interrogatory No. 6.

6/22/2019



Vic rant: Enter at your own risk.: noroki_girl



MOOD:

aggravated



Noroki-chan
[noroki_girl](#)

<https://noroki-girl.livejournal.com/>
2010-04-20 05:28:00

Vic rant: Enter at your own risk.

By now, everyone pretty much knows my feelings toward Vic Mignogna. I don't dislike him for his job so much for his actions. I was even on the verge of reconsidering, but he's pulled some moves recently that stir the fire all over again.

A post on a not-so-respected forum:

"Sorry for the slight necro, but I have news. Vic attended Tekkoshocn this weekend, and he held a rumors panel.

Yes... a rumors panel. After reading the description, my friends and I immediately knew what it would be about, and couldn't believe that he was holding a panel to talk about his issues. So we went... and god was it bad. He started off by saying this was a one-time thing, a panel to address the rumors on cosfu and 4chan.

Two of my friends left then. Vic started out by rambling on and on about how much rumors hurt and how hurt/angry he is about the rumors about himself. He then launched into a discussion (guided by his lpod touch or whatever it was) of all the 'rumors' that cosfu and 4chan said.

First he started off with the rumor that he was going to quit voice acting and become a minister. Vic rambled on about how he thinks the world is his church or something, and that he is not quitting voice acting.

The next rumor was about his hate for yaoi and his homophobic tendencies. This turned into a rant about how he's so willing to sign things for fans but refuses to sign yaoi... basically he tried to disprove/talk about everything cosfu's said. He also said that he isn't homophobic and can't be homophobic because 'God loves those people, and since God loves them, I must love them too'. My remaining friend brought up a good point- just because your religion says you must love someone/something, doesn't mean that you do. So... he didn't really accomplish his goal in disproving a rumor... he just perfected dancing around the issue.

6/22/2019

Vic rant: Enter at your own risk.: noroki_girl

Next rumor- drunk Vic. He sat and said that he's never been drunk, that he's never even tasted beer.... only to say in his next sentence that he's had sips of beer and a glass or so of wine with dinner. Um... yeah. Granted... that's not falling over drunk, but if you're gonna say you don't drink, you better not say right after that you drink wine with dinner. Vic also reveals that he encouraged Britt and her friends to attack cosfu and 4chan about these stories... and that HE set up the PayPal account, which demanded video proof of Vic being drunk in exchange for \$100. Britt was shown as a victim because of anonymous getting her passwords and such, and then encouraged his fans to attack cosfu, 4chan and any other rumor spreading sites and to tell them the truth about Vic.

The next thing Vic addressed was anger toward fans, like how he'll get up and leave a session or something. I'm honestly not too sure what he was talking about; it sounded like how he reacts to yaoi at one point, and at another point it sounded like a different thing. It probably didn't help that my friend and I were starting to get a little creeped out by the Rangers, and were receiving death glares from a few of the ones around us who heard us laughing at Vic. He then started talking about rumors that he hates other voice actors, and that he's too demanding of fans/conventions. I'm sorry that I can't offer much more information on this, blame the Ranger's who were going to faint cause they were in the same room as Vic.

Another rumor... or statement was the fact that Vic likes to push his faith on others. He asked in the panel for people to raise their hands if they felt that he had pushed his faith onto them'. Of course, no one raised their hand... because it's a VIC panel! At this point in the panel, he had mentioned his faith at least 10 times, and had said 'God loves you, I love you... etc.' a good 5-6 times. My friend said that while he's not pushing his faith on others... he's making it seem like it's a big deal or some controversial issue, and it's not. Religion doesn't really matter... but if you're so willing to mention your faith, or hold Sunday services at cons, then... you need to tone it down a bit.

Another rumor/story he addressed was CLAMP, and how someone at FUNimation asked about the relationship between Fai and Kurogane when they were at a convention. Vic tried to pass this off in the end as, 'it's just a cartoon' and 'I'm making the anime not the manga, so it doesn't matter what their relationship is in the manga'. At this point, my friend and I started to tune Vic out and just make fun of him... because he wasn't making much sense. Yes, manga and anime are different... but it's the same basic plot with the same characters doing the same things no matter what the story is. If two characters have some sort of relationship in the manga, chances are they're going to have a relationship or something in the anime. It doesn't take a genius to figure that out.

Finally the panel ended, but not before Vic told everyone in the room to go on sites and tell everyone that they're wrong about him. So... if they do what he wants, they'll be here soon.

Sorry for the length... "

Don't promote trolls and raids, please. While you may feel hurt and some things could be better said, yes, that really doesn't mean you should encourage fans to raid these places and cause more wars online. It just makes everyone involved that much irate and angry.

<https://noroki-girl.livejournal.com/31958.html>

2/7

6/22/2019

Vic rant: Enter at your own risk.: noroki_girl

And so that there's no bias on my statements and this quote, there's a 9-part video of the panel on YouTube.

Part one [available here](http://www.youtube.com/watch?v=x2mLZJoGCPk&feature=related) (<http://www.youtube.com/watch?v=x2mLZJoGCPk&feature=related>), with links to the rest.

This quote pretty much sums up my feelings:

"He obviously hasn't realized that's how rumors start in the first place. One person, perhaps the person the rumors are about, says one thing to another person. It could be very well-meaning or a passing thought. Either that person talks to one of their friends about it, or it's overheard and misheard/misinterpreted. Those people keep it going in a chain. Before long, it's blown entirely out of proportion. Sorry Vic, your quality control methods suck. The damage was done a long time ago when you didn't put a leash on your high school fangirls. Do you want to try cleaning up your reputation? Stop trying to appeal to them and start appealing to the rest of the fans. The ones that don't like you. Show them you are willing to clean up by your actions, not your words alone. Stop acting like you're a 14-year-old douchebag trying to get the attention of your crush. That includes glomping, snatching peoples' food, letting fangirls near your room. Stop acting like you're god's gift to humanity. Acting this way is only going to drive people away from you even more. You are human like the rest of us. Stop requesting so many panels at conventions. We would like to see guests other than you as well. I am happy to see that you are here solely for your fans, but take the rest of the world into consideration, please. People wouldn't be threatening to crash your spaces if you thought of someone other than yourself."

Rumors have some base in facts. Be the bigger man, Vic.

Okay. Rant over.

Trisha's status update:

I'm still alive. Working a lot. Miserable.

E-mail me, people. XD - shuichi_shindou192000@yahoo.com

It's long and old, but I check it the most. ♥ you guys.



18 comments

<https://noroki-girl.livejournal.com/31958.html>

3/7

6/22/2019

Vic rant: Enter at your own risk.: noroki_girl



[squidflakes](#)

[April 20 2010, 16:29:48 UTC](#)

[COLLAPSE](#)

Yeah, Vic is an obnoxious self-aggrandizing prick. His whole auctioning off a kiss thing at Oni-con 2008 really sealed it for me. The guy is ridiculous and I wouldn't be surprised to learn he enjoys the rumors because that means people are talking about him.



[noroki_girl](#)

[April 24 2010, 05:03:32 UTC](#)

[COLLAPSE](#)

Yeah. He was all smug about being filmed.



[deaths_guardian](#)

[April 20 2010, 17:42:51 UTC](#)

[COLLAPSE](#)

WTF Vic stop doing shit to get attention of the bad kind. And yeah totally agree with [squidflakes](#) that stunt at Oni-con was ridiculous I really wanted to see that guy win that jacket though, I was rooting for him XDb



[noroki_girl](#)

[April 24 2010, 05:03:56 UTC](#)

[COLLAPSE](#)

That would've been awesome.



[daikenkai](#)

[April 20 2010, 19:12:58 UTC](#)

[COLLAPSE](#)

oh good lord, Vic is disgusting. I already thought that before, but I think it even MORE now. why the fuck would you hold a panel about rumours?! that's just ridic. Rumours are just RUMOURS. They rarely ever have truth to them, so he should have kept his mouth shut.

I hope that some con official sees this disgusting display of a panel and bans him from cons. All he fucking cares about is the Riseembool Rangers, anyway. :!

Vic, do us all a favor and go DIAF.



[noroki_girl](#)

[April 24 2010, 05:13:25 UTC](#)

[COLLAPSE](#)

Most of them are like...13 anyway. PDA with them is a form of pedobear disease, man.

<https://noroki-girl.livejournal.com/31958.html>

6/22/2019

Vic rant. Enter at your own risk.: noroki_girl



[amaya_demorte](#)

[April 20 2010, 19:38:46 UTC](#)

[COLLAPSE](#)

YAY giving other god-lovin' con goers bad names. Jerk-face.

/punches with fist of GOD.

I really just wish the dude would just do his job and stfu. I mean, really.



[noroki_girl](#)

[April 24 2010, 05:16:38 UTC](#)

[COLLAPSE](#)

THANK YOU! I mean, seriously? A RUMORS PANEL? Grasping at straws to stay in the limelight, aren't we, Vic?



[comiter](#)

[April 20 2010, 23:27:51 UTC](#)

[COLLAPSE](#)

fuck i hate vic D:



[noroki_girl](#)

[April 24 2010, 05:17:17 UTC](#)

[COLLAPSE](#)

This.



Anonymous

[August 18 2014, 23:28:54 UTC](#)

[COLLAPSE](#)

Everyone should stfu! Vic is a nice guy. Explain to me why he would reply to emails, participate in con adverts, or even come to cons in the first place if he was an ass? I mean if your going to say this stuff about him without even personally knowing him, who is looking for attention again? The fact that you posted this online instead of telling him this in person just shows you have no guts and that its all lies. he even said it himself, "These are lies!" Maybe if you considered the facts you would have thought twice about saying this bullshit.



[noroki_girl](#)

[August 20 2014, 21:11:22 UTC](#)

[COLLAPSE](#)

1) If you check the date of this, it was written in 2010. I've grown up a bit.

2) I'm not sure how old you are, but your defense of him for not being an ass don't really hold up and here's why. Celebrities in Hollywood

<https://noroki-girl.livejournal.com/31958.html>

6/22/2019

Vic rant: Enter at your own risk: noroki_girl

'respond to e-mails', but it's usually PR or someone doing it for them. I'm sure he does himself. I never said he wouldn't. Coming to cons he'll do. If you read carefully, he is obsessed with his fans to a creepy level. He'd go to feed his ego, to feel important, to put his name out there. Going to a con doesn't automatically make him a saint.

- 3) He's had this stuff said to him in person. That's why he holds whole panels to 'disprove' it.
- 4) He's been caught in lies trying to prove that other people aren't lying, so that doesn't fly either. The accused coming up and saying "I didn't do it." doesn't ever, ever absolve them without evidence.
- 5) I did know him personally. The rants about him being drunk and drink actually happened at a con party my friend and I hosted. The hotel bar was that hotel bar. The one seeing him drunk was my friends and I. Everything I posted in this has been a first hand account of what I know of the guy. I volunteer at cons for security or green room work. I have met 90% of the most common guests and had to make sure they were catered to. I know Vic Mignogna.

Please, ask me, before you go off and accuse me of slander, if this was just hearsay. He's great to his fans, but he's old enough to be the father of most of them. There's a level of maturity he should carry when around them, and he's proven time and time again that he lacks a bit of it. I'm not forming an opinion on what I've heard, love. I'm forming an opinion on my personal experiences with the guy.


He's probably changed and matured since this posting. He's probably way different. I, however, still believe he has a long way to go from analyzing his personal panels. They're less about his work and more just about praising him. He has very little humility for someone in his line of work and it bothers me. There are others out there that are far worse (Richard Ian Cox, to name one).

Just know, this rant and all my points are based on facts. Maybe you should consider the facts and just be careful, please.

-Noroki

P.S. If you want to say I have no guts, that is your right. I humbly request, however, that if you do, don't hide behind anonymity to do so. My user name is not hidden in this post. It is, clearly, not private. If he wandered in here and read it, I'm not stopping him. Just make sure that you offer me the same respect and courtesy. If you want to insult and berate me, by all means, I can't prevent you from it, but the hypocrisy makes you look less credible and being anonymous takes the bite out of your words.

Anonymous 4 years ago [EXPAND](#)

 [noroki_girl](#) 4 years ago [EXPAND](#)



Anonymous
January 28 2019, 04:50:37 UTC [COLLAPSE](#)

<https://noroki-girl.livejournal.com/31958.html>

6/22/2019

Vic rant: Enter at your own risk: noroki_girl

This whole thing seems like a really libelous, abusive, harassing, bullying, inquisitorial attack on an innocent person because of hatred for a strawman interpretation of that person's religion (or bigotry against religion generally). I also see a disturbing kind of mob-mentality in play here, where even the most normal action is exaggerated far out of context and reimagined into the most perverse crimes, and, yes, that would be incredibly hurtful, so -- as mobs do -- when their victim tries to defend himself, they mock and pile on more exaggerations and fabrications, perhaps not even consciously. A character assassinating mob can take on a life of its own. It's scary, like cult repetition. I also see a lot of cultural bigotry against Mignogna's Italian heritage, with a lot of fabrications clearly based on old Anglo-American anti-Italian stereotypes, so I wonder if a lot of the negative interpretations and comments were written quite innocently by very young mob participants parroting racist and cruel things they may have heard their grandparents say about Italians and Italian-Americans. A picture speaks a thousand lies. I really don't like this horribly hypocritical dimension of the Culture. Anime fans used to be the most tolerant people. Fans got along from around the world and built a global community because the world of games and anime were more open and accepting, and we felt it was far beyond this kind of negativity. I'm just very very disappointed to see this kind of "guilty until proven innocent", "rumors must have a basis in truth" attitude. Thinking that way is the essence of bully culture, the antithesis of everything I felt anime fans and gamers ever stood for.



[noroki_girl](#)

[January 29 2019, 23:49:23 UTC](#)

[COLLAPSE](#)

Did....did you check the date on this? This is almost 9 years old.

I'm not a part of this community anymore and don't even know what Vic is doing at the moment. This was written after personal experiences at several cons and I was also young and stupid.

You speak of bully culture, but you went on anon to post a paragraph on a nearly decade old post to tell me how wrong my personal, actually lived it experiences are.

[noroki_girl](#) 4 months ago

[EXPAND](#)



[Almost 10 years later..](#)

[Demonskid](#)

[February 6 2019, 01:00:02 UTC](#)

[COLLAPSE](#)

10 years later, this post of yours is being linked due to Vic being accused of sexual harassment and other allegations. They're using it as proof that people have complained about him and told horror stories way before the current allegations started. Be prepared for more stuff like that other poster.



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April 12, 2019

**VIA Certified Mail (7017 1450 0000 6520 0435) and Email
(mymarchi@gmail.com)**

Jamie Marchi
9411 Timberleaf Drive
Dallas, Texas 75243-6123

RE: Vic Mignogna; Request for correction, clarification, or retraction pursuant to Texas Civil Practice & Remedies Code ("CPRC") §§73.052 et seq.

Dear Ms. Marchi:

As you are aware, my firm, Beard Harris Bullock Hughes, has been retained to represent Mr. Vic Mignogna regarding false, misleading and unsubstantiated statements about him represented as fact. This is a demand specifically relating to the publication of status posts and "tweets" via your personal social media accounts including @rontoye containing statements that defame Mr. Mignogna.

The bullet list below sets forth examples of your online statements that defame Mr. Mignogna.

- On February 6, 2019 at 9:05 p.m. on Twitter, you stated, "Yes, I want his head. I want his balls. I want him to feel an ounce of the pain he's cause others and then fucking choke on it. I want you to take his dick out of your ears so you can actually hear reality. But, you know, that's just me." This statement is not only defamatory and false but purely malicious. You have not personally witnessed any of the alleged incidents that you claim Mr. Mignogna committed to cause pain to

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900

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others. You imply he has committed some type of criminal offense worthy of castration yet have zero facts to validate what led to this threatening, hateful tweet you made toward another human being.

- The Twitter statement on February 8, 2019 at 3:50 p.m. where you told, “Your story” is attached due to the lengthy nature of this tweet. The defamatory parts of this tweet include the statement that “he gave almost all the women at my job the creeps.” Clearly false as he had been working at this company for 15 years and had friends. Your claim that he whispered something “sexual in nature” to you is purely fantasy and is false because you can’t remember what he said. You imply that he yanked your head backwards which implies he committed some type of crime and as you put it “his actions qualify as simple assault.” You emphatically state that he committed a crime, which is defamatory and false. You indicate half a dozen women you personally know came forward with accounts, yet you never witnessed a single “account” personally to be able to comment, which means this statement is false. Furthermore, you call Mr. Mignogna “a predator.” This is defamatory and false because there has never been a criminal action against Mr. Mignogna where a court determined that he was a predator to anyone. This just implies that he is the worst kind of criminal and he clearly, as evidenced by thousands of fans who respect and admire him, is not the truth.
- On February 7, 2019 at 12:32 a.m. you tweeted, “What would Jesus do? Light him on fire and send him to hell.” This statement besides being blasphemous is defamatory and it too is false. There is not a single place in the Bible where Jesus states that he would “light someone on fire and send him to hell.” Jesus spread the message of love for everyone, not vindictiveness and defamation.
- The Twitter statement in the same thread as the previous tweet’s state, “Fighting back does not, in any way, shape or form, make me as bad as Vic.” This statement is defamatory and false because Mr. Mignogna, is not a bad person, but you imply that he is a bad person akin to a criminal.

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

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7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900



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These specific statements published by you are defamatory because they allege that Mr. Mignogna has committed sexual assault and is a sexual predator, and they go so far as to endorse these allegations as being based on truth, even though no inquiry was ever made into the truth or falsity of those allegations in a forum designed to seek the truth. This campaign that you are championing against Mr. Mignogna has resulted in loss of employment by Mr. Mignogna and Mr. Mignogna having numerous conventions cancel convention appearances by Mr. Mignogna.

Demand is made that you immediately cease disparaging and defaming Mr. Mignogna to anyone in any manner. Further, demand is hereby made that you immediately remove any defamatory or disparaging comments posted anywhere on the internet, including Twitter, Facebook, the ANN website, Tumblr, and YouTube to include all Twitter posts attached to this letter. Demand is further made that you publish a retraction of these defamatory statements.

Please be aware that Mr. Mignogna takes this matter very seriously and failure to immediately comply with this demand will result in a lawsuit. Mr. Mignogna will use any and all means available to him under the law and/or in equity to protect his rights. This includes, but is not limited to, seeking the recovery of actual monetary damages and punitive damages suffered as result of the canceled conventions, contracts, future contracts and the loss of earnings. Based upon what currently exists, we believe that Mr. Mignogna has claims against you individually for defamation, defamation per se, tortious interference with contract, business disparagement, and intentional infliction of emotional distress.

You are under a continuing obligation to preserve the requested data related to Vic Mignogna that exists or may come into existence after the date of this letter.

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900



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Thank you for your attention to this matter. Please confirm receipt of this notice and intention to comply. If you have any questions or concerns regarding anything contained in this letter, please feel free to contact myself or Beard, Harris, Bullock & Hughes.

Sincerely,

Ty Beard

Cc: Client

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900



Jamie Marchi

@marchimark

Follow

Replying to @AlishaNico @Rialisms

Yes, I want his head. I want his balls. I want him to feel an ounce of the pain he's cause others and then fucking choke on it. I want you to take his dick out of your ears so you can actually hear reality. But, you know, that's just me.

9:05 PM · 6 Feb 2019

40 Retweets 664 Likes



202 40 664



Tweet your reply



matthew naico @MatthewNaico · Feb 10

Replying to @marchimark @AlishaNico @Rialisms

Someone needs to chill and memeber this isn't Salem 1692

This media may contain sensitive material. Your media settings are configured to warn you when media may be sensitive.

View

2 37



Mr. Pickle @kurogale · Feb 9

Replying to @marchimark @AlishaNico @Rialisms

What is she on about?

2 1 18



matthew naico @MatthewNaico · Feb 10

Witch hunt mostly



Jamie Marchi @marchimark

Follow

I stand with the victims. My experience is minor in comparison to many others; however, having realized this wasn't an isolated incident, I felt compelled to share.

Several years ago, I was in the lobby at my job when I was approached by a co-worker. This guy gave me the creeps already (he gave almost all the women at my job the creeps), but I always felt like I had to be nice to him anyway because of how revered he was in the industry. As we said hello, he stood to the side of me and started running his fingers through my hair. Now, I do work in an affectionate industry, we hug a lot, and on occasion, will give a kiss on the cheek. But even for an affectionate environment, this felt off. I didn't say anything to him about it, though. It was just his fingers in my hair; I didn't think it was a big deal. At that point, he splayed his fingers, put his hand at the base of my skull, and made a fist. When he did this, he grabbed my hair close to the root, effectively preventing me from moving my head at all. He then jerked his fist, yanking my head backwards and towards him, and whispered something in my ear. I don't remember what he said specifically, but I do remember it being sexual in nature. This was not normal. This was not just a hug or a kiss on the cheek. I did not like it. I have no memory of getting out of his grasp, but I assume, "What the fuck are you doing?" was part of my technique.

Afterwards, I completely and utterly dismissed it as a coincidence. I dismissed the way I had been treated as dismissed having this man grab me. I dismissed the way I dismissed the experience. I dismissed the entire experience.

I never reported this event to the company. It didn't even occur to me that I should have. Also had occurred to me, I can't say I would have reported this guy was sexually harassed by his boss. He was me by the way because of his form. He was the most popular voice actor on the convention circuit. He treated him with kid gloves because he was the only VC I'd ever met. Who was it? A nobody in com didn't matter, and I knew it. Nothing being black my work and conventions simply wouldn't have it.

Looking back on this moment and discussing it with my friends, I can see that his actions qualify as simple. Well, you'd have gone to jail had I pressed charges at work. Why would people believe me over a man's word about an event like that? And even if they did, it they care about the truth, it's not their business to know of their friend's voice actor?

A few weeks or so, I've heard accounts of his doing it (not to name a dozen other women that I personally know) and I've seen some women, and we never had a chat about our experiences. Some dismissed it. Others felt too embarrassed or scared to say anything. I just wish the guy had been having better so dramatic actions. Had I been able to speak up then, maybe he would have had to experience what happened if he was unable to get out of Vics grasp.

Looking up now because I don't even think about it until I realize other women had experienced the same thing. I thought it was just me. And at first, I didn't say anything because my experience was not as bad as what other people have suffered at the hands of men. I wanted their stories to be heard first because those are the important ones. But, in the moment, I see others who I know are out there to hear this. It was you. It's okay if you didn't say anything, to him or to me. You are not responsible for what happens. Do not have to be dismissive, ashamed, or afraid. If anyone ever goes through a similar experience, know from the start that their body is not up for sale. Their body is not property of the most popular person in the room. Their body is not a commodity, or it is, or an artifact. Their body is not a commodity that is available for the reputation and livelihood of a good

3:50 PM · 8 Feb 2019

1,332 Retweets 5,003 Likes

631 1.3K 5.0K

Tweet your reply

Shannon McCormick @sadogre · Feb 8
Replying to @marchimark
Got yr back

Justin Briner @justinbriner · Feb 8
Replying to @marchimark
Thank you for your courage. You inspire me to be stronger. ❤️

J Michael Tatum @JMichaelTatum · Feb 8

Several years ago, I was in the lobby at my job when I was approached by a co-worker. This guy gave me the creeps already (he gave almost all the women at my job the creeps), but I always felt like I had to be nice to him anyway because of how revered he was in the industry. As we said hello, he stood to the side of me and started running his fingers through my hair. Now, I do work in an affectionate industry; we hug a lot, and on occasion, will give a kiss on the cheek. But even for an affectionate environment, this felt off. I didn't say anything to him about it, though. It was just his fingers in my hair; I didn't think it was a big deal. At that point, he splayed his fingers, put his hand at the base of my skull, and made a fist. When he did this, he grabbed my hair close to the root, effectively preventing me from moving my head at all. He then jerked his fist, yanking my head backwards and towards him, and whispered something in my ear. I don't remember what he said specifically, but I do remember it being sexual in nature. This was not normal. This was not just a hug or a kiss on the cheek. I did not like it. I have no memory of getting out of his grasp, but I assume, "What the fuck are you doing?" was part of my technique.

Afterwards, I completely and utterly dismissed this experience. I dismissed the way I had been touched. I dismissed having this man grab me. I dismissed having my head jerked back. I dismissed the inappropriate comment. I dismissed this entire encounter.


I never reported this event to the company. It actually didn't even occur to me that I should have. Although, if it had occurred to me, I can't say I would have reported him. This guy was worshipped by his fans. He was worshipped by the studios because of his fans. He was the most popular voice actor on the convention circuit. Everyone treated him with kid gloves because he was the one and only Vic Mignogna. Who was I? A nobody in comparison. I didn't matter, and I knew it. Risking being blacklisted from my work and conventions simply wouldn't have been worth it.

As I look back on this moment and discuss it with my family and friends, I can see that his actions qualify as simple assault. Would he have gone to jail had I pressed charges? I'm not sure. Why would people believe me over a man who holds bible studies in hotel lobbies? And even if they did, would they care about the truth if that meant tarnishing the reputation of their favorite voice actor?

In the last week or so, I've heard accounts of him doing this exact thing to half a dozen other women that I personally know. I am friends with these women, and we never told each other about our experiences. Some dismissed it, like me. Others felt too ashamed or scared to say anything. I struggle with the guilt I feel for having been so dismissive of his actions. Had I been able to speak up then, maybe less women would have had to experience what happened when they were unable to get out of Vic's grasp.

I'm speaking up now because I didn't even think about this event until I realized other women had experienced the same thing. I thought it was just me. And at first, I didn't want to say anything because my experience was not nearly as bad as what other people have suffered at the hands of this man. I wanted their stories to be heard first because they were the important ones. But, in this moment, I want the others who I know are out there to hear this: it wasn't just you. It's okay if you didn't say anything, to him or anyone else. You are not responsible for what happened. You do not have to be dismissive, ashamed, or afraid. Also, I hope if anyone ever goes through a similar experience, they will know from the start that their body is not up for debate. Their body is not property of the most popular person in the room. Their body is not responsible for a company, or a show, or an artform. **Their body is most definitely not responsible for the reputation and livelihood of a predator.**



Jamie Marchi 
@marchimark

What would Jesus do?

Light him on fire and send him to hell.

12:32 AM · 2/7/19 · Twitter Web Client

60 Retweets **614** Likes





Mario Tainaka @SlaveOfSuzumiya · 4h ✓

I want his head, and I want him to suffer for what he did to my friend. Not just her but every other voice actor or actress he's harassed. This has been going on for over a decade he needs to face the music



JoJo [The World 🌪️] @jojo_dam... · 4h ✓

I agree that he needs to face the music but by getting angry and letting ourselves be consumed by rage towards a man who's already finished, we're no better than he is.



Jamie Marchi ✓ @marchimark · 2h ✓

I beg to differ. It's time to get angry. It's time to stand up. It's time to let our rage motivate us into making a change. Fighting back does not, in any way, shape, or form, make me as bad as Vic. That logic is why only 1 out of 3 victims come forward.



Mario Tainaka @SlaveOfSuzumiya · 2h ✓

^





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March 8, 2019

VIA CERTIFIED MAIL AND EMAIL (mymarchi@gmail.com)

Jamie Marchi
9411 Timberleaf Drive
Dallas, TX 75243-6123

RE: Vic Mignogna

DEMAND FOR PRESERVATION OF ELECTRONICALLY STORED INFORMATION

Dear Ms. Marchi:

Please be advised that Ty Beard and Beard, Harris, Bullock Hughes have been retained to represent Mr. Vic Mignogna regarding allegations of defamation, tortious interference with business relations and civil conspiracy. Please be advised that you need to protect and preserve all electronically stored data currently in your possession. This electronically stored data is an important, irreplaceable source of discovery and/or evidence in this matter. This notice requests preservation of all information from your computer systems (including hard drives), cell phone systems, PDA's, email systems, software systems, and other removable electronic media as well as the computer systems (including hard drives), cell phone systems, PDA's, email systems, software systems, and other removable electronic media which are in your possession. This includes, but is not limited to, email and other electronic communications, word processing documents, spreadsheets, data bases, calendars, telephone logs, instant messages, video files, picture files, any files associated with your google accounts, yahoo accounts or outlook accounts, text messages, internet usage files, social networking sites, and network access information. Failure to comply with this request could result in spoliation issues.

Please note that litigation is reasonably likely. Accordingly, you have a duty (even without a court order) to preserve information that is relevant to the potential dispute over termination of Vic's relationship with FUNimation and Roosterteeth and damage to his reputation and career, including, without limitation, information relating to: (i) Vic's work for FUNimation and Roosterteeth, (ii) the circumstances surrounding termination of his relationship with FUNimation and Roosterteeth, (iii) the history of, basis for, and decision to publish tweets related to Vic Mignogna since January 18, 2019, (iv) all information related to investigations by FUNimation or Sony and Roosterteeth into allegations that Vic engaged in "any kind of harassment or threatening behavior being directed at anyone" and the "testimony, proof, [and]

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900

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evidence” given therein including the investigations referenced in numerous tweets by yourself, (v) and any and all communications between yourself and FUNimation, yourself and Roosterteeth and yourself and any persons who have made allegations that Vic engaged in “any kind of harassment or threatening behavior directed at anyone” and the “testimony, proof [and] evidence” provided through said communications and (vi) any and all communications between yourself and Vic Mignogna referencing any allegations that Vic engaged in “any kind of harassment or threatening behavior being directed at anyone including yourself” and the “testimony, proof, [and] evidence” provided.

This duty extends not only to tangible items but also to electronically stored information (“ESI”). ESI should be afforded the broadest possible definition and includes, without limiting, documents, spreadsheets, presentations, calendars, diaries, communications, recordings, photographs, logs, data and databases, backup and archival files, and other data, files and records that are electronically, magnetically or optically stored on current or former computer systems and other media and devices (including cell phones, tablets, online repositories and messaging systems) used by yourself. ESI resides not only in areas of electronic, magnetic and optical storage media you may consider reasonably accessible but also in areas you may deem not reasonably accessible; your obligation to preserve potentially relevant evidence extends to both of these sources of ESI. ESI includes both system metadata (i.e., information describing the history and characteristics of other ESI) and application metadata (i.e., information that is automatically included or embedded in electronic files).

Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. You must also intervene to prevent the loss or destruction of potentially relevant ESI due to routine operations or individual actors and employ proper techniques and protocols suited to protecting ESI such as (i) initiating a “litigation hold” for potentially relevant ESI, (ii) identifying and modifying or suspending features of systems and devices that, in routine operation, cause the loss of potentially relevant ESI, (iii) securing and preserving items required to access or search ESI such as passwords, keys, and other authenticators, as well as hardware and peripherals required to access the ESI, and (iv) informing your employees, contractors, officers, directors and agents of the obligation to preserve potentially relevant ESI (and the ability to access or search same) and taking steps to prevent their hiding, destroying or altering potentially relevant ESI. Item (iv) may involve preservation of potentially relevant ESI on home or personal devices – as well as online or browser-based accounts or services – used by yourself and agents if they forwarded, created, viewed or stored potentially relevant ESI using such devices, accounts or systems.

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SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

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SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900



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Without limiting or diminishing your obligation to preserve potentially relevant ESI (or limiting or diminishing your obligation to preserve documents, tangible things and other potentially relevant evidence), you are requested to preserve potentially relevant ESI with a "created" or "last modified" date of January 1, 2017 or later.

Thank you for your attention to this matter. If you have questions or concerns, please feel free to contact myself or Beard, Harris, Bullock Hughes, during normal business hours.

Highest Regards,

Ty Beard

cc: Client

TYLER OFFICE:
100 INDEPENDENCE PLACE
SUITE 300
TYLER, TEXAS 75703
O: 903.509.4900

MARSHALL OFFICE:
115 NORTH WELLINGTON
SUITE 102
MARSHALL, TEXAS 75670
O: 903.509.4900

FRISCO OFFICE:
7460 WARREN PARKWAY
SUITE 100
FRISCO, TEXAS 75034
O: 903.509.4900

----- Forwarded message -----

From: victhewop <victhewop@aol.com>
Date: Fri, Jan 25, 2019 at 5:30 PM
Subject: Fwd: Confidential Discussion
To: Lisa Hansell <liser67@gmail.com>

Begin forwarded message:

From: "Denbow, Tammi" <Tammi_Denbow@spe.sony.com>
Date: January 25, 2019 at 7:20:44 PM CST
To: "victhewop@aol.com" <victhewop@aol.com>
Subject: RE: Confidential Discussion

Vic,

As we discussed during our previous conversation today, please do NOT reach out to either party listed below or anyone else you believe might have raised a concern, or be connected to this investigation.

Thanks,

Tammi

From: victhewop@aol.com <victhewop@aol.com>
Sent: Friday, January 25, 2019 12:33 PM
To: Denbow, Tammi <Tammi_Denbow@spe.sony.com>
Subject: Re: Confidential Discussion

just one more thing..... I hope this is acceptable to offer....

I would be more than willing to make a sincere heartfelt apology to Monica and Sara for any unintended offense. I have considered them both friends and I believed the feeling was mutual. I would have apologized at the time, but was never given any indication that anything offensive had occurred.

thanks again, sorry to bother again.

vic

-----Original Message-----

From: Denbow, Tammi <Tammi_Denbow@spe.sony.com>

To: victhewop@aol.com <victhewop@aol.com>

Sent: Fri, Jan 25, 2019 2:19 pm

Subject: RE: Confidential Discussion

Hi, Vic.

Thank you for the additional information/clarification. I will add it to my file.

Tammi

From: victhewop@aol.com <victhewop@aol.com>

Sent: Friday, January 25, 2019 11:59 AM

To: Denbow, Tammi <Tammi_Denbow@spe.sony.com>

Subject: Re: Confidential Discussion

thank you for your time, Tammi, albiet a difficult conversation.

I just wanted to reiterate a couple things....

1. Sara Bachmeyer and I corresponded via text, phone calls and in person for at least a year or more. I regularly stopped by her office while in the studio recording just to say hi. She gave me every indication that she liked me and welcomed my interest in her before I ever asked to kiss her... and she agreed. And it was a couple years ago and she has never expressed any offense then or since, so I feel that why it's coming up now is suspect.

2. My relationship with Monica has always been completely platonic. That jelly bean joke was in bad taste at worst, but it was also many years ago and it was simply quick banter meant to be funny. She and I

have done dozens of events and projects together since then and she has not only never mentioned any offense, but has treated me exactly the same as the good friends we've been for 20 years.

Additionally, many many things are said and done by voice actors at conventions in front of fans that's MUCH worse. In fact, many conventions have "after dark" panels where voice actors actually share explicitly sexual stories and profanity in front of an audience of fans. (I have never attended one because it's not who I am)

I hope you dont mind me sending you this. I just wasn't sure if I communicated those points clearly enough.

Sincerely,

vic

-----Original Message-----

From: Denbow, Tammi <Tammi_Denbow@spe.sony.com>

To: victhewop@aol.com <victhewop@aol.com>

Sent: Fri, Jan 25, 2019 11:20 am

Subject: RE: Confidential Discussion

Hi, Vic.

10 a.m. is perfect. I'll make sure I'm free at that time.

Thanks,

Tammi

From: victhewop@aol.com <victhewop@aol.com>

Sent: Friday, January 25, 2019 9:19 AM

To: Denbow, Tammi <Tammi_Denbow@spe.sony.com>

Subject: Re: Confidential Discussion

hi Tammi,

Thanks for your email. I've been expecting your call. Would it be OK for me to call you at your number listed below around 10 AM your time? It will be from my cell 713-927-3897.

Thanks,

Vic

-----Original Message-----

From: Denbow, Tammi <Tammi_Denbow@spe.sony.com>

To: victthewop@aol.com <victthewop@aol.com>

Sent: Fri, Jan 25, 2019 11:09 am

Subject: Confidential Discussion

Hi, Vic.

As Karen informed you, I need to speak with you regarding a confidential matter brought to my attention. Please do not discuss this request with others to maintain the integrity of this confidential process. My schedule is open until 2 p.m. Pacific time today. You will need privacy on your end of the call, so please plan accordingly when responding with a time you are available. Please indicate whether you would prefer to call me at the number below or if I should call you at 713-927-3897.

I look forward to speaking with you soon.

Tammi

Tammi Denbow

Executive Director, P&O

Sony Pictures Entertainment

10202 West Washington Blvd.

Culver City, CA 90232

(310) 244-2907

Tammi_Denbow@spe.sony.com

Vic Mignogna: Allegations and Supporting or Relevant Information to Those Allegations *

* recent updates in red

Allegation

Michelle @MichellMcC73

It's making me crazy how folks assume allegations against #vicmignogna are made up or blown out of proportion, due to his affectionate upbringing. Nah, y'all. I knew him before he was famous, and I AM at liberty to share my story, so why the hell not. Maybe it'll help someone.

7:46 AM - 11 Feb 2019

Read the full thread: <https://twitter.com/MichellMcC73/status/1094729435583037440>

The full Twitter thread describes Vic Mignogna as a cameraman and music video producer for Thomas Road Baptist Church, which is affiliated with private school Liberty Christian Academy, which is in turn affiliated with Vic's alma mater Liberty University. Twitter user @MichellMcC73 alleges that, while working as assistant director for Liberty Christian Academy's spring stageplay, Vic knowingly made sexual advances on her, then a student and a minor. These events allegedly occurred early in 1989, when Vic was 26** years old, in Lynchburg, Virginia.

RobinEgg

Posted 22 Oct 2017

*Every once in a while I poke around online to see if other girls experienced what I did from this creep. While he was still living in Lynchburg, VA - where he'd graduated from Liberty University - he lured me to his house under the guise of wanting to "show me a new worship video he'd produced". Next thing I knew he was shirtless and on top of me. I was 16 and stupid. He was 27** and so, SO slick. I got away, and he got away with it.*

Read Michelle's earlier blog statement about the same incident mentioned on Twitter above:

<https://prettyuglylittlear.net/topic/3255-vic-mignogna/?page=7#comment-255652>

**See below for information on Vic Mignogna's age in early 1989.

Relevant Information

- A video from **Liberty Christian Academy's** official website, showing its longstanding connection to **Liberty University** and **Thomas Road Baptist Church**:
<http://www.lcabulldogs.com/index.cfm?PID=8975>
- A Wiki page stating that Liberty Christian Academy is associated with Thomas Road Baptist Church and shares a founder with Liberty University:
https://en.wikipedia.org/wiki/Liberty_Christian_Academy
- Vic's resume stating that he studied at **Liberty University**:
https://drive.google.com/file/d/1B3kvbegOjXLZceCcnqbwXS8tfcXy4K2/_view

- A Tweet from Vic mentioning Liberty University as his alma mater:
<https://twitter.com/vicmignogna/status/695253025854742528>
- An article originally linked by @MichellMcC73, showing Vic Mignogna performing in 'Annie' while at Liberty University, from **March 1st, 1989**.
https://prettyuglylittleliar.net/uploads/monthly_2019_02/1550062470596.png.6224ac048fe77f139ea0f115109f3a69.png
- Vic's resume stating that he was in **Lynchburg, Virginia between 1988 and 1990**:
https://drive.google.com/file/d/1B3kvbegOjXLZceCcNqbwXS8tfcXy4K2_/view
- ****Vic's birthday is August 27th, 1962. He was 26 years old from August 27th, 1988 to August 26th, 1989. @MichellMcC73 states that the alleged assault took place "after the play & school year ended."** Therefore **this would have occurred** when he was **26 or 27 years old**. See birth date here:
<https://www.imdb.com/name/nm0586003/>
- **Vic Mignogna** speaking at SacAnime 2010 about having **taught "drama and speech"** at a high school in Jacksonville, Florida, raising the possibility that he may also have taught elsewhere:
<https://youtu.be/SM0wq5aY-mE?t=433>
- Vic's resume stating that he has produced **music videos** and directed **stageplays**:
https://drive.google.com/file/d/1B3kvbegOjXLZceCcNqbwXS8tfcXy4K2_/view
- Voice actor DC Douglas believes and supports @MichellMcC73 on Twitter:
https://twitter.com/DC_Douglas/status/1094757961753346049

Allegation

Sharon BTW @SharonB89188965

Replying to **@MichellMcC73**

Vic Mignogna was my 11th grade English teacher. 1986-87, fired before the end of the school year and the rumor was that he'd been inappropriate with students. I didn't believe the rumors then. I do now.

3:45 AM - 13 Feb 2019

Read the Tweet: <https://twitter.com/SharonB89188965/status/1095393543894503432>

Sharon BTW @SharonB89188965

Replying to **@AmyMusa9 @MichellMcC73**

Trinity Christian, Jacksonville FL.

1:07 PM - 19 Feb 2019

Read the Tweet: <https://twitter.com/SharonB89188965/status/1097920672276406273>

Sharon BTW @SharonB89188965

Replying to **@DavidLaus1 @BoopiDoo88** and

Yep, first period. He introduced my class to diagramming sentences -- the first time I'd ever seen it IRL & not old tv shows. Maybe he also taught speech and drama, but I didn't take any of those classes, so I can't be 100%.

4:08 PM - 19 Feb 2019

Read the Tweet: <https://twitter.com/SharonB89188965/status/1097966298158518272>

Sharon BTW @SharonB89188965

Replying to [@BoopiDoo88](#) [@DavidLaus1](#) and

I graduated in 1988, so my junior year was 1986-1987. He was fired sometime after Easter that year -- he played Jesus on the cross, and I learned that red food dye & corn syrup makes great fake blood. He was almost entirely scrubbed from the yearbook.

1:34 PM - 19 Feb 2019

Read the Tweet: <https://twitter.com/SharonB89188965/status/1097927381195608064>

Relevant Information

- **Vic Mignogna** speaking at SacAnime 2010 about having been an **11th grade English, drama, and speech teacher in Jacksonville, Florida** after leaving university when he was 23 years old:
<https://youtu.be/SM0wq5aY-mE?t=433>
- Vic's resume stating that he left Liberty University in **1986**:
https://drive.google.com/file/d/1B3kvbegOjXLZceCcNqbwXS8tfcXy4K2_/view
- Vic's birthday is August 27th, 1962. He was 23 years old from August 27th, 1985 to August 26th, 1986. He left university in 1986. Therefore this would have occurred between **1986 and 1987**. See birth date here: <https://www.imdb.com/name/nm0586003/>
- A series of **photographs** shared by [@SharonB89188965](#) of Vic Mignogna allegedly at Trinity Christian Academy in 1987: <https://twitter.com/SharonB89188965/status/1097981187199520768>
<https://twitter.com/SharonB89188965/status/1097928594876182530>
- Trinity Christian Academy is a private pre-K to grade 12 school located in **Jacksonville, Florida**:
<https://www.tcajax.org/>
- An fan comment from 2012 stating that Vic was an **11th grade English teacher at Trinity Christian Academy**: <https://answers.yahoo.com/question/index?qid=20110929073242AAo7xxx&guccounter=1>
- A fan inquiry to **Trinity Christian Academy** about Vic Mignogna, which was forwarded to the school's vice-principal but left unanswered: <https://twitter.com/Rozalui/status/1104910376678895616>

Allegation

Jessie Pridemore

January 28 at 6:33 PM ·

TW Sexual Assault

I've been seeing a lot going around about Vic Mignogna recently. I've kept quiet because I didn't want to ruin my career. I didn't want to not get invited to conventions. But I can't keep quiet about it anymore. I used to have the same opinion as everyone else. "Oh well he's always been nice to me." But after seeing his behavior evolve in front of me over the years and my own assault story, I can't keep it to myself anymore.

Read the full Facebook post: <https://www.facebook.com/jessie.pridemore/posts/10156852278447159>

The full Facebook post by Jessie Pridemore alleges a rape by an unnamed voice actor during a convention, who then told Vic of the incident in a way that made Jessie appear "promiscuous." This is

followed by the accusation that Vic, upon seeing Jessie later on at the convention, grabbed her arm, forcibly tugged on her hair, and implied that, quote, "if the other voice actor had "had" me, he could too."

Relevant Information

- Voice actor **Todd Haberkorn** names himself as the alleged "rapist" in Jessie Pridemore's post, and says that the encounter was consensual. He also mentions a **mutual friend of his and Jessie's, named "Adam,"** several times: <https://i.imgur.com/smEoDdJ.jpg> <https://i.imgur.com/s9UcROW.jpg> <https://i.imgur.com/jcFu8wL.jpg> <https://drive.google.com/drive/folders/1NQnIQEoeB1o70vVa7iTYIGFe5TSPGxY>
- Adam Sheehan, director of events at Crunchyroll and VRV, **the mutual friend** mentioned by Todd, comes forward with his own statement in a Twitter thread. He **condemns Todd**, says that Jessie was given too much to drink and "*clearly past the point of making any clear decisions,*" states that he **believes Jessie about Vic, and mentions how Todd himself "is not a Vic fan"**: <https://twitter.com/neumaverick/status/1091106085006524416>
- In connection with the point above, Todd Haberkorn himself, in private text messages posted by Adam Sheehan, **does not defend Vic** from any #KickVic allegations, uses the hashtag "*#30yearAgeGap*" about Vic's new girlfriend, and confirms that Vic has made convention staffers cry: <https://twitter.com/neumaverick/status/1091106085006524416> <https://pbs.twimg.com/media/DyRj-acU0AAiOZm.jpg> <https://pbs.twimg.com/media/DyRj-cuVYAAAn8Mo.jpg> <https://pbs.twimg.com/media/DyRj-bUVsAE0-Xh.jpg>
- Todd makes another statement, again calling the accusations against him "*untrue*" but saying that he is "*supportive*" of the "*larger movement*" that is "*combating systemic harassment and abuse,*" and that there are "*larger issues that are rightfully getting the long overdue attention they deserve.*" He **does not defend Vic Mignogna**: <https://twitter.com/ToddHaberkorn/status/1091554728968970245> <http://i.4cdn.org/cgl/1549085837185.png>
- Todd confirms that his rebuttal against Jessie Pridemore was "*simply about me and my situation. Not Vic's.*": <https://twitter.com/RozalLui/status/1098716760453406721>

Voice Actors or Industry Professionals Who Allege to Having Personally Experienced Harassment or Sexually Inappropriate Behavior from Vic Mignogna

- Voice actor Monica Rial: <https://twitter.com/Rialisms/status/1093275331929296897> <https://twitter.com/Rialisms/status/1098028342475964417>
- Voice actor Jamie Marchi: <https://twitter.com/marchimark/status/1094020618327150592>
- Voice actor Samantha Inoue-Harte: <https://archive.fo/sr893>
- Voice actor Neil Kaplan: <https://twitter.com/NeKap/status/1092306922823249920>
- Voice actor Jessie Pridemore: <https://www.facebook.com/jessie.pridemore/posts/10156852278447159>
- Voice actor "Charlotte," (possibly same as Monica Rial above): <https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **

- Voice actor "Rachel":
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
- Voice actor "Gretchen":
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
- Professional cosplayer "Diana":
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
- Convention staffer LJ Montello: <https://twitter.com/ljmontello/status/1101553247200849920>
** identity unconfirmed

Voice Actors or Industry Professionals Who Allege to Having Personally Witnessed Harassment or Sexually Inappropriate Behavior from Vic Mignogna

- Voice actor Samantha Inoue-Harte: <https://archive.fo/sr893>
https://m.facebook.com/story.php?story_fbid=108715880299403&id=100034829746906
- Former Funimation employee and current Rooster Teeth employee Michele Sontag:
<https://twitter.com/MicheleFeghali/status/1092852906716475392>
- Convention staffer Andrea Romemo writing in 2019 (A-Kon 2013):
https://twitter.com/Andrea_Romemo/status/1093026361613144064
- Voice director Donald A Shults: <https://twitter.com/DonaldAShults/status/1093356833052520448>
- Voice actor Josh Grelle: <https://twitter.com/JoshGrelle/status/1092653205505347584>
- Convention staffer "Extermination" writing in 2019 (possibly Animethon 2007):
<https://twitter.com/EXTERMINAT1ON/status/1095532366305599489>
<https://twitter.com/EXTERMINAT1ON/status/1090691132701491202>
<https://twitter.com/EXTERMINAT1ON/status/1086025969427714049> **
- Convention staffer "SilentSakura":
https://www.reddit.com/r/roosterteeth/comments/agwg0n/vic_mignognas_name_is_being_brought_up_again_in/eeerhxa/?context=3 **
- Convention staffer "Syri": https://twitter.com/Syri_blazefury/status/1090821217895022592 **
- Producer and writer Emmett Plant writing in 2019 (BayouCon 2013):
https://twitter.com/Emm_Initiative/status/1100218262288134149
<http://emmettwrites.tumblr.com/post/183061213034/vic-mignogna-a-love-story>
- Convention staffer LJ Montello writing in 2019 (Acen. Year Unknown. Possibly mid-00's):
<https://twitter.com/ljmontello/status/1101553247200849920>
<https://twitter.com/ljmontello/status/1101555098352668672>
- Convention staffer Jenny Bell Grande writing in 2019 (San Diego Comic Con. Year Unknown. Possibly 2010 or 2013) <https://twitter.com/jennybellgrande/status/1093921377218744321>
** identity unconfirmed

Voice Actors or Industry Professionals Who Allege to Having Personally Witnessed Rude Behavior Toward Convention Staffers or Colleagues from Vic Mignogna

- Convention booking manager, guest liaison, and staffer Karissa Barrows:
<https://twitter.com/SJBsMama/status/1092565481268150274>

- Convention staffer "Mystery Corgi" writing in 2019 (Convention Unknown. 2008):
<https://twitter.com/MysteryCorgi/status/1093006917771952128> **
 - Voice actor Todd Haberkorn writing in 2018 (Possibly Anime Central or ColossalCon 2012):
<https://twitter.com/neumaverick/status/1091106085006524416>
 - Voice actor Samantha Inoue-Harte: <https://archive.fo/sr893>
 - Writer and convention host Moisés Chiullán writing in 2019 (Convention Unknown. 2014):
<https://twitter.com/moiseschiu/status/1093429769360887808>
 - Event planner and convention staffer "Katie Lynx" (Convention in Dallas Unknown. Possibly A-Kon. 2009): <https://twitter.com/KJBLynx/status/1094329043418255360> **
 - Makeup artist "Stacey": <https://twitter.com/BaraMountain/status/1092639920919855104> **
 - Convention staffer "Lyn Griffin" (AUSA 2005):
<https://twitter.com/StudioGriffin/status/1093185047149137921> **
 - Convention staffer "Extermination" (Convention Unknown. Possibly Animethon. 2007):
<https://twitter.com/EXTERMINATION/status/1095944004762562567> **
 - Convention staffer "Joe Kenner": <https://twitter.com/JoeKenner/status/1091418327539466240> **
 - Convention staffer "JL Montello" writing in 2019 (Tekko. Year Unknown):
https://www.reddit.com/r/roosterteeth/comments/an8s7p/vic_mignogna_is_no_longer_a_part_of_the_cast_of/efs7wz7/ **
 - Convention staffers "Anonymous" speaking in 2019 (Phoenix Comicon aka Phoenix FanFusion. Year Unknown):
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
 - Convention staffer "Kevin Eav": <https://twitter.com/kurenaixiii/status/1094812363667103745> **
 - Convention staffer "Helga Pataki-Shortman":
<https://twitter.com/GHelgaShortman/status/1094755005272416258> **
 - Convention staffer "Adam Zalonis": <https://twitter.com/AdamZalonis/status/1093979068830285825> **
 - Convention staffer LJ Montello: <https://twitter.com/ljmontello/status/1101550781713440768>
<https://twitter.com/ljmontello/status/1101551597149016064>
<https://twitter.com/ljmontello/status/1101555098352668672>
 - Convention staffer "Allison": <https://twitter.com/hanleia/status/1085479459732389888>
<https://twitter.com/hanleia/status/1085481019975716864> **
 - Convention staffer "Anne":
https://www.reddit.com/r/FullmetalAlchemist/comments/578ot7/is_vic_mignogna_really_as_bad_as_the_rumors_say/d8pwndh/ **
 - Convention staffer "Jhoudiey":
https://www.reddit.com/r/FullmetalAlchemist/comments/259epy/is_there_any_proof_of_vic_mignogna_being_a_jerk/chf4bwi/ **
- ** identity unconfirmed

Voice Actors or Industry Professionals Who Support #KickVic or Believe the Accusations

- Voice actor Monica Rial: <https://twitter.com/Rialisms/status/1093275331929296897>
<https://twitter.com/Rialisms/status/1098028342475964417>
- Voice actor Chris Sabat: <https://twitter.com/VoiceOfVegeta/status/1092814170096103426>
<https://twitter.com/VoiceOfVegeta/status/1096221687639625729>
<https://twitter.com/VoiceOfVegeta/status/1095335673366630407>
<https://twitter.com/VoiceOfVegeta/status/1093304122776928257>
<https://twitter.com/VoiceOfVegeta/status/1095164692308418560>
- <https://twitter.com/VoiceOfVegeta/status/1097005699077419009>
- Voice actor Samantha Inoue-Harte: <https://archive.fo/tsDAq>
https://m.facebook.com/story.php?story_fbid=108715880299403&id=100034829746906
- Voice actor DC Douglas: https://twitter.com/DC_Douglas/status/1090727974653972480
- Voice actor Tara Jayne Sands: <https://twitter.com/TaraSandsLA/status/1090759962714755073>
- Voice actor Jamie McGonnigal: <https://twitter.com/McBenefit/status/1090066200577695744>
- Voice actor SungWon Cho: <https://twitter.com/prozdkp/status/1092897043301974018>
- Voice actor Neil Kaplan: <https://twitter.com/NeKap/status/1092306922823249920>
- Voice actor Sean Schemmel: <https://twitter.com/SeanSchemmel/status/1096919749693325312>
- Voice actor J Michael Tatum: <https://twitter.com/JMichaelTatum/status/1092614635755397120>
- Voice actor Sean Schemmel: <https://twitter.com/SeanSchemmel/status/1097567324159111168>
- Voice actor Jamie Marchi: <https://twitter.com/marchimark/status/1094020618327150592>
- Former Funimation employee and current Rooster Teeth employee Michele Sontag: <https://twitter.com/MicheleFeghali/status/1092852906716475392>
- Convention booking manager, guest liaison, and staffer Karissa Barrows: <https://twitter.com/SJBsMama/status/1090803265330184192>
- Voice director Donald A Shults: <https://twitter.com/DonaldAShults/status/1093356833052520448>
- Convention volunteer staffer Andrea Romemo: https://twitter.com/Andrea_Romemo/status/1093026361613144064
- Actor and voice actor Michele Specht: <https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505>
- Voice actor Dawn M. Bennett: <https://twitter.com/DawnMBennettVA/status/1092659231449403394>
- Founder and writer at Anime News Network Justin Sevakis: <https://twitter.com/worldofcrap/status/1093669193453465600>
- Voice actor Amber Lee Connors: <https://twitter.com/AmberLeeConnors/status/1092665324955152384>
- Voice actor Justin Briner: <https://twitter.com/justinbriner/status/1092645283849072640>
- Voice actor Josh Grelle: <https://twitter.com/JoshGrelle/status/1092653205505347584>
<https://twitter.com/JoshGrelle/status/1109994133819670529> ***
- Voice actor Christopher Wehkamp: <https://twitter.com/ChrisWehkamp/status/1092667286161215489>
- Voice actor Kimlinh Tran: <https://twitter.com/KimlinhTran/status/1092678437662162944>
- Voice actor Jen Brown: https://twitter.com/The_JenBrown/status/1092638490762850305
- Writer and convention host Moisés Chiullán: <https://twitter.com/moiseschiu/status/1093429769360887808>
- Youtuber Dominic Smith: https://twitter.com/Dominic_Smith/status/1098002459371413504

- Youtuber Digibro: <https://twitter.com/Digibrah/status/1095037956816023554>
- Youtuber and gaming journalist Danny Thompson:
<https://twitter.com/ShadowForks/status/1097934127855071232>
<https://twitter.com/ShadowForks/status/1097555381054631936>
- Voice actor and director Amanda Winn Lee:
<https://twitter.com/amandawinnlee/status/1093556444723466241>
- Voice actress Kara Edwards: <https://twitter.com/karaedwards/status/1092891706004070400>
<https://twitter.com/karaedwards/status/1095681383782141952>
- Producer and writer Emmett Plant:
https://twitter.com/Emm_Initiative/status/1100218262288134149
- Staff writer Beth Elderkin: <https://twitter.com/BethElderkin/status/1119197839610060800>
- Voice actor Daman Mills: <https://twitter.com/DamanMills/status/1109844655343132672> ***
- Actor and voice actor Jason Douglas:
<https://twitter.com/MrJasonDouglas/status/1109790986031517697?s=20> ***
- Voice actor Josh Martin: <https://twitter.com/JoshMartinVoice/status/1109146051750084611>
<https://twitter.com/JoshMartinVoice/status/1109130078464720896>
<https://twitter.com/JoshMartinVoice/status/1109834726850904064> ***
- Voice actor Chris Rager: <https://twitter.com/ragercoaster/status/1093161220885098497>
<https://twitter.com/ragercoaster/status/1108598889702195200>
<https://twitter.com/ragercoaster/status/1108597336991821824> ***
- Voice actor Sarah Wiedenheft: <https://twitter.com/SarahWiedenheft/status/1110040464210755584>

- Convention panelist Ken: <https://twitter.com/DetectiveX/status/1109834984527933445> ***
- Convention panelist Terez: <https://twitter.com/Terez27/status/1109465518942101504> ***
- Convention panelist Drake: <https://twitter.com/TrailerDrake/status/1109474553338703874> ***
- Convention panelist Gaby: <https://twitter.com/MozillaVulpix/status/1109956495007875072> ***

*** protested Vic Mignogna via convention cancellation

- Voice actor and director Chris Ayres writing about separate yet related issues:
<https://twitter.com/Chrisayresva/status/1089365694691659776>
<https://twitter.com/Chrisayresva/status/1099859433797181440>
<https://twitter.com/Chrisayresva/status/1097898471653367808>
<https://twitter.com/Chrisayresva/status/1097880451446919169>
<https://twitter.com/Chrisayresva/status/1095507561867026432>
<https://twitter.com/Chrisayresva/status/109408053522280192>
<https://twitter.com/Chrisayresva/status/1105905816979361793>
<https://twitter.com/Chrisayresva/status/1092827080184745985>

A Statement from Vic Mignogna's Ex-Fiancee, Actor and Voice Actor Michele Specht

My 12-year relationship [and] engagement to Vic Mignogna ended in May 2018. Very soon after, information about Vic's previously unknown behavior began to surface, and has continued to do so over the last several months—each revelation more shocking and painful than the previous, spanning the entirety of our time together. I have had to face the reality that the loving, monogamous relationship I believed in and was devoted to never existed.

This pattern of egregious behavior is so linked to his position of power that the voices of those stepping forward with allegations need to be heard clearly, and their claims taken with the utmost seriousness. And I extend whatever remains of my broken heart to every one of them.

Read the full article:

<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505>

- Vic Mignogna allegedly admits to attempting to cheat on Michele Specht:
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505>
- A donation page from 2013 for the wedding of Vic Mignogna and Michele Specht, which never occurred, yet is still accepting donations:
<https://www.depositagift.com/1995/MignognaWedding/ShopRegistry/registry>

Private Individuals Who Allege to Having Personally Experienced Harassment or Sexually Inappropriate Behavior from Vic Mignogna

- Animator and plush designer Kelly Onelani:
<https://twitter.com/kellyonelani/status/1086014744736149504>
- Cosplayer Missy Yamashita: <https://twitter.com/CosplayMissy/status/1091484387286413312>
- Convention staffer "Lyn Griffin" writing in 2019 (AUSA 2005):
<https://twitter.com/StudioGriffin/status/1093185047149137921> **
- Convention staffer "JL Montello" writing in 2019 (Tekko, Year Unknown):
https://www.reddit.com/r/roosterteeth/comments/an8s7p/vic_mignogna_is_no_longer_a_part_of_the_cast_of/efs7wz7/ **
- Convention-goer "Bailey" writing in 2019:
<https://twitter.com/shalalashaska/status/1088595542219776000> **
 - Convention-goer "Bailey" writing in 2017 and 2018 about the same event:
<https://twitter.com/shalalashaska/status/1088602074059821057> **
- Convention-goer "Kaylee": https://twitter.com/princess_mareep/status/1090808338005274624 **
- Convention-goer "Nyahko":
<https://prettvuglylittleliar.net/topic/3255-vic-mignogna/?do=findComment&comment=415695> **
- Artist "Manda": <https://twitter.com/hyperprisms/status/1090281651819687943> **
- Convention-goer "Angelique" writing in 2019 (Convention Unknown, 2014):
<https://twitter.com/AngeliqueAnn/status/1093138334329769985> **
- Convention-goer "LightHeartCos" writing in 2019 (A-Kon, Year Unknown, Possibly 2007 or 2008):
<https://twitter.com/lightheartcos/status/1091587645212368897> **
- Convention-goer "KinzieChan": <https://twitter.com/KinzieChan/status/1090862396304896000> **

- Convention-goer “Anonymous” writing in 2015 (NanDesuKan. Year Unknown. **Possibly** 2008):
<http://vicmeggnognahorrorstories.tumblr.com/post/110151611970/hi-first-off-i-would-like-to-say-th-at-i-already> **
 - Convention-goer Viola Hewak (Convention Unknown. 2011):
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505>
 - Convention-goer Michelle Light (Convention Unknown. 2013):
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505>
<https://twitter.com/papertoadette/status/1092408312136646656>
<https://twitter.com/papertoadette/status/1098011996727865344>
 - Cosplayer and writer “Levi B”: <https://twitter.com/tenhinas/status/1085669809210171392> **
 - Convention staffer “Witty Username” writing in 2015:
https://www.reddit.com/r/TalesoftheConvention/comments/2xjnxk/ive_worked_guest_relations_for_almost_10_years/cp1475g/ **
 - Convention-goer “Kelly” speaking in 2019 (Convention Unknown. 2014):
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
 - Convention-goer “Dave” speaking in 2019 (Convention Unknown. 2012):
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
 - Podcaster Zach Logan: https://twitter.com/Zach_Logan/status/1090608509761261569
- ** identity unconfirmed

Private Individuals Who Allege to Having Personally Witnessed Harassment or Sexually Inappropriate Behavior from Vic Mignogna

- Convention-goer “Dylan Smith”: <https://twitter.com/qzzus/status/1089006658800570368> **
 - Cosplayer “Sgt Serger”: <https://twitter.com/SgtSerger/status/1090158910516776960> **
 - Husband of cosplayer Jacqueline L. Miller writing in 2019 (Convention Unknown. 2007):
<https://twitter.com/Kenshinkyo/status/1092448383011307520>
 - Convention-goer “FireintheMountains” writing in 2014 (**possibly** referencing “Nyahko” in previous section) (Convention Unknown. **Possibly** 2007):
https://www.reddit.com/r/weeabootales/comments/1uli0u/vic_mignogna_and_the_fangirls/cemg3eg/ **
 - Convention-goer “xPirate_QueenX” writing in 2019 (**possibly** same as above) (Convention in Texas Unknown. **Possibly** 2006 or 2007):
<https://ohnotheydidnt.livejournal.com/113878901.html?thread=19312260469#t19312260469> **
 - Convention-goer “Ellkehrn”: <https://twitter.com/ellkehrn/status/1091316095930286082> **
- ** identity unconfirmed

Private Individuals Who Allege to Having Personally Witnessed Rude Behavior Toward Convention Staffers, Colleagues, or Fans from Vic Mignogna

- Convention-goer “TrashCantDolt”: <https://twitter.com/trashcantdoit/status/1092529149535809537> **
- Convention-goer “Sonomichii” writing in 2019 (A-Kon. Year Unknown):
<https://twitter.com/Sonomichii/status/1091610371146829824> **

- Convention-goer "Cutiebunny" writing in 2014 (SakuraCon 2013):
<https://www.animenewsnetwork.com/bbs/phpBB2/viewtopic.php?p=4373199#4373199>
<https://www.animenewsnetwork.com/bbs/phpBB2/viewtopic.php?p=4373240#4373240>
<https://www.animenewsnetwork.com/bbs/phpBB2/viewtopic.php?p=4373307#4373307> **
- ** identity unconfirmed

Industry Professionals or Private Individuals Who Allege That Vic Mignogna Was Banned or Removed from Specific Conventions for Sexually Inappropriate Behavior or Rude Behavior Toward Convention Staffers

- Freelance artist "Yui" writing in 2019 (Anime Weekend Atlanta. Year Unknown. Possibly 2012 to 2016): <https://twitter.com/shibonsen/status/1087352921015111680> **
 - Convention staffer "Extermination" writing in 2019 (Convention Unknown. Possibly Animethon 2007 in Edmonton, Canada): <https://twitter.com/EXTERMINAT1ON/status/1094297978649624576> **
 - Convention staffer "BustermanZero":
https://www.reddit.com/r/roosterteeth/comments/an8s7p/vic_mignogna_is_no_longer_a_part_of_the_cast_of/efs1nr/ **
 - Convention-goer "SadGayWerewolf" writing in 2019 (Otaku Omaha 2008):
<http://sadgaywerewolf.tumblr.com/post/182962740533/hello-could-you-possibly-talk-a-little-bit-abo-ut> **
 - Convention-goer "SadGayWerewolf" writing in 2015 about the same event:
<http://vicmeggnahorrorstories.tumblr.com/post/113908244144/his-panel-ran-over-by-almost-30-minutes-and-when> **
 - Convention-goer "Eevie" writing in 2019 about the same event:
<https://twitter.com/TenshiHime13/status/1094795110531899392> **
 - Convention-goer "ZetsuBouquet" writing in 2019 (Youmacon in Detroit. Year Unknown.):
<https://twitter.com/zetsubouquet/status/1085608220415139840> **
 - Editor and legal writer "Herohom Mel" writing in 2019 (Metrocon in Florida. Year Unknown.):
<https://twitter.com/triplegcecil/status/1085620636066697222> **
 - Convention-goer "Anonymous" writing in 2015 about the same event:
<https://warosu.org/cgl/thread/8090856#p8110615> **
 - Convention staffer LJ Montello writing in 2019 (ACEN in Illinois. Year Unknown. Possibly mid-00's):
<https://twitter.com/ljmontello/status/1101581948542083072>
<https://twitter.com/ljmontello/status/1101553247200849920>
<https://twitter.com/ljmontello/status/1101555098352668672>
<https://twitter.com/ljmontello/status/1101579825519575040>
- ** identity unconfirmed

Voice Actors or Industry Professionals Who Allege that Vic Mignogna Was Previously Cautioned or Warned About His Sexually Inappropriate Behavior

- Voice actor Monica Rial: <https://twitter.com/Rialisms/status/1093289208708517889>
<https://twitter.com/Rialisms/status/1092584718980337664>
<https://twitter.com/Rialisms/status/1092590331806343168>
- Voice actor Tara Jayne Sands: <https://twitter.com/TaraSandsLA/status/1090759962714755073>
- Founder and writer at Anime News Network Justin Sevakis: <https://twitter.com/worldofcrap/status/1093669193453465600>
- Voice actor Samantha Inoue-Harte: <https://archive.fo/xFsdw>

Industry Professionals or Private Individuals Who Allege to Having Personally Witnessed Homophobic Behavior or Evidence of Homophobia at Conventions from Vic Mignogna

- Convention staffer "Extermination" writing in 2019 (possibly Animethon 2007):
<https://twitter.com/EXTERMINAT1ON/status/1095057884503830528>
<https://twitter.com/EXTERMINAT1ON/status/1095944004762562567> **
- Convention-goer "SadGayWerewolf" writing in 2019 (Otaku Omaha 2008):
<http://sadgaywerewolf.tumblr.com/post/182962740533/hello-could-you-possibly-talk-a-little-bit-about> **
- Convention-goer "SadGayWerewolf" writing in 2015 about the same event:
<http://vicmeggnoghorrorstories.tumblr.com/post/113895423325/one-time-i-went-to-a-convention-that-vic-was-at>
<http://vicmeggnoghorrorstories.tumblr.com/post/113908244144/his-panel-ran-over-by-almost-30-minutes-and-when>
<http://vicmeggnoghorrorstories.tumblr.com/post/113920374943/cont-names-and-told-her-she-was-going-to-hell-in> **
- Convention-goer "Eevie" writing in 2019 about the same event:
<https://twitter.com/TenshiHime13/status/1094795110531899392> **
- Cosplayer William Alexander Erbes writing in 2019 (Anime Expo 2012):
https://www.facebook.com/FlamFabCosplay/posts/2122685731149586?_tn=-R
- Cosplayer William Alexander Erbes writing in 2014 about the same event:
<http://vicmeggnoghorrorstories.tumblr.com/post/103673685796/people-that-think-they-know-vic-meggnogna-have-no>
- Convention-goer "Get Lich Or Die Trying" writing in 2008 (Animazement 2008):
https://www.gaiaonline.com/forum/anime-manga-comics/watch-vic-mignogna-lie/t.43797613_75/#75
https://www.gaiaonline.com/forum/anime-manga-comics/watch-vic-mignogna-lie/t.43797613_78/#78 **
- A relevant video of Vic Mignogna discussing the fact that he does not sign fanart depicting male/male relationships: <https://www.youtube.com/watch?v=8ojDsn04XmM&feature=youtu.be&t=1m20s>
- A statement from Vic Mignogna that he does not sign "yaoi" because it is "not canon":
<https://twitter.com/vicmignogna/status/1087239820680880128>

- Examples of Vic Mignogna signing fanart that is not canon:
<https://twitter.com/SeiferA/status/1087276883069284353>
<https://www.deviantart.com/the-da-ranger-group/gallery/26420742/Signed-By-Vic>
 - Youtuber Kaylyn Saucedo with relevant information:
<https://twitter.com/MarzGurl/status/1087417234970927104>
- ** identity unconfirmed**

Alleged Information from Industry Professionals or Private Individuals on the Internal Investigation Carried Out by Funimation that Resulted in the Termination of Vic Mignogna

- Voice actor Monica Rial: <https://twitter.com/Rialisms/status/1098028342475964417>
 - Voice actor Samantha Inoue-Harte: <https://archive.fo/VgCf0>
https://m.facebook.com/story.php?story_fbid=108715880299403&id=100034829746906
 - Twitter user "House of Tath," who has also stated that he does not believe Vic Mignogna is guilty:
<https://twitter.com/bcscarbrough/status/1095415980526845952> **
 - Voice actor Chris Sabat: <https://twitter.com/VoiceOfVegeta/status/1096210641461878786>
 - Voice actors interviewed for Gizmodo article:
<https://io9.gizmodo.com/one-of-anime-s-biggest-voices-accused-of-sexual-harassm-1832390505> **
- ** identity unconfirmed**

Vic Mignogna 1-19-19

Albums > Ranger Q&A with ...

Ranger Q&A with Vic, 1-19-2019

27 Photos · Updated 5 months ago

Vic had a Q&A with the Rangers Saturday night that was live streamed here on Facebook. We did not realize that video was corrupted and thusly unplayable, so here is the full conversation. Some screenshots are floating around the internet, here's the full transcript for anyone who'd like to see. The chat lasted a full two hours, and we kept it as organized as possible. EDIT: despite being publicly livestreamed, we've had requests to censor usernames. All photos have been appropriately censored now and reuploaded.

Thank you for your patience.

“Please do whatever you can to counter all these lies and negativity. Remember the old saying... “the only thing necessary for evil to triumph is for good people to do nothing.”

“People who know me know how absurd these claims are. I hope all those people who know better will speak up for right and let the conventions know that this tiny group of detractors don't speak for the VAST majority. Please do anything you can to counter this stuff with positivity and your experiences. Let anyone you know, convention sites includes, that these handful of people leveling baseless garbage DO NOT speak for the majority. That's all I ask.”

Last Saturday at 9:32 PM

Since you said that you'll have to revise the way you interact with fans at conventions from now on, does that mean that you'll be changing anything you do during your Gospel of John panel as well? At the few conventions I've been to with you there, that's the only thing that's been different with every voice actor I've met and every convention I've attended. I really don't want to lose experiencing something like that. Also, I'd greatly accept a hug the next time I'm able to see you. You're the biggest inspiration in the industry to me from your faith to how you treat others. I don't want to see that ruined.

(PS. Last time I saw you was in 2017 at Triad Anime Con, and I really want to see you again :D).

👍 17 🌟 8

Last Saturday at 9:32 PM

on deck.

Last Saturday at 9:34 PM

Thanks P. I will not be changing that at all. What I WILL be changing is the assumption that everyone knows that my hugging etc is completely innocent. I've always been an affectionate kinda person. I hug everyone! But I'm sorry to say that these people have made it clear that I need to adjust that.

❤️ 18 😊 2 🙄 6 😬 8

Last Saturday at 9:35 PM

Last Saturday at 9:35 PM

I'm sure I can speak for the rest of us Vic that we appreciate you coming here to discuss this matter with us, and are being open and honest with all of us. But what can all of us do to combat this? I know its nearly impossible to get rid of everything that been said and people will keep bringing it up.

👍 4

Last Saturday at 9:36 PM

Hi n

Last Saturday at 9:37 PM

n you're next.

Last Saturday at 9:38 PM

thanks for asking M. Please do whatever you can to counter all these lies and negativity. Remember the old saying..... "the only thing necessary for evil to triumph is for good people to do nothing"

👍 22 🐦 9 ❤️ 8

10:50 PM

one last thing everyone.....

6 🍌 3 🍌 7

10:51 PM

Alright, Nobody but Mods/Vic can talk right now. Say your piece, Bossman!

10:51 PM

People who know me know how absurd these claims are. I hope all those people who know better will speak up for right and let the conventions know that this tiny group of detractors don't speak for the VAST majority. Please do anything you can to counter this stuff with positivity and your experiences. Let anyone you know, convention sites included, that these handful of people leveling baseless garbage DO NOT speak for the majority. That's all I ask. And know that I love and appreciate all of you so much. (except [redacted])

5 🍌 3 🍌 11 🍌 14 🍌 3 🍌 2 🍌 4 🍌 3 🍌 2 🍌 3 🍌 1 🍌 15

hehe..... love you general 😊

10:53 PM

oh man

10:53 PM

10:52 PM

pfft.

10:54 PM

God bless you guys.... I will hope to see you all this year sometime somewhere!

19 🍌 16 🍌 22 🍌 6 🍌 18 🍌 6 🍌 5 🍌 8 🍌 5 🍌 9 🍌 5 🍌 9

EXHIBIT B

AFFIDAVIT OF ROBIN MICHELLE BLANKENSHIP MCCONNELL

STATE OF NORTH CAROLINA §
 §
COUNTY OF MECKLENBURG §

Before me, the undersigned Notary Public, on this day personally appeared Robin Michelle Blankenship-McConnell, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Robin Michelle Blankenship-McConnell. I am of sound mind, competent and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. In the Spring of 1989, I was a sophomore high school student at Lynchburg Christian Academy in Lynchburg, Virginia. Lynchburg Christian Academy is now known as “Liberty Christian Academy.”

3. I was cast in the school play of “Mouse Trap” by Agatha Christi where I was first introduced to Victor Mignogna (“Mignogna”) during our rehearsals. Mignogna was helping with the production of this play and an assistant to the directors. I believe that Mignogna was around 26 years old at the time when I met him.

4. On several occasions, Mignogna would request for me to stay late after rehearsals when all the other students and teachers had left. He took a special interest in me and wanted to rehearse more. He would also play love songs on the piano for me.

5. After the play had wrapped up, Mignogna would frequently stop by my work to see me in 1989. At the time, I worked at Billy Joe’s Ice Cream Parlor, which is no longer in business.

6. One day in the Summer of 1989, Mignogna approached me in his car when I was riding my bike home from work at Billy Joe’s. He asked me to come over to his house because he

wanted to show me a “Christian worship video” he had been working on. I agreed to follow him home.

7. When I arrived at his house, there was another man there. Mignogna and this man got into a heated discussion in the kitchen, and the other man left abruptly. I suspect the fight was about my presence in his house.

8. Shortly after I entered his house and after Mignogna’s friend left, Mignogna went into his bedroom and then came out shirtless and only wearing very small and revealing shorts. I felt incredibly uncomfortable and realized that Mignogna did not have a “Christian worship video” to show me. Mignogna sat on the couch next to me and began putting his arms around me and touching me. He pulled my hair out of my ponytail and started playing with my hair. Mignogna also started licking my ear and stated, “Let’s just enjoy each other.”

9. I completely froze and could not move as Mignogna continued to make advances that I did not want to occur or consent to. I told him numerous times that I needed to leave and that my mother would be looking for me. After several verbal rejections, I was able to push Mignogna off of me and leave. Mignogna was extremely upset at me and incredibly rude.

10. I left Mignogna’s house as soon as I could and rode my bike over to my youth minister’s office to tell him what had happened. Unfortunately, the youth minister was not in the office, and I left on my bike and went home.

11. After this encounter, I would see Mignogna around town at various sermons and religious functions. I felt scared and incredibly uncomfortable every time I saw him. Mignogna moved to Houston shortly after.

This concludes my affidavit testimony.

Executed in Mecklenburg County, North Carolina on May 27, 2019.

Robin Michelle Blankenship McConnell
Robin Michelle Blankenship McConnell

SUBSCRIBED AND SWORN TO BEFORE ME on this 27th day of May 2019.

Teresa F Quan
Notary Public, State of North Carolina

Teresa F Quan
Printed Name

My Commission Expires: Sept 30, 2022

TERESA F QUAN
Notary Public, North Carolina
Mecklenburg County
My Commission Expires
September 30, 2022

EXHIBIT C

AFFIDAVIT OF KARA EDWARDS

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

Before me, the undersigned Notary Public, on this day personally appeared Kara Edwards, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Kara Edwards and I am over 18 years of age. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I first met Victor Mignogna (“Mignogna”) in 2008 at a convention called Animazement in Raleigh, North Carolina. The first time I met Mignogna I honestly thought he was gay. We became friends, hung out at the convention, goofed off during panels, and even worked out at the hotel gym together. I was comfortable around him and let my guard down, because I never considered he’d be interested in having a romantic relationship with me. During the convention, I told Mignogna I was married.

3. I realized on Sunday, the final day of the convention, that my initial impressions of Mignogna were incorrect.

4. Mignogna and I were staying in the same hotel, in rooms next door to each other, for the Animazement Convention. Our rooms shared an internal door. On Sunday night, we walked backed to our hotel rooms together after closing ceremonies and said goodbye. Mignogna proceeded to give me a hug that went on for a really long time and made me feel uncomfortable. This is when I realized that Mignogna wanted more from me than a friendship. I realized I’d made a mistake in being so friendly.

5. I was able to get away from Mignogna's hug, say bye, and went into my hotel room alone. After I said goodbye to Mignogna, I called my husband and said goodnight to him. Shortly after I hung up with my husband, I started hearing knocking on the door in between my room and Mignogna's room. I froze and did not answer or open the door. The knocking stopped, and then my hotel room phone rang. It was Mignogna. Mignogna told me "Open the door. Nobody has to know." I said no and reminded him that I was married and hung up the phone. I also knew that Mignogna was in a relationship at the time with Michele Specht.
6. Mignogna again began knocking on the door in between our room and calling through the door, in a creepy voice, "Come on, Kara. Nobody has to know. You know you want this." Mignogna would not stop and I began feeling scared. I did not answer the door, and locked myself in the hotel bathroom, turned on the shower, and sat down on the bathroom floor shaking for about an hour until I felt safe again. The next morning, I told another voice actor about what Mignogna did. I also told several other FUNimation actors that I'm friends with about what happened that night.
7. The next convention I saw Mignogna at was in 2008 at Nan Desu Kan in Denver, Colorado. I saw Mignogna there with his fiancée, Michele Specht. When I met her, I felt uncomfortable because I knew what Mignogna was doing behind her back, and that he clearly would have cheated on her had I opened the door in Raleigh. At this convention, Mignogna organized a concert focusing on Michele and his love for her. He sang songs for her and talked about how she was the love of his life. He did not hit on or try to proposition me at this convention. I had no reason at this time to suspect anything like what had happened in Raleigh would happen again.
8. In 2010, I was a guest at ShadoCon in Tampa, Florida.

9. During ShadoCon, on Friday, Mignogna and I were in the hotel and on the way to a convention event (I think it was a panel) and he said that he needed to get something from his hotel room to show me. He had not been hitting on me during the day and I was not under any impression that he still had any type of sexual interest in me.
10. Mignogna's hotel room was a suite with a foyer and a sofa. He invited me to sit down to catch up. I sat down on a chair to the left of the sofa. Mignogna sat down on the sofa next to me and started asking me about my recent divorce. I remember that Mignogna next dropped to his knees and started rubbing my thighs and buttocks. In a creepy, seductive voice he said, "Let me be sweet to you." I stood up to try to get away from him, and he blocked me from leaving. He grabbed me and put me into one of his long uncomfortable hugs, rubbing his hands up and down my back, and trying to console me about my divorce. He pressed his face against mine, moving his mouth as close to mine as possible without actually kissing me. Mignogna would not let go or give me space. He again whispered into my ear "Just let me be sweet to you." I will never forget what he said as long as I live because it was so disturbing and creepy. He repeated this phrase multiple times.
11. Mignogna also told me that his fiancée was so jealous of me because I'm beautiful and she could see some kind of romantic connection between us. I told Mignogna to "Please tell Michele there is nothing going on." I remember feeling completely frozen and terrified. I was traumatized and don't recall exactly what I said to enable me to get away, but I was finally able to get out of his embrace and out of his hotel room.
12. On the Saturday of the ShadoCon Convention, I went out to dinner with a friend who lived in Tampa, and Mignogna joined us. At this time, I felt it best to try and keep the peace, as I knew how powerful Mignogna was in our industry. I felt safe with other friends present. When we

returned, we ran into Mary Reese and her son, in the lobby. Mignogna demanded that he escort me up to my room, and grabbed my arm to pull me away. I felt like I could not say no to Mignogna or else he would cause a scene, so I allowed him to walk me to my room for the night. I have a memory of looking to Mary as we walked off, as if subconsciously begging her to help me.

13. When I got to my hotel room, Mignogna asked to come inside, and I told him no. I reminded him of his commitment to Michele and told him that “I’m friends with Michele.” His response was, “Well, you’re not that good of friends.” I told Mignogna to stop. I remember that he was blocking my door. I held my ground and did not open the door or let him inside.
14. Finally, Mignogna walked away. The next morning, Mary Reese noticed I was upset. She asked me what was wrong. I told her about both events with Mignogna—the one in his hotel room and the one outside my hotel room door. I also told her about the event 2 years prior in North Carolina. I told her that I was terrified of Mignogna and was very worried he was going to try and hurt my career.
15. On the same Sunday at ShadoCon in which I told Mary Reese about Mignogna’s behavior, Mignogna and I were supposed to sign autographs together in the same convention room. He was a much bigger celebrity than I was at the time, so it made sense to put us together so that fans could get my autograph as they left his line. Mignogna requested at the last minute to have me removed from his autograph room and make me sign autographs in another room by myself. That room was on the complete other side of the convention - as far from him as possible.
16. I believe he did this in retaliation for my rejection of his sexual advances because he knew that all the fans would stand in his line and nobody would walk over to see me, which is exactly what happened. This also increased my fear that he would try to harm my career.

17. On that same Sunday, several of the volunteers began to confide in me about their experiences with Mignogna. These experiences included Mignogna yelling at staff, creating impromptu autograph signings in hallways that would create fire hazards, and making his liaisons cry. I'd hear these stories repeated by various staff at conventions I would attend from that point forward.
18. In the time since ShadoCon, I have told my mom, FUNimation employees, other voice actors, and many of my friends about what Mignogna did to me, and how scared I was of further retaliation.
19. I read Mignogna's statement that he made for the i09 article about his sexual harassment allegations and that he said we drank wine together in my hotel room and "made out" at ShadoCon. This is a lie and it did not happen. I have never consensually kissed Mignogna, and I did not drink wine with Mignogna in my hotel room. I have spent the past several years being very cautious about placing myself in a situation where I would be alone with Mignogna again.
20. In 2012, Mignogna contacted me to talk about a project he was casting. Mignogna told me he wanted to cast me in the role of Dr. McKennah in his new Star Trek web series. He told me he couldn't imagine anyone else for the role. He asked me to film a few test shots on my own from my house, so they could use them for storyboarding. For many weeks, I believed I had been cast and began to clear my schedule for filming. He contacted me about a month later to tell me that his fiancée, Michele, had become enraged and filled with jealousy and demanded I be let go, and that she be cast in this role. Many years later, I would learn from Michele that she never had any idea I'd ever even been considered for the part. She told me the one and only time we met, in Denver, that she had wished we could have become friends. I realized I had been lied to by Mignogna - I was never actually cast in the role, and I felt quite embarrassed

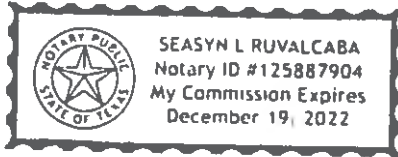
at my naiveté.

21. I now try my best to avoid Mignogna, and avoid working with him. For example, last year I received a call from FUNimation for a voice acting project. It is common for FUNimation to send you a text for work and schedule a day and time to show up without any more details about the project. When I arrived at FUNimation, I learned for the first time that it was for a project Mignogna was directing. During the recording session, I heard Mignogna repeatedly tell the engineer how talented and amazing he thought I was to try to woo and impress me. I felt uncomfortable. After the recording session ended, he sent me a text asking me to get dinner. I responded by saying yes, to protect myself from fallout, but I had no intention of meeting him for dinner and did not see him again following that message. When FUNimation contacted me to set up another session with Mignogna, I asked for a different director, and they complied.
22. Prior to learning that Mignogna had been fired from FUNimation this year, I sent a written statement to Colleen Clink and Trina Simon at FUNimation telling them about the advances, assault, and harassment that I endured and letting them know if there is an investigation, I would like to help. I have attached this email and my statement as Exhibit A and represent that it is a true and correct copy of these documents. I learned after I sent my statement to FUNimation that Mignogna had already been fired.
23. I have turned down three convention invitations this year already because Mignogna planned on attending the same conventions. I did not want to attend these conventions, because I am scared of his fans and of their harassment. I am scared of retaliation from Mignogna. I have lost a substantial amount of income by not attending these shows. I have been a victim of doxing by his fans online on a website called Kiwi Farms. Kiwi Farms is a website that is known for encouraging the harassment, bullying, and stalking of individuals. Private

information about where I live, my date of birth, and other information about me has been posted on Kiwi Farms in attempts to incite others to stalk, bully, harass, and intimidate me. I regularly receive harassing messages on social media from Mignogna's fans. I was recently told by one of Mignogna's fan to "continue to keep my mouth shut."

24. This concludes my affidavit testimony.

Executed in Dallas County, Texas on July 16, 2019.



Kara Edwards

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED AND SWORN TO BEFORE ME on this 16th day of July 2019.

Seasyn L Ruvalcaba
Notary Public, State of Texas

Seasyn L Ruvalcaba
Printed Name

My Commission Expires: 12-19-22

EXHIBIT A

From: Kara Edwards

Sent: Friday, February 8, 2019 4:22 PM

[REDACTED]

Subject: Sexual Harassment by Vic Mignogna

Trina,

My name is Kara Edwards. I've been a voice actor for Funimation since 1999. I received your name from several people. Over the past 10 years, I've had several "run-ins" with Vic Mignogna. I've typed out a statement with the things I can remember- though new memories keep popping up the more I speak to various witnesses that were there for our interactions. Please forgive any typos, as I wanted to get this together quickly before I pick my little one up from school.

If you have any questions, please feel free to contact me at the number below. I'd like to assist in any investigation that might be taking place.

Thank you for your time.

Kara Edwards
Free Spirit.

[REDACTED]

Studio Thirteen13 Photography
www.karaedwardsphotography.com

To Whom It May Concern,

In 2008, I attended a convention in North Carolina called Animazement. There, I met a voice actor named Vic Mignogna. It was a friendly interaction and we did several panels together. During one panel, he grabbed my leg during a funny moment- he then slid his hand high up my thigh, which I thought was just in jest. At a later panel- he seductively grabbed me in a "tango" dance move. I thought it was all a show for the fans- so I laughed it off. In hindsight, I realize those were his first "moves". On the final night of the convention, we walked to our hotel rooms (which were next door to each other) together. He hugged me, which seemed normal at first- but the hug became more intimate and lasted a long time. I became very uncomfortable. I was finally able to pull away and I went inside my room. After a few minutes, I heard a light knock on the door in between the two hotel rooms. After several light knocks, they began to get louder and louder. I was frozen, as I knew it was Vic knocking on the door. Then they stopped. My hotel phone rang. It was Vic. He asked me to unlock the door and let him in, "It'll be our little secret". I reminded him that I was married and made a few light hearted jokes to ease the situation. I wished him a good night. A few minutes later, the knocks began again. He began calling to me through the door, "Let me in, Kara. You know you want this." I ran into the bathroom and turned on the shower. I sat on the bathroom floor for almost an hour with the shower running. The next morning I flew home.

A couple of years later, I attended a convention called ShadowCon in Florida. At this point, I had run into Vic a few times at Funimation- and despite hugs that lasted too long and a few leering stares, I wasn't too concerned for my safety. Almost immediately, Vic found a way to corner me, alone. He asked me to swing by his hotel room on our way to a panel to get something he forgot. There wasn't anything. He sat on the sofa in the room and motioned for me to sit in the chair nearby. He wanted to see how I was doing since he knew I was going through a divorce. We talked casually, then he put his hand on my leg and began rubbing my thigh. I stood up and said we needed to go. He walked around in front of me- blocking me from the door. He got on his knees in front of me and grabbed my legs- rubbing my back thighs. He said, "Let me be sweet to you." I was frozen momentarily but said again that we needed to go. He became more insistent, standing up and pressing his face to mine- whispering, "let me be sweet to you." I broke away and left the room. I immediately reported this to the head of guest relations- Mary Reese. She said she'd stay with me personally so I couldn't be cornered again- which she did. During this convention, I observed Vic yelling at con staff, creating constant scenes at every turn. When it came time for our autographs- he insisted I be moved to a different room, ensuring all of the fans would go to him and not me. I saw this as "punishment" for my actions and told Mary I feared for my career- as Vic was very powerful.

I can't remember the dates/locations of these events- but I do remember the events. At one con, I met Vic's fiancé, Michelle. She was very rude to me. Vic made it a point to tell me, "She's so jealous of you. She knows how attracted I am to you." I was so uncomfortable and made a point to speak to Michelle many times over the weekend, trying to assure her I had absolutely no interest in Vic. The next con I saw Vic at, he was again hitting on me. Trying to push him away while still being "kind" (as us southern women are taught to do) I said, "Vic- I know your fiancé". He responded, "Come on, you don't know her that well." This was our usual interaction- him coming on to me and me trying to push him off.

A bit later, Vic contacted me to see if I was interested in joining his Star Trek series as a one time guest. I auditioned and was cast in the role of Dr. McKenna. When he was in town, we met for dinner to talk about the part. I was careful to keep professional boundaries- which clearly annoyed Vic. A short time later, Vic called to say he had recast the role and was giving the part

to his fiancé Michelle. He told me she was so jealous of me, that she wouldn't allow me to work with him.

My final interaction with Vic was last year, when he cast me in a small part in an anime he was directing. When I got in the booth, he made a point to shower praise on me to the engineer. It was very awkward, and reminded me of the many times over the years he made me feel uncomfortable or afraid.

I absolutely believe the allegations against Vic. I believe them because of my own experiences with vic's sexual harassments and come-ons. I do not ever want to see Vic Mignogna again and will not attend any convention or work for any company that hires him moving forward.

Furthermore, I've told these stories to dozens of people over the years. Actors, producers, con chairs, engineers- and I've never been heard. I'm thankful that people are finally listening, but I'm gutted to realize how many of us had to be victimized to get here.

I hope appropriated action is taken, immediately.

Sincerely,
Kara Edwards

EXHIBIT D

AFFIDAVIT OF LYNN HUNT

STATE OF CALIFORNIA

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COUNTY OF LOS ANGELES

Before me, the undersigned Notary Public, on this day personally appeared Lynn Hunt, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Lynn Hunt. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I have worked in the anime convention business since 2000 and have held the following positions at these conventions: ADH/DH Panel Programming, ADH/DH Guest Relations, DH Video Programming, DH Convention Operations, and Contest Coordinator. I have encountered Victor Mignogna ("Mignogna") on many occasions due to my employment at anime conventions all over the United States. I have personal knowledge of Mignogna's reputation at anime conventions, and I know him to be a high-risk guest, and we always worked to monitor his interactions with young girls and females carefully. I also know Mignogna to be difficult to work with, and he tends to demand a significant amount of attention from staff and convention organizers. I also know Mignogna to be rude to staff at conventions, and rude to other celebrity guests.

3. My first encounter with Mignogna was in 2003 when I was working at Ohayocon in Columbus, Ohio in convention operations. Ohayocon is an annual convention for anime fans and enthusiasts. During this Ohayocon, I witnessed multiple instances of Mignogna inappropriately touching fans, guests, and other convention patrons. I witnessed multiple guests look uncomfortable after Mignogna touched them. Additionally, I heard over the radio channels

between Chayocon staff and security that someone should step in and say something to him about his inappropriate touching of fans. I believe that many of the girls Mignogna was touching inappropriately were under the age of 18.

4. In 2004, I was working in panel programming at Anime Central Convention in Chicago, Illinois. As part of my duties, I work directly with convention celebrity guests and technical professionals among others, to ensure the timely execution of events for fans on a strict schedule. A part of my tasks involved assisting guest relations with the celebrity guests with any special requests or needs regarding events. While working with Mignogna, I witnessed his extremely difficult behavior and temper tantrums with other staff. He was unprofessional to staff members and other celebrity guests to the point of disruption. I also witnessed Mignogna give his personal phone number to many young female fans, and inappropriately grope and kiss girls, many of whom I believe were underage. Mignogna made me feel uncomfortable because of his conduct.

5. While working at the Anime Central Convention in 2005 in panel programming, I received numerous complaints from other staff and convention guests about Mignogna's behavior. Mignogna frequently took too much time during his panels, cutting into other guests' scheduled panels, and treated our staff and handlers poorly. It was around this time that many celebrity guests requested from me that Mignogna not be placed on their panels, regardless if he was an announced guest or not. After the Anime Central Convention in 2005, Mignogna was banned from attending future conventions due to his inappropriate behavior. It would also come to my attention at a later date that Mignogna's attendance that year was due to him circumventing the invitation channels rather than a desire to have him return following the events involving Mignogna from the prior year in 2004.

6. In 2004 at Tekkoshococon when I was working as contest coordinator, Mignogna was

a guest. Again, Mignogna's aggressive behavior with convention staff (including yelling and screaming, sexual harassment, and lack of respect for other convention guests) and were all cited in reasons why Mignogna was to be banned from returning to the convention in subsequent years.

7. In 2007, Mignogna was brought back as a guest to Tekkoshococon due to his popularity as a character voice in the anime show "Full Metal Alchemist," despite the concerns I voiced to my superiors. During his attendance, Mignogna took an interest in a female Japanese singer named Mari Ijima. He constantly made sexual advances and followed Ms. Ijima to the point that the convention chairs, Jim Gogal and head of security, John Praeger, had to move her hotel room secretly and assign security detail to her with specific instructions to keep Mignogna away from her.

8. Also, during Tekkoshococon in 2007, Mignogna went missing for several hours during the Saturday of the convention where staff was unable to contact him. I was part of the staff trying to locate him during this convention. We ultimately located Mignogna in his hotel room with an underage female by themselves. After this incident, Mignogna was banned again from attending Tekkoshococon.

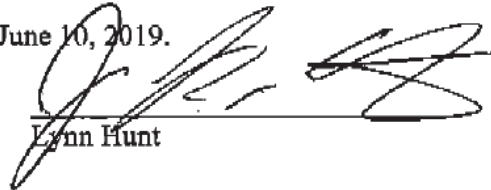
9. In 2009, My role in guest relations included the invitation of American guests and management of guest handlers and drivers. Similar to 2005, Mignogna was invited back to Anime Central Convention by an individual outside of my department circumventing my authority as well as the ban instituted in 2005. As part of guest relations, I was assigned to handle Mignogna's requests despite my discomfort prior to the event and the concerns I voiced about his inappropriate behavior. Mignogna demanded numerous panels and autograph opportunities that were more than any of the other guests. I scheduled these events for him to avoid angering him and being treated poorly. During the Saturday of the convention, Mignogna stated that he was tired due to his

overloaded schedule and wanted his schedule adjusted to avoid another appearance. I radioed my fellow coworkers and was able to cancel his upcoming event. After I received confirmation that his event had been canceled, he turned to me and hugged me in the green room and to my shock, he squeezed my rear end. I did not consent to being touched in this manner, and felt violated and extremely upset after.

10. Shortly after 2010, I stopped working in anime conventions. One of the main reasons why I left was the behavior I had to endure from Mignogna. Everyone knew how inappropriate he was with women and his bad reputation, yet people would turn a blind eye because he had many fans at the time willing to pay to see him. I have received many apologies over the years from fellow coworkers and superiors about the behavior that I endured while managing Mignogna

This concludes my affidavit testimony.

Executed in Los Angeles County, CA, on June 10, 2019.


Lynn Hunt

SUBSCRIBED AND SWORN TO BEFORE ME on this 10th day of June 2019.




Notary Public, State of California

JUNSOO KIM
Printed Name

My Commission Expires: Mar 28, 2023

EXHIBIT E

AFFIDAVIT OF FAISAL AHMED

STATE OF GEORGIA

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COUNTY OF GWINNETT

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Before me, the undersigned Notary Public, on this day personally appeared Faisal Ahmed, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Faisal Ahmed. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I am the CEO of the Kawaii Kon Convention and Anime Weekend Atlanta held in Atlanta, Georgia. I initially met Victor Mignogna (“Mignogna”) on September 25th, 2004 at Anime Weekend Atlanta.

3. I have known about Mignogna’s bad reputation with women and convention staff for many years. Around seven years ago, I was attending the Anime Central Convention in Rosemont, Illinois, and I saw Mignogna being overly friendly with a female cosplayer near the FUNimation booth. The cosplayer looked very uncomfortable with his actions, and I witnessed her tell Mignogna that she needed to go. I then witnessed the cosplayer quickly try to run away from Mignogna, and it appeared to me that she was removing herself from the situation to avoid a confrontation. I went to Sarah Sullivan, an employee at FUNimation at the time, and reported what I saw. Sarah Sullivan told me that this was normal for him. In response, I told her that if it happened at one of my conventions and shows, then I would not allow him back. Sarah Sullivan looked extremely exhausted and told me that I can make a complaint about it if I wanted to. I told her “okay.” I did not hear anything afterwards about my report regarding Mignogna.

4. I have received complaints from attendees at Anime Weekend Atlanta and Kawaii Kon about Mignogna. For example, about four years ago at the Anime Weekend Atlanta, one of

our volunteers, Erica McCord, in guest relations was also Mignogna's personal handler/assistant. She would fly with Mignogna and accompany him to other conventions as well as the Star Trek Continues set. This volunteer was a die-hard fan and an admirer of Mignogna, and I witnessed her defend him anytime someone complained about him being a diva or too demanding. However, one day she came up to me and said that while she loved Anime Weekend Atlanta and wanted to keep volunteering in guest relations, she requested not to be assigned to Mignogna or work with him directly anymore. She stated that "he was not who I thought he was," and when I pushed for more details as to why she felt that way, she was hesitant and uncomfortable to say anything. I believed that she was too scared to say anything further, so I dropped the matter. I learned from someone else last year that Mignogna had forcibly kissed her without her consent, and I believe this is why she did not want to work with him. While I was frustrated she did not tell me this sooner, I understood why she was hesitant to tell me because she knew I would not allow to invite him back to Anime Weekend Atlanta ever again.

5. I have also received complaints from attendants at the Kawaii Kon Convention. One complaint was from attendee, Kelly Loftus. Kelly emailed me and stated that Mignogna was grabby and touched and kissed her without consent, and she did not know what she should do. I have attached the emails I received from Kelly on January 28, 2019 to this statement as Exhibit A. Another complaint was from attendee, Leah Hamilton—also known as Leah Rose—who is a cosplayer. Originally, I knew Leah admired Mignogna, but he aggressively pursued her despite her rejecting him and both of them being in committed relationships. Leah publicly announced this incident and there was an enormous amount of media backlash against her and Kawaii Kon from Mignogna's fan base, also known as the "Vic Risembool Rangers."

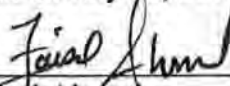
6. Due to the two incidents at Kawaii Kon, the incident from Anime Weekend Atlanta,

the incident I witnessed at Anime Central Convention, and other poor behavior we witnessed from Mignogna, I and the other management staff voted to ban Mignogna from Kawaii Kon and Anime Weekend Atlanta in the future. Neither Monica Rial, Jamie Marchi, Ron Toye, or FUNimation have contacted me to request that I ban Mignogna from any convention. I am not aware of any signed contract with Mignogna that guarantees Mignogna's appearance at Kawaii Kon or Anime Weekend Atlanta. The invitations for Mignogna to attend Kawaii Kon was made in the sole discretion of the management staff and could be withdrawn at any time without penalty.


7. Because I have independently agreed with Leah Rose and other victims, I have been targeted, stalked, and harassed by fans of Mignogna. For example, on April 4, 2019, a little before Kawaii Kon convention started, I received roughly 500 spam emails during a two hour period. I was also contacted by the State of Hawaii, because they received a complaint from one of Mignogna's fans because we banned him from attending. I had a meeting with the Management of the Hawaii Convention Center to discuss the complaint.

8. This concludes my affidavit testimony.

Executed in Gwinnett County, Norcross, Georgia on July 12, 2019.


Faisal Ahmed

SUBSCRIBED AND SWORN TO BEFORE ME on this 12th day of July 2019.


Notary Public, State of Georgia

Haile Kahssu
Printed Name

My Commission Expires: 11/30/2023

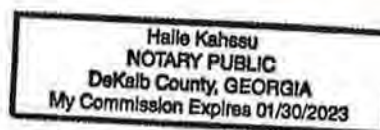


EXHIBIT A

From: **Kelly Loftus** [REDACTED]
Date: Sun, Jan 27, 2019 at 10:51 PM
Subject: My sexual harassment incident with Vic Mignogna (Twitter reply - @kellyonelani)
To: <info@kawaiiKon.com>

Hello,

Thank you very much for responding to my tweet about my incident with Vic. <https://twitter.com/KawaiiKon/status/1089598327681961984>

Here is the original tweet where I tell my story:
<https://twitter.com/kellyonelani/status/1086014744736149504>

A few days later, Vic put out a public "apology" response on his Twitter and has said that "all sexual harassment allegations are completely and utterly false" which is not true. I wasn't a fan of his, I was a complete stranger when he talked creepily to me, grabbed and held me in a tight embrace pushed up against his body, and then kissing my cheek. Before the last parts happened I remember being uncomfortable and just thinking, "Is something wrong with you? I'm here for my friend. I'm not a fan of yours." And since then he has been telling his fanbase (from his Discord server) to go out to defend him, a 56 year old man, and go after accusers. It has been pretty awful for me since then, to say the least.

If you haven't seen other people's stories, there is a hashtag on Twitter called #KickVic - you can find all sorts of first-hand accounts with Vic and it's not just sexual harassment accusations like mine, some are far far worse. These stories have been going on since 2005 (a good friend of mine has known this since the beginning, thankfully nothing has happened to her). I have industry friends too (English dub voice actors, con staff, a translator at Funimation, etc) who all know of Vic's bad reputation and sadly can't say anything publicly. He has also already been banned from a number of conventions over the years. This isn't just some new thing or because the new DBZ movie (that he voices in) just happened to coincidentally come out. Speaking of DBZ too, the voice of Goku (Sean Schemmel) also has been publicly "liking" a number of #KickVic tweets: <https://twitter.com/hanleia/status/1089041109819355137>

Here are some other details:

- This happened at Kawaii-Kon 2014, I was 27 years old (a lot of other people's incidents happened when they were minors)
- It was my first year tabling at your Artist Alley (and I've tabled every year since then, I won't be tabling at 2019 though since I'm trying to cut back on cons)
- I tabled under the artist name: "Onelani" (my full name is Kelly Onelani Loftus - I'm hapa-haole, btw)
- It happened on Day 1, and I was cosplaying Ren Mihashi from "Big Windup!" (the only time I ever wore that cosplay at your convention)
- I asked him to sign a box of chocolate macadamia nuts for my friend (she doesn't have the box anymore, but there's a good possibility she kept the original plastic wrap for it)



- I have two pictures, one before the kiss+embrace, and when he did it (I remember saving it on my old laptop but it has died since then, I could try to dig it up. I also still have my old iphone where it was taken on; I'm currently in Tokyo right now but I can try to reboot it after I return home and see if the picture is still on it)

If there's anything else I can do, please let me know. The reason why I came out with my story is because I saw the new wave of stories coming out and saw some people dismissing them, saying stuff like, "well you were a fan, so you wanted it" (a lot of the victims were minors at the time). I really felt it was important I finally said something because he has been getting away with everything for far too long, it really needs to stop. And I don't want someone else going through what I did.

Again, thank you very very much for responding to me and giving me this chance to email you and explain everything.

Mahalo,

Kelly

EXHIBIT F

AFFIDAVIT OF MARY REESE

STATE OF FLORIDA

§

COUNTY OF HILLSBOROUGH

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Before me, the undersigned Notary Public, on this day personally appeared Mary Reese, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Mary Reese I am over 18 years of age. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I have worked numerous anime conventions for over 13 years in guest relations. I am Special Guest Coordinator at the METROCON Convention in Tampa, Florida.

3. I first met Victor Mignogna ("Mignogna") in 2010 at the ShadoCon Convention in Tampa, Florida. ShadoCon was a new convention at the time. I have been Mignogna's assistant and handler at several anime conventions for about 9 years. I am assigned to handle Mignogna at conventions because of my age, and I have personal experience watching him interact with fans and young girls, in particular, and I know what he is capable of.

4. Mignogna likes to make advances on females in their early 20's and younger. When I first met Mignogna, I actually thought he was gay based on his mannerisms, but soon learned that this was not the case, and I believe that is just an act to trick females to trust him more.

5. I have witnessed Mignogna change his voice and behavior depending on who he is speaking with. When he is talking to his fans, he changes his voice and demeanor to play one of the characters he voices or tries to sound feminine making himself seem non-threatening;

however, when fans are not around, he changes his voice and personality to someone that is very different than what the fans see.

6. I have personally driven Mignogna to and from airports for conventions. I recall picking him up from the airport for the ShadoCon Convention where I witnessed diva type behavior. His wheel on his suitcase was broken and he acted as if this was a very traumatic experience for him and made a scene insisting it be taken care of immediately, causing a significant delay in the departure from the airport. There were two additional guests who were affected by the delay. Mignogna is very demanding and requires everything to be taken care of for him by assistants. This includes buying items for him like food and drinks, which he often does not reimburse the liaisons and handlers.

7. Because I have worked directly with Mignogna many times, I have seen his personality and how he treats others. Mignogna is a bully and makes unreasonable demands. I have witnessed him yell at staff about trivial things to the point that he makes them cry. I remember in 2017 at METROCON, I was assisting him with his autograph line. Mignogna required that I ask every fan to buy more merchandise directly from him and upsell them before he would meet them. Mignogna thought I had missed upselling one fan and became upset with me. He rudely and aggressively reminded me that I need to upsell to every single fan that enters his autograph line to buy his personal merchandise and CDs.

8. At the ShadoCon Convention in 2010, I also met Kara Edwards. Kara is a voice actor and actor, and worked with Mignogna on a few shows. Kara was a newer voice actor in the anime community at the time. On the Saturday of the convention, Kara and some friends went out to dinner. After dinner, I was talking to Kara in the hotel lobby and she was saying goodbye for the evening. Mignogna came over to us and demanded that he escort Kara up to her room. He

slide in between us, grabbed Kara's arm and proceeded to take her to her hotel room on the premise of being her protector. I noticed that Mignogna had an interest in Kara that weekend and was constantly trying to locate her and flirt with her.

9. Kara confided in me the next morning and told me that Mignogna tried to force himself on her, and she reminded him that he was engaged to Michele Specht at the time, but he indicated that his engagement did not matter. She also relayed to me that Mignogna said something to the effect of she might as well just enjoy their time together because he had the power to make or break her in the industry. Also, if she was nice to him she could become very well known, or not be nice and watch her career disappear. She was so shaken because he kept reminding her that he had the connections and the power and she was nothing.

10. When I spoke to her she was very upset at the time and was fearful for her career. Kara was worried that Mignogna would try to ruin her career if she said anything publicly. I asked Kara to report the incident, but she was too scared.

11. The same morning at ShadoCon, Kara and Mignogna were scheduled to have an autographing signing together. This was very helpful for Kara's career, because Mignogna was a big star at the time and had lots of fans, and she was just starting out her voice acting career.

12. I was personally present when Mignogna demanded at the last minute that Kara's autograph table be moved into another room. This decreased her visibility from meeting new fans as a result.

13. I have also witnessed Mignogna grab Kara Edwards by the back of the head, pull her hair and her head backward forcibly. Mignogna was flirting with Kara and pulled her back suggesting that they pose as if they were on the cover of a romance novel. Mignogna then asked me to quickly take a picture of this pose. I witnessed Kara lean herself back as far as she could

from Mignogna to avoid getting a possible kiss from him. I believe she allowed the picture to be taken to avoid causing a scene.

14. I also recall on the Friday evening of the ShadoCon convention, Mignogna requested that I follow him up to his room after dinner. He told me that he wanted privacy, to be left alone, and wanted me to help keep away fans. About 30 minutes after I escorted Mignogna to his hotel room, I was called to the hotel lobby via radio to witness him playing piano with several young girls around him and a crowd gathering.

15. After the news articles were released online about Mignogna's sexual assault and harassment allegations, I have received complaints from fans of Mignogna requesting METROCON to invite Mignogna back to its convention and withdraw its invitation to Monica Rial.

16. In 2017 after the METROCON Convention guests were saying goodbye to staff in the guest green room he asked to take a picture with me. I did not want to take a picture with him, but agreed to so that he would not become upset. We took a photo together and he pushed his cheek next to mine while embracing me. After the first photo, Mignogna stated he did not like it and wanted to take a second photo. Mignogna then kissed me on my temple as he snapped the picture. I did not consent to this. I did not want to be kissed or embraced by Mignogna in any manner.

17. I am very relieved to hear that people are finally speaking publicly about Mignogna and how horrible he has been to work with over many years. Mignogna has a bad reputation as a voice actor and in the convention industry as a guest.

18. This concludes my affidavit testimony.

Executed in Hillsborough County, Tampa, Florida, on July 16, 2019.

Mary Reese
Mary Reese

SUBSCRIBED AND SWORN TO BEFORE ME on this 16th day of July 2019.

Sunny Garlits
Notary Public, State of Florida

Sunny Garlits
Printed Name

My Commission Expires: 2/10/23



EXHIBIT G

disrespectful to staff members without reason. I witnessed him exchange more disrespectfully with women staff members than with men.

4. During my employment at Tekko, I also witnessed Mignogna touch young female guests and male guests during autographs sessions in a manner that I believe was inappropriate. He was very handsy with guests (females and sometimes males) and I did not witness him ask for consent. Several guests directly approached me after meeting Mignogna and stated that they felt uncomfortable after he touched them. I directed these guests to security officers at the convention to report the incidents. The physical "affection" from Mignogna I witnessed consisted of very close and tight hugs, longer than normal hugs, moving his hands down towards the lower backside of a female, and grabbing a woman's hair. I witnessed numerous guests look uncomfortable and scared during their exchanges at Mignogna's autograph table, and so much so, that I requested a security guard to stand next to him to monitor his behavior after a few of these episodes.

5. Mignogna went missing several times during Tekko in 2007, and our staff had difficulty locating him. Mignogna was provided a schedule of his appearances, and he disobeyed this schedule causing disruptions of the schedules for other celebrities and attendees at the convention. About 30-45 minutes prior to a question and answer panel that Mignogna was to attend, myself and other staff at Tekko could not locate him. Many staff members, including myself, were searching for him at the convention. The staff members looking for Mignogna had radios to communicate with one another directly. Around this same time, I heard on the radio that a group of parents located a security officer and asked for assistance with locating their daughters who were missing. They were about 14 years old. I was listening to my radio to see if another staff member had located Mignogna or the girls yet while I was looking for them, too. I heard on my radio another staff member state that he located Mignogna and the three underage, teenage girls in

Mignogna's hotel room alone with him.

6. I learned that Mignogna wanted special time with these girls, and promised he them access to props from his show "Fullmetal Alchemist" that he had in his hotel room, with a special photo shoot. After being located in his hotel room, I witnessed Mignogna's behavior and he appeared extremely angry and his attitude was disturbing to me. His face was red, and he appeared to have been either screaming or crying, or both. Mignogna was incredibly rude to me and kept repeating that he hadn't "done anything wrong" or "done anything to them." I had not accused him of anything yet at this point, and I believe his behavior was suspicious. I believe the parents and teenagers received free admission for the weekend from the convention as an apology, and the parents decided not to press charges. After this event, I witnessed Mignogna trying to escape his handlers and security whenever he had a chance, and myself and my co-workers struggled to make him attend the events he was contracted to attend. I believed Mignogna was high-risk and was worried he would try something with other underage and young females again. I ordered staff to always have one to two people with him at all times.

7. Also, during Tekko in 2007, I organized a question and answer panel titled "Fullmetal Forum," and despite my hesitancy, I asked Mignogna to join the panel due to his popularity in the show "Fullmetal Alchemist." Prior to the panel presentation, I provided Mignogna an outline and questions about how the panel discussions would be organized. Shortly after the panel began, Mignogna decided to ignore the outline and disrupt the panel with his own statements and go off topic with comments about other voice actors related to the show. Mignogna would disrupt me during my questions and tell me that my topics "weren't interesting." I saw Mignogna open up the panel to the audience for questions about himself, and which I believe upstaged the other panelists and my moderating. I tried my best to keep the panel on topic, but I

eventually gave up. When I left the panel, I witnessed Mignogna requesting for another autograph session, despite requests from me and security telling him he needed to clear the room for the next event. I believe that Mignogna did not have any concern for the convention schedule and other celebrities, and was more concerned about his own fandom and attention.

8. Additionally, during Tekko 2007, Mignogna at the lastminute requested a special room on the Sunday of the convention to hold a religious service and for him to speak. I did not have any larger rooms available because they were already scheduled for other events. I did provide him a room for this service and accommodated his last-minute request, but I witnessed Mignogna complain and mock the location I reserved for him because it was not a more grandiose conference room. I heard him mention comments to the effect that he believed Tekko hated Christians because of the size of the room he was given, and that he was going to revolt and take over the largest conference room regardless of what was scheduled. The religious service turned out to be another opportunity for Mignogna to talk about himself, and as a Christian myself, I do not believe it was a religious service.

9. Mignogna was not asked to return to the convention for several years due to his behavior. When Mignogna was allowed to return to the convention in 2010, the convention required security detail on him at all times.

10. There are more events that happened during Tekko in 2007 involving Mignogna that I was told about from others which I believe are also inappropriate and disturbing, however, I did not witness these events first-hand as the other events in my testimony.

11. This concludes my affidavit testimony.

Executed in Allegheny County, ^{Commonwealth}of Pennsylvania, on June 14th, 2019.

Whitney Falba
Whitney Falba

SUBSCRIBED AND SWORN TO BEFORE ME on this ____ day of June 2019.

Stefanie J. Budosh
Notary Public, State of Pennsylvania

Stefanie J. Budosh
Printed Name

My Commission Expires: May 19, 2020

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Stefanie J. Budosh, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires May 19, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

EXHIBIT H

AFFIDAVIT OF NEYSHA PERRY

STATE OF ARIZONA

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COUNTY OF Maricopa

§

Before me, the undersigned Notary Public, on this day personally appeared Neysha Perry, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Neysha Perry. I am of sound mind, competent and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. On June 29, 2013, I met Victor Mignogna ("Mignogna") for the first time at the Bayou Con in Lake Charles, Louisiana. Bayou Con is an annual convention for comic, anime, science fiction, and fantasy fans and enthusiasts. I was asked to be a guest at the Bayou Con to perform with my three other friends as part of our act called "Orion's Evny." Orion's Envy is a performance and dance group that is made up of is made up of women who dress up as female Orion characters (the number of dancers in the group changes often) from the hit TV show Star Trek.

3. After a performance at Bayou Con by Orion's Envy, Mignogna held a panel discussion and viewing of "Star Trek: Continues." During this panel presentation, Mignogna sat down in the audience with us without our request or permission. Mignogna pulled up a chair at the end next to Dayna Price, a member of Orion's Envy at the time. I witnessed Mignogna put his hand on Mrs. Price's leg and stroke her leg without her permission or consent. I witnessed Mrs. Price repeatedly try to cover her leg and she looked very uncomfortable.

4. After the panel that evening, I and the rest of Orion's Envy were invited to a party at the hotel of one of the producers of the Bayou Con named Justin Toney. This party was attended by numerous staff members and other guests at Bayou Con. During this party, I witnessed Mignogna walk up to Dayna Price, grasp her hair from the back with his hand, aggressively pull her backwards, and whisper into her ear. I did not hear what Mignogna said to Mrs. Price, but she was noticeably pissed, angry, uncomfortable, and upset. Mrs. Price did not consent to this. Mrs. Price was married at the time Mignogna made advances towards her.

5. After this incident, all the members of Orion's Envy decided to set up a buddy system to make sure that no one was ever left alone near Mignogna. I would be uncomfortable, anxious, and on edge if I were alone with Mignogna.

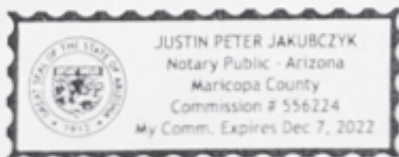
6. We spoke of this incident to friends. I have seen Mignogna since, and he has ignored us.

This concludes my affidavit testimony.

Executed in Maricopa County, AZ, on June 21, 2019.

Neysha Perry
Neysha Perry

SUBSCRIBED AND SWORN TO BEFORE ME on this 21 day of June 2019.



Justin P. Jakubczyk
Notary Public, State of Arizona

Justin Peter Jakubczyk
Printed Name

My Commission Expires: 12-07-2022

EXHIBIT I

AFFIDAVIT OF EMMETT PLANT

STATE OF ARIZONA §
 §
COUNTY OF MARICOPA §

Before me, the undersigned Notary Public, on this day personally appeared Emmett Plant, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Emmett Plant. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. On June 29, 2013, I met Victor Mignogna ("Mignogna") for the first time at the BayouCon in Lake Charles, Louisiana. BayouCon was a small convention. I recall this date very well, because this was the first time I met my girlfriend, Neysha Perry. I am a producer, composer and engineer and a frequent guest at conventions due to my work on the STAR TREK franchise.

3. Mignogna was also a guest at BayouCon that year. I had never met him before, and the first I'd heard of him was in BayouCon promotional materials. While Mignogna is known primarily as a voice actor, we work in completely separate areas of the industry. As a guest, I was able to meet Mignogna outside of the public-facing side of the convention. He seemed nice when we initially met. Another guest at the convention was Orion's Envy, a four-lady team of dancers and dance instructors that painted themselves head-to-toe in bright and glittery green, cosplaying as Orion slave girls from Star Trek's original series.

4. Mignogna, myself, and Orion's Envy were briefly gathered together outside the

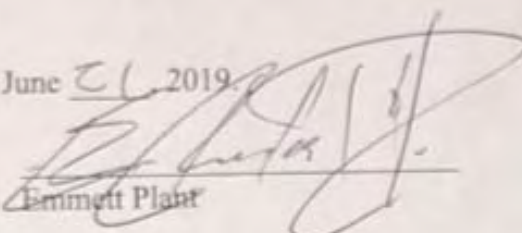
portico of a local hotel, heading toward an after-show off-site convention event. I witnessed Mignogna grab Dayna Price by the back of the neck and hair, pull her down, and hiss something into her ear. I felt that this was inappropriate and strange. Dayna Price did not consent to this and she looked very uncomfortable.

5. After this incident took place, Orion's Envy created a 'buddy system' to make sure that none of them were alone with Mignogna.

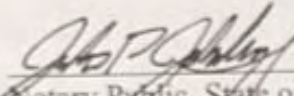
6. Since speaking out publicly about what I know about Mignogna, I have received messages and threats from fans of Mignogna stating Mignogna was "lawyering up" and I should be careful. I continue to receive threats and bullying messages from fans that are trying to harass and intimidate me, as well as misrepresent my professional career. I know that others have received similar harassment and threats from Mignogna's fans.

This concludes my affidavit testimony.

Executed in Maricopa County, Arizona, on June 21, 2019.


Emmett Plant

SUBSCRIBED AND SWORN TO BEFORE ME on this 21 day of June 2019.


Notary Public, State of Arizona

Justin Peter Jakubczyk
Printed Name

My Commission Expires: 12-07-2022



EXHIBIT J

AFFIDAVIT OF ADAM SHEEHAN

STATE OF CALIFORNIA §
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COUNTY OF SAN FRANCISCO §

Before me, the undersigned Notary Public, on this day personally appeared Adam Sheehan, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Adam Sheehan. I am of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I was an employee at FUNimation for at least 10 years and worked there from 2004-2014. The duties of my job at FUNimation included organizing and scheduling the attendance of talent and voice actors at conventions and public events, and brand management. I regularly spoke with organizers, employees, and attendees at conventions.

3. I first met Victor Mignogna ("Mignogna") at least 10 years ago. I worked with him directly on the anime show "Full Metal Alchemist." Mignogna was one of the voice actors on this show. Over the years during my employment at FUNimation, I scheduled Mignogna to appear at numerous conventions as part of FUNimation's marketing. I have also interviewed Mignogna for an online series of videos called "Inside the Voice Actors Studio." I have directly witnessed Mignogna's behavior at conventions, at FUNimation, and off-the-clock.

4. Overall, Mignogna does not have a good reputation in the voice acting industry. He is a talented voice actor, but he is very difficult to work with. Often, his talent is not worth the trouble of employing him. Eventually, his poor and inappropriate behavior outweighed his talent. I am personally aware of many studios who have chosen not to employ him on projects after

experiencing his difficult personality and well before FUNimation decided to no longer employ him. Mignogna would frequently contact me at FUNimation and at my current job with Crunchyroll requesting work as a voice actor on projects, and the ability to appear at conventions. This was surprising because typically the studio or convention would request a voice actor to be part of a project or attend a convention, rather than the voice actor looking for work.

5. I am aware of the employment status of voice actors at FUNimation. Voice actors at FUNimation are independent contractors. Mignogna was an independent contractor for FUNimation.

6. While I was employed at FUNimation, FUNimation installed a security lock system to separate employees from the voice actors and the recording studio. Other employees and I referred to the locks as "Vic Locks."

7. I was made uncomfortable by him at conventions and believe that he is very self-absorbed. Mignogna would behave very differently when he was around me because he knew that I had to the ability to report him to the higher-ups at FUNimation, and that I was also responsible for booking his convention appearances (i.e., more work) on behalf of FUNimation. I believe Mignogna has serial predatory tendencies. I heard countless stories from others about his inappropriate behavior at conventions. I witnessed Mignogna hugging, kissing, and touching fans (including minors) in a way that I believe is inappropriate. I have seen him interact with fans at conventions, and it appears to me that he intentionally puts his hands on women's bodies.

8. Mignogna would frequently attend less prestigious conventions, because he could dictate terms and because less powerful conversions would have less power to curb his misbehavior. For example, there is a convention in Houston called Anime Matsuri that has a bad reputation and has allegations of sexual harassment and misconduct. I try to avoid sending any of

the talents that I work with to this convention.

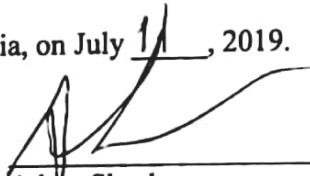
9. I have firsthand knowledge of how voice actors and other convention celebrity guests are compensated for attending. Typically, fans pay cash for merchandise, autographs, and photos that are sold by the voice actors.

10. Mignogna has a tendency to lie. For example, he told me he was close friends with the actor William Shatner. I am aware that William Shatner has publicly denied this. Mignogna also misrepresents his age and tells people he is younger than he really is.

11. I also used to be close friends with another voice actor named Todd Haberkorn who knows and works with Mignogna. I believe Todd's reputation is negatively being hurt by his association with Mignogna.

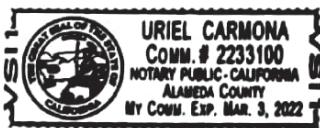
This concludes my affidavit testimony.

Executed in San Francisco County, California, on July 11, 2019.




Adam Sheehan

SUBSCRIBED AND SWORN TO BEFORE ME on this 11 day of July 2019.





Notary Public, State of California



Printed Name

My Commission Expires: March 3, 2022

EXHIBIT K

AFFIDAVIT OF KELLY LOFTUS

STATE OF CALIFORNIA

§

COUNTY OF ORANGE

§

§

Before me, the undersigned Notary Public, on this day personally appeared Kelly Loftus, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Kelly Loftus. I am over 18 years old, of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I have been attending to anime conventions since 2002. I am an artist, and frequently sell my artwork and other merchandise at anime conventions.

3. I first met Victor Mignogna (“Mignogna”) while I was working at my artist booth at the 2014 Kawaii Kon convention in Honolulu, Hawaii. I was 27 years old at the time. During the first day of Kawaii Kon, I was dressed as a boy in a baseball uniform in order to cosplay and anime character called Ren Mihashi from the anime show “Big Windup.” While I was not a fan of Mignogna, my friend was, and I noticed he did not have a line at his autograph booth. I took a box of chocolate covered macadamia nuts and walked towards his booth in hopes of getting the box signed for my friend. When I got to Mignogna’s autograph table, I proceeded to ask him to sign the box of chocolates for my friend because she, not me, was a big fan of his. He began hitting on me, using a seductive voice, and calling me things like “princess” even though I was in a boy’s baseball uniform. It was very uncomfortable, but I shrugged it off.

4. After he signed the box, we took a photo together as a way to show my friend “Hey, guess who I’m with!” I don’t recall if Mignogna asked for the picture or I did, but at the

time I thought it would be something my friend would appreciate. Mignogna was very handsy with me by grabbing me and holding me in a tight embrace flush against his body. That was the first picture. After taking the first picture I stated, "Well my friend's going to be angry," because I know that she would be jealous I met Mignogna. Then Mignogna said "'Oh, let's make her *really* angry." I did not know what Mignogna meant, and he told me to "look at the camera" again." He tricked me and gave me a big and long kiss on my cheek for the second photo. I remember thinking "is something wrong with you? I am here for my friend. I am not a fan of yours."

5. In January of this year, I noticed online that many women were coming forward with their stories of Mignogna sexually harassing and assaulting them. On January 17, 2019, I posted a message on Twitter telling the public about what happened to me at Kawaii Kon in 2014 (see Exhibit A attached). On January 19, 2019, I reached out privately to Kawaii Kon through their Twitter account to report the incident. I decided to make another post on Twitter on January 21, 2019 (see Exhibit B attached), noting that I too had an incident with Mignogna in 2014, and that I never received a response from Kawaii Kon after reporting it. A few days later, Kawaii Kon reached out to me via Twitter and requested me to tell them about my assault and make a report. I sent the CEO of Kawaii Kon an email on January 27, 2019 describing what Mignogna did to me in 2014 (see Exhibit C). Kawaii Kon proceeded to conduct its own investigation into Mignogna, and this investigation resulted in Mignogna permanently being banned from Kawaii Kon. I know this because CEO of Kawaii Kon sent me an email saying so.

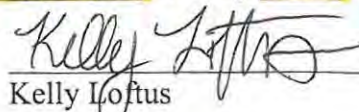
6. I decided to share my story online of what Mignogna did to me because I saw all the backlash that other victims were receiving from Mignogna's fans, and I did not think this was right. I also did not want another person to go through what I did, and wanted to warn the public.

I thought that what I experienced was rare, but learned later that countless women (including minors) have had to endure similar inappropriate and unwanted hugs and kisses from Mignogna. These women are being called liars, harassed, stalked, and bullied for sharing their bad experiences with Mignogna online.

7. Due to his celebrity status among anime fans, Mignogna's name and reputation is discussed a lot in the public. I have heard numerous opinions and stories about Mignogna over the years about his bad reputation and various things he does that are inappropriate.

8. This concludes my affidavit testimony.


Executed in LAGUNA NIGUEL County, ORANGE, on July 16, 2019.



Kelly Loftus

SUBSCRIBED AND SWORN TO BEFORE ME on this 16th day of July 2019.

(SEE ATTACHED)
JURAT



Notary Public, State of CALIFORNIA
ATISHI HARIVADANBHAI PATEL, NOTARY PUBLIC
Printed Name
My Commission Expires: 05/10/2020

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

Kelley Loftus

 Signature of Document Signer No. 1

 Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
 County of ORANGE

Subscribed and sworn to (or affirmed) before me
 on this 16th day of JULY, 2019,
 by KELLY LOFTUS
 (1) _____



(and (2) _____),
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature A.H. Patel

 Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: AFFIDAVIT OF KELLY LOFTUS

Document Date: 07/16/2019 Number of Pages: 3/3

Signer(s) Other Than Named Above: _____

EXHIBIT A



Kelly Onelani

@kellyonelani

Follow



Been seeing all the V** M***** stories, and I have one as well (will delete later):

Years back, I went to go get his autograph FOR A FRIEND (and I told him this) and he talked in a creepy "seductive" voice and would call me things like "princess" and such, it was very uncomfortable but I shrugged it off. After the autograph, I (regrettably) asked for a pic with him (as a way to show my friend, "hey guess who I'm with") and after the pic I joked "well my friend's gonna be angry" and then he goes "OH let's make her REALLY angry" and without my consent he wrapped his arms around me and planted a sloppy kiss on my left cheek. I tried to be nice, laughed it off, and walked away but it was like DUDE WHAT THE ACTUAL FUCK ugh

1:37 PM - 17 Jan 2019

120 Retweets 565 Likes



78

120

565



Kelly Onelani @kellyonelani · Jan 18



Again, gonna delete these, but if you want more info:

- I was 27 when this happened
- I want to emphasize I WASN'T A FAN and didn't act like a fan when approaching him, the autograph was for my friend
- I had two pics taken, one before the kiss and when he did it

2

1

106

EXHIBIT B



Kelly Onelani

@kellyonelani



.@KawaiiKon 2014 was where my incident with this guy happened, I have contacted the con and have yet to receive a response. I hope 2019 is the year we stop having him on guest lists, I'm not just upset anymore, I'm angry #KickVic

Missy Peña @misspenart

Here are all the cons Vic is going to in 2019. Please stop inviting this sexual predator to your events: @SacAnime @ichibancon_nc @BakAnime @Animemilwaukee @KamiCon @KawaiiKon @RangerstopCon @animenyc #KickVic #MeToo

twitter.com/eijilynx/statu...
Show this thread

11:42 PM - 21 Jan 2019

17 Retweets 74 Likes



1



17



74



Kawaii Kon @KawaiiKon · Jan 27



Replying to @kellyonelani

We are so sorry to hear you had an incident with Vic. Can you send your information to info@kawaiikon.com? I want to be sure we have a record of it.



1



1



Kelly Onelani @kellyonelani · Jan 27



Thank you, your response means a lot. I will send you an email soon.



1



EXHIBIT C

From: **Kelly Loftus** [REDACTED]
Date: Sun, Jan 27, 2019 at 10:51 PM
Subject: My sexual harassment incident with Vic Mignogna (Twitter reply - @kellyonelani)
To: <info@kawaiikon.com>

Hello,

Thank you very much for responding to my tweet about my incident with Vic. <https://twitter.com/KawaiiKon/status/1089598327681961984>

Here is the original tweet where I tell my story:
<https://twitter.com/kellyonelani/status/1086014744736149504>

A few days later, Vic put out a public "apology" response on his Twitter and has said that "all sexual harassment allegations are completely and utterly false" which is not true. I wasn't a fan of his, I was a complete stranger when he talked creepily to me, grabbed and held me in a tight embrace pushed up against his body, and then kissing my cheek. Before the last parts happened I remember being uncomfortable and just thinking, "Is something wrong with you? I'm here for my friend. I'm not a fan of yours." And since then he has been telling his fanbase (from his Discord server) to go out to defend him, a 56 year old man, and go after accusers. It has been pretty awful for me since then, to say the least.

If you haven't seen other people's stories, there is a hashtag on Twitter called #KickVic - you can find all sorts of first-hand accounts with Vic and it's not just sexual harassment accusations like mine, some are far far worse. These stories have been going on since 2005 (a good friend of mine has known this since the beginning, thankfully nothing has happened to her). I have industry friends too (English dub voice actors, con staff, a translator at Funimation, etc) who all know of Vic's bad reputation and sadly can't say anything publicly. He has also already been banned from a number of conventions over the years. This isn't just some new thing or because the new DBZ movie (that he voices in) just happened to coincidentally come out. Speaking of DBZ too, the voice of Goku (Sean Schemmel) also has been publicly "liking" a number of #KickVic tweets: <https://twitter.com/hanleia/status/1089041109819355137>

Here are some other details:

- This happened at Kawaii-Kon 2014, I was 27 years old (a lot of other people's incidents happened when they were minors)
- It was my first year tabling at your Artist Alley (and I've tabled every year since then, I won't be tabling at 2019 though since I'm trying to cut back on cons)
- I tabled under the artist name: "Onelani" (my full name is Kelly Onelani Loftus - I'm hapa-haole, btw)
- It happened on Day 1, and I was cosplaying Ren Mihashi from "Big Windup!" (the only time I ever wore that cosplay at your convention)
- I asked him to sign a box of chocolate macadamia nuts for my friend (she doesn't have the box anymore, but there's a good possibility she kept the original plastic wrap for it)



- I have two pictures, one before the kiss+embrace, and when he did it (I remember saving it on my old laptop but it has died since then, I could try to dig it up. I also still have my old iphone where it was taken on; I'm currently in Tokyo right now but I can try to reboot it after I return home and see if the picture is still on it)

If there's anything else I can do, please let me know. The reason why I came out with my story is because I saw the new wave of stories coming out and saw some people dismissing them, saying stuff like, "well you were a fan, so you wanted it" (a lot of the victims were minors at the time). I really felt it was important I finally said something because he has been getting away with everything for far too long, it really needs to stop. And I don't want someone else going through what I did.

Again, thank you very very much for responding to me and giving me this chance to email you and explain everything.

Mahalo,

Kelly (@kellyonelani)

EXHIBIT L

AFFIDAVIT OF MICHELE SPECHT

STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

Before me, the undersigned Notary Public, on this day personally appeared Michele Specht, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is Michele. I am of sound mind, competent and, authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I first met Victor Mignogna (“Mignogna”) in 2006 during the Anime Expo Convention in Los Angeles California. Mignogna was a celebrity guest on a panel. Following the panel, Mignogna approached me and asked if he knew me, and we then spent several hours together during that weekend. Following this encounter at the convention, we began a committed relationship that lasted twelve years.

3. I was Mignogna’s long-term girlfriend from 2006 – 2010, and then his fiancé from 2010 – 2018. In 2008, he moved from his home in Houston and moved in with me in Los Angeles, and we lived together for the next 10 years. In 2010, Mignogna proposed to me and we became engaged. Although we planned our wedding in 2014, it was ‘postponed’ 3 days beforehand, and we ultimately did not get married. I attended numerous conventions with Mignogna over the 12 years of our relationship and engagement. I am an actor and voice actor, and I also played a regular role in Mignogna’s project “Star Trek Continues” from 2013 - 2018. We ended our relationship/engagement in May of 2018.

4. Attached as Exhibit A to this affidavit is a true and correct copy of an email I sent to Mignogna on March 14, 2019. I sent this email to Mignogna’s email address,

victhewop@aol.com. I have used victhewop@aol.com to communicate with Mignogna for several years. I copied Lisa Hansell on this email.

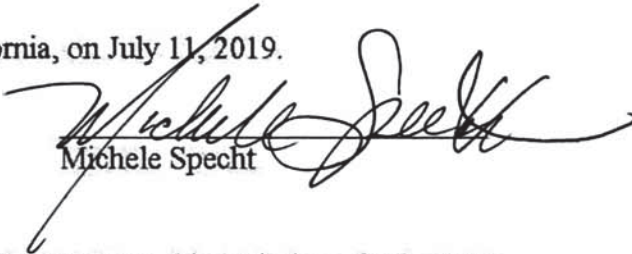
5. Attached as Exhibit B to this affidavit is a true and correct copy of an email I received from Mignogna on March 19, 2019. Mignogna used his email address victhewop@icloud.com. I have used victhewop@icloud.com to communicate with Mignogna since receiving this reply to my email.

6. Attached as Exhibit C to this affidavit is a true and correct copy of an email I sent to Mignogna on March 20, 2019.

7. Attached as Exhibit D to this affidavit is a true and correct copy of an email I received from Mignogna on March 22, 2019.

8. This concludes my affidavit testimony.

Executed in Los Angeles County, California, on July 11, 2019.


Michele Specht

SUBSCRIBED AND SWORN TO BEFORE ME on this 11th day of July 2019.

*see attached
certificate*

Notary Public, State of California

Printed Name

My Commission Expires: _____

CALIFORNIA JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA }

COUNTY OF Los Angeles }

Subscribed and sworn to (or affirmed) before me on this 13 day of July, 2019
Date Month Year

by Michele Specht

Name of Signers

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature: 
Signature of Notary Public



Seal
Place Notary Seal Above

----- **OPTIONAL** -----

Though this section is optional, completing this information can deter alteration of the document or fraudulent attachment of this form to an unintended document.

Description of Attached Document
Title or Type of Document: Affidavit of Michele Specht

Document Date: _____

Number of Pages: _____

Signer(s) Other Than Named Above: _____

EXHIBIT A

From: Michele Specht [REDACTED]
Subject: I think I understand
Date: March 14, 2019 at 12:46:01 AM PDT
To: Vic Mignogna <victhewop@aol.com>
Cc: Lisa Hansell [REDACTED]

I believe I understand now. During the entirety of our time together, you threw out fishing lines of 'interest' to other women whenever you saw an opportunity - looking for any indication of a positive response that you could make a move on... but you loved me, right? You had regular exchanges of intimate, romantic, and sexually explicit messages, pictures, even videos between yourself and countless women - strangers, acquaintances, fans, and 'friends' - even got blow jobs and more from a few whenever available... but you loved me, right? You paid for hookers at some out of town events you didn't already have 'companionship' scheduled - and utilized mutual 'friends' to research and book them for you... but you loved me, right? You systematically targeted dozens upon dozens of fangirls (most at least half your age) with whom you first built trust - some over long periods of time online, some in a manner of minutes in person - and made each one feel so very special and 'chosen' with the endless charm, attention, and mask of sincerity that abounds when you want something - seduced them, propositioned them, and turned them into convention fucks - doing so in every city and every country you went to - calling me afterward like you always did before you went to bed (sometimes with them still in the room)... but you loved me, right? You used your STC and con buddies as regular 'wingmen' at conventions to help arrange these hook-ups - fucking your way from one cosplayer to another - one group to the next - telling each one "I don't usually do this - there's just something about you" - convincing them you didn't need to use condoms because "they were the only one" or "don't worry - I'm taken care of" - after which you would come home and slip into our bed beside me as if nothing had happened... but you loved me, right? You started several serious second relationships - additional 'longterm girlfriends' the whole time we were living together and engaged - flew them out to spend the weekend with you at events, took them on romantic trips out of town, spent major holidays and birthdays with them when you were 'too busy working' to be with me or my family, created secret contact names on your phone to keep them hidden, carved time and energy out of our life to focus on them, built serious emotional relationships with them and told them how much you loved them everyday... but you loved me, right? You turned my concerns about flirtatious and overly 'intimate' interactions I myself witnessed, and that others told me they witnessed, into opportunities to be offended and affronted - to respond in anger and sometimes aggression - flipped the situations so I would seem delusional or even crazy - as if I was the one who couldn't let go or forget: "When will that shit be done with - when will it be over? When will I finally be forgiven?"... but... you loved me, right?

Every woman you are in any way attracted to becomes a 'source' - useful to you for one single purpose: to make you feel attractive/virile/significant/important/wanted/needed/special/famous

and less insecure in whatever capacity they are willing or able to provide it - without a single thought about the ramifications to them, me, or us when you were done with them. You've never wanted a partner - never wanted an equal, independent, free thinking person that you could mutually respect, support, or encourage in personal growth or the betterment of a symbiotic relationship - you want someone lower and 'lesser' - someone over whom you hold power and position - someone you can manipulate and control - someone whose sole purpose is to admire you - to agree with and affirm the limited and glossed over version of yourself you selectively present - someone who will only see what you want them to see - a 2-dimensional and filtered persona - all while you hide from, lie about, cover up, and literally ignore the person you actually choose to be every minute of every day by making every one of these choices over and over and over again.

And every time over the last year I thought I had a handle on the depth of shock, disbelief, and betrayal I experienced when learning about these things, I learn something new... and again prove above and beyond my incredible capacity to feel even MORE pain over loving you, standing by you, trusting you, and BELIEVING in you and in our life together for so long...

This is the truth. This is what happened. When surveyed in totality, it's impossible for a reasonable person to believe you've ever cared for, thought about, considered, prioritized, protected, or LOVED anyone other than yourself. Ever.

I spent the past year thinking the reconciliation of suffering and healing was mine to do alone - assuming all those participating in your hidden exploits did so consensually. But private wounds were cracked open by the public declarations of other women speaking up about the harassment or abuse you inflicted upon them. And since the few who came forward openly, so very many more have reached out privately - to me, and others close to us - all of them in tears, pain, and shame. Colleagues, cosplayers, fans (one of whom was underage at the time of her 'experience' with you), and most heartbreaking of all: members of our own STC family. That's member-S. Plural.

I say this with all seriousness: I am praying for you. I am praying for you BIG TIME. The pain you've caused others would never be enough to move you to self honesty or accountability - it would have to be pain you feel YOURSELF that might hit you deep enough to bring you to the point of surrender. I hope you're there. I hope you're finally willing to accept responsibility for being exactly where you are due to your choices, and your choices alone - to stop this useless effort of blaming others and desperately trying to 'save face' - and finally get down to the hard work of saving your ass, and your soul.

I hope this is it. For your sake, and the sake of everyone left in the wake of your wreckage, I truly do.

EXHIBIT B

From: victor mignogna <victhewop@icloud.com>

Subject: Dear Michele

Date: March 19, 2019 at 11:25:58 AM PDT

To: michele specht [REDACTED]

I am only now beginning to understand the depth of the pain I caused you, and the weight of it is nearly unbearable. I'm so ashamed and so deeply sorry. Those words don't even come close to sufficing. I'm working with a counselor and am fully committed to healing. There is so much I want to say, but I need to get further along in this process to have a clearer perspective.

I do hope you're praying for me vs. for my destruction.

EXHIBIT C

From: "michele [REDACTED]"
Date: March 20, 2019 at 12:09:55 AM PDT
To: victor mignogna <victhewop@icloud.com>
Subject: Re: Dear Michele

If I wanted your destruction, I wouldn't need to pray for it. I have had the opportunity, ammunition, and justification to do so - easily - for almost a year.

I didn't wait for the 'right' words from you in order to start healing - and working to try to come up with them shouldn't be the goal of yours. I could only surrender to my own pain and powerlessness, and examine the truth within my own mind and heart with humility and fearless honesty - as can you. It's the only real hope for all of us.

Sent from my iPhone

On Mar 19, 2019, at 11:25 AM, victor mignogna
<victhewop@icloud.com> wrote:

I am only now beginning to understand the depth of the pain I caused you, and the weight of it is nearly unbearable. I'm so ashamed and so deeply sorry. Those words don't even come close to sufficing. I'm working with a counselor and am fully committed to healing. There is so much I want to say, but I need to get further along in this process to have a clearer perspective.

I do hope you're praying for me vs. for my destruction.

EXHIBIT D

From: victor mignogna <victhewop@icloud.com>

Subject: Dear Michele

Date: March 22, 2019 at 2:27:10 PM PDT

To: michele specht [REDACTED]

I wasn't meaning to try to come up with the "right words". There are no right words. I was just meaning to say that no words that could suffice coming close to communicating my shame and remorse for the hurt I've caused you. My goal is to do whatever is necessary to get real healing and try to somehow make amends if possible.

EXHIBIT M

AFFIDAVIT OF JOHN PRAGER

STATE OF PENNSYLVANIA §
 §
COUNTY OF GREENE §

Before me, the undersigned Notary Public, on this day personally appeared John Prager, known to me to be the person whose name is endorsed hereto, and who, after being first duly sworn, stated under oath as follows:

1. My name is John Prager. I am over 18 years old, of sound mind, competent, and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. I have worked at numerous anime conventions since 2003. I was initially employed at Tekko Convention in Pittsburg, Pennsylvania in the security department in 2003. From 2004 to 2011, I was Head of Security and on the Board of Directors for the Tekko Convention. While accomplishing my duties and employment as the Head of Security and Board of Directors for the Tekko Convention, I was involved with several events concerning the voice actor Victor Mignogna (“Mignogna”).

3. In 2010, Mari Iijima—another celebrity guest and musician—was attending the Tekko convention along with Mignogna. Mignogna and Ms. Iijima were staying at the same hotel for the convention. Since I was head of security, I learned from other staff members that Mignogna was stalking Ms. Iijima and harassing her. Ms. Iijima notified Jim Gogal (CEO of Tekko at the time) that Mignogna had been stalking her and he was trying to get into her hotel room. Jim Gogal and I decided to move Ms. Iijima to a different hotel room so that Mignogna could not find her. I also ordered my security staff to keep a close eye on Mignogna during this convention.

4. After the Mari Iijima stalking incident, Mignogna was blacklisted and banned from Tekko until 2015, until the new Board of Directors invited him back. I voted for Mignogna to be banned from Tekko as a member of Tekko's Board of Directors in 2010.

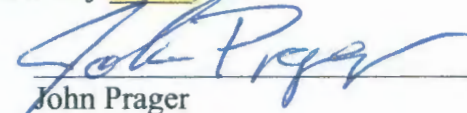
5. Based on my personal observations, personal interactions, and professional experience and training as a security officer, I believe Mignogna is a sexual predator. He does not pay attention to the age of anyone he talks to. If he is attracted to you, he will make it known aggressively. Further, I observed a lot of encroachment into other individual's personal space. For example, I notice Mignogna place a hand on the wall above a females' heads, touching females on the shoulders and the arms, and whispering in their ears. I observed this behavior repeatedly with women and teenagers.

6. I have observed Mignogna talked down to the staff and yell at the staff during the Tekko conventions. I observed him be dismissive to his guest handlers, and when Mignogna did not get his way, he would throw a huge fit. Mignogna was a pain in the ass to work with. I observed that staff who were not larger males would be treated in a rude manner by Mignogna.

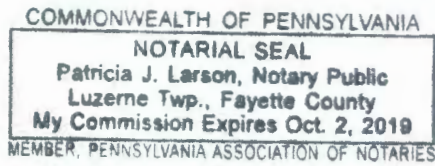
7. I have heard stories about Mignogna and his inappropriate conduct for a long time. I believe that this industry has known of his conduct for over twenty years. I have heard throughout the upper levels of the convention industry and the voice actor world that he has a bad reputation. I believe the higher-level staff and boards of various conventions have not been able to get enough direct evidence in order to deal with this in a proper way. I believe Mignogna has left a string of sexual assault victims across the country due to his celebrity status that allows him to have ample opportunities to be inappropriate. A lot of the smaller conventions put up with Mignogna, because they know his fans will show up and spend a lot of money. Even though I left Tekko in 2014, I believe Mignogna was blacklisted at the Tekko Convention again in 2018.

8. This concludes my affidavit testimony.

Executed in Greene County, Pennsylvania on July 17, 2019.


John Prager

SUBSCRIBED AND SWORN TO BEFORE ME on this 17th day of July 2019.




Notary Public, State of Pennsylvania

PATRICIA J. LARSON
Printed Name

My Commission Expires: 10/02/2019

EXHIBIT N

DEPOSITION OF MONICA RIAL

June 28, 2019

1	3
<p style="text-align: center;">NO. 141-307474-19</p> <p>VICTOR MIGNOGNA,) IN THE DISTRICT COURT)) Plaintiff,)) VS.) TARRANT COUNTY, TEXAS)) FUNIMATION PRODUCTIONS,) LLC, JAMIE MARCHI, MONICA) RIAL, and RONALD TOYE,)) Defendants.) 141st JUDICIAL DISTRICT</p> <p>----- ORAL AND VIDEOTAPED DEPOSITION OF MONICA RIAL JUNE 28, 2019 -----</p> <p>ORAL AND VIDEOTAPED DEPOSITION OF MONICA RIAL, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on June 28, 2019, from 8:50 a.m. to 12:29 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto.</p> <p>Job No. 132315</p>	<p style="text-align: center;">INDEX</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>Appearances..... 2</p> <p>MONICA RIAL</p> <p>EXAMINATION BY MS. CHRISTIE..... 5</p> <p>Signature and Changes..... 82</p> <p>Reporter's Certificate..... 84</p> <p style="text-align: center;">EXHIBITS</p> <p>Exhibit 2 Previously marked-news article from Polygon..... 67</p> <p>Exhibit 4 Previously marked-Article from Anime News Network..... 68</p> <p>Exhibit 5 Previously marked-Fixing the Staircase Article..... 69</p> <p>Exhibit 8 Previously marked-Article on Gizmodo... 69</p> <p>Exhibit 29 Monica Rial Tweet from 12/17/18..... 41</p> <p>Exhibit 30 Tweet from Funimation..... 45</p> <p>Exhibit 31 Tweet from Monica Rial 2/11/19 at 8:09 p.m..... 49</p> <p>Exhibit 32 Tweet from Monica Rial 2/19/19 at 6:48 a.m. 50</p> <p>Exhibit 33 Tweet from Monica Rial 2/19/19 at 5:15 p.m..... 52</p> <p>Exhibit 34 Tweet from Monica Rial 2/19/19 at 9:43 p.m..... 61</p> <p style="text-align: center;">REQUESTED DOCUMENTS/INFORMATION</p> <p>NO. DESCRIPTION PAGE</p> <p>NONE</p> <p style="text-align: center;">CERTIFIED QUESTIONS</p> <p>NO. PAGE/LINE</p> <p>NONE</p> <p>*XXXX identifies redacted names in the transcript per confidentiality stipulation</p>
2	4
<p style="text-align: center;">A P P E A R A N C E S</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>FOR THE PLAINTIFF: Ms. Carey-Elisa Christie, Esq. Mr. Ty Beard, Esq. BEARD HARRIS BULLOCK HUGHES, PC 100 Independence Place Suite 101 Tyler, Texas 75703 (903) 509-4900 ty@beardandharris.com carey@beardandharris.com</p> <p>FOR THE DEFENDANTS RONALD TOYE and MONICA RIAL: Mr. Casey S. Erick, Esq. COWLES & THOMPSON 901 Main Street Suite 3900 Dallas, Texas 75202 (214) 672-2000 cerick@cowlesthompson.com</p> <p>FOR THE DEFENDANT FUNIMATION PRODUCTIONS: Mr. John Volney, Esq. LYNN PINKER COX & HURST, LLP 2100 Ross Avenue Suite 2700 Dallas, Texas 75201 (214) 981-3839 jvolney@lynnllp.com</p> <p>FOR THE DEFENDANT JAMIE MARCHI: Mr. Sam Johnson, Esq. JOHNSON SPARKS 7161 Bishop Road Suite 220 Plano, Texas 75024 (972) 918-5274 sam@johnsonsparks.com</p> <p>FOR THE VIDEOGRAPHER: Mr. John Franks</p> <p>ALSO PRESENT: Mr. Ronald Toye</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>THE VIDEOGRAPHER: And we're going on the record in the videotaped deposition of Monica Rial. Today's date is June 28, 2019. The time is approximately 8:50 a.m.</p> <p>At this time will counsel please state their appearances for the record and then the court reporter will swear in the witness.</p> <p>MS. CHRISTIE: Carey Christie for the Plaintiff Victor Mignogna.</p> <p>MR. BEARD: Ty Beard for the Plaintiff Vic Mignogna.</p> <p>MR. ERICK: Casey Erick for Defendants Monica Rial and Ron Toye.</p> <p>MR. JOHNSON: Sam Johnson for Defendant Jamie Marchi.</p> <p>MR. VOLNEY: John Volney for Funimation.</p> <p>MS. CHRISTIE: And, gentlemen, are you going to do the same as yesterday with the one-person objections?</p> <p>MR. ERICK: Yes.</p> <p>MS. CHRISTIE: And then the confidentiality that we had?</p> <p>MR. ERICK: Correct.</p> <p>MR. JOHNSON: Yes.</p> <p>MR. VOLNEY: Yes.</p>

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<p>1 MS. CHRISTIE: Thank you. 2 (Oath administered.) 3 THE REPORTER: This will be taken under the 4 Texas Rules of Civil Procedure? 5 MS. CHRISTIE: Yes. 6 And, Casey, would you like to have her read 7 and sign? 8 MR. ERICK: Yes, I would. Thank you. 9 MONICA RIAL, 10 having been first duly sworn, testified as follows: 11 DIRECT EXAMINATION 12 BY MS. CHRISTIE: 13 Q. Hello. How are you today? 14 A. Good. How are you? 15 Q. I'm Carey Christie. I'm one of Vic Mignogna's 16 attorneys. Sorry. I have a hard time with his last 17 name. 18 A. A lot of people do. 19 Q. So is it okay if I just say Vic throughout 20 because -- 21 A. That's fine. 22 Q. Okay. 23 A. I get it. 24 Q. And -- and what would you like me -- how would 25 you like me to address you? Can we say Monica or --</p>	<p>6 Q. Okay. Can you please state your full name for 7 the record. 8 A. It is Monica Jean Rial. 9 I hate my middle name.</p>
6	8
<p>1 A. Oh, sure. 2 Q. -- Ms. Rial? 3 A. Sorry. I keep stepping over. 4 Uh, Monica is fine.</p>	

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<p>9</p>	<p>11</p>
<p>11 Q. And what is your current employment?</p> <p>12 A. I am currently a voice actress for commercial</p> <p>13 anime and video games.</p> <p>14 Q. Do you have contracts with any studios</p> <p>15 currently?</p> <p>16 A. Well, Funimation does yearly contracts.</p> <p>17 Sentai, another studio I work for, does contract by the</p> <p>18 project. So for that studio, no; for Funimation, yes,</p> <p>19 I'm under their yearly contract.</p> <p>20 Q. And how long have you been a voice actress?</p> <p>21 A. For 20 years.</p> <p>22 Q. And how are you typically paid for this type of</p> <p>23 work?</p> <p>24 A. Well, it's contract work, so I'm paid by the</p> <p>25 contract. It's usually 1099. Yeah. And it depends,</p>	
<p>10</p>	<p>12</p>
<p>1 sometimes it goes through my agency and sometimes it</p> <p>2 comes directly to me, dependent upon where I'm working.</p>	
	<p>20 Q. And have you -- do you recall discussing the</p> <p>21 Funimation investigation on Twitter?</p> <p>22 A. I recall mentioning it after they made their</p> <p>23 announcement that there was an investigation.</p>

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<p>1 THE WITNESS: I'm snotty.</p> <p>2 Q. (BY MS. CHRISTIE) And was that when you</p> <p>3 commented on the -- I believe the post was on either</p> <p>4 February 10th or 11th of this year that -- was there --</p> <p>5 did you comment when they post -- when Funimation</p> <p>6 posted; do you recall that?</p> <p>7 A. Oh, yeah. I believe -- I didn't realize at the</p> <p>8 time, I don't think, that I was replying to that</p> <p>9 comment, cuz Twitter, the way it comes at you, it's hard</p> <p>10 to tell.</p>	
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<p style="text-align: right;">21</p>	<p style="text-align: right;">23</p>
<p>10 Q. And do you -- I believe I understand that -- 11 that you and Ron are engaged? 12 A. Yes, ma'am. 13 Q. Is that correct? 14 And how long have you been dating? 15 A. Five years in -- next weekend. Sorry. I 16 totally forgot. 17 Q. How long have you been engaged? 18 A. We've been engaged, I believe it's been two 19 years. I believe it's been two years, yes. Sorry. 20 It's hard to remember. 21 Q. And do the two of you live together? 22 A. Yes, ma'am.</p>	<p>21 Q. (BY MS. CHRISTIE) Monica, you had mentioned 22 earlier that you have a contract with Funimation that's 23 running through the year. 24 A. Yes, ma'am. 25 Q. Okay. And you are a voice actress for them on 1 a contractual basis? 2 A. Yes, ma'am.</p>

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<p>25</p>	<p>27</p>
	<p>6 Q. Can you recall who you have spoken with at 7 Funimation, that are employees of Funimation, about Vic? 8 A. About this particular -- 9 Q. (Attorney nods.) 10 MR. VOLNEY: Objection, form. 11 A. Who have I spoken to? I know I've spoken to 12 Colleen. I know I've spoken to Trina. I have spoken to 13 Lisa Gibson. I've spoken to Karen Mika and Justin Cook. 14 Q. (BY MS. CHRISTIE) Did you also speak with a 15 person named Tammi Denbow from Sony? 16 A. Yes. 17 Q. Can you recall the approximate time range, date 18 range, when you were discussing Vic with these people at 19 Funimation? 20 A. Well, with Tammy, it was earlier on, I don't 21 recall exactly, but it was earlier on as part of their 22 investigation. The others I spoke to much later on, 23 because it was as a result of the harassment that I was 24 receiving online. 25 Q. And by early on in the investigation, was --</p>
<p>26</p>	<p>28</p>
<p>6 Q. How long have you been doing work for 7 Funimation? 8 A. I started working with Funimation in 2003. 9 Q. And who is Lisa Gibson? 10 A. Lisa Gibson is -- forgive me. I'm not even 11 sure what her title is now, but she works at Funimation. 12 Q. Who is Colleen Clinkenbeard? 13 A. Colleen Clinkenbeard is a voice actress 14 director, and she is currently, I believe, in charge of 15 video extras at Funimation.</p>	<p>1 was that around the January 15th, 16th time frame? 2 A. I know it was sometime in January, but I don't 3 remember exact dates at all. Sorry. 4 Q. And prior to January of 2019, had you spoken to 5 anyone at Funimation about Vic? 6 A. About Vic in particular, about anything about 7 Vic, or I -- 8 Q. Or just about -- about these allegations that 9 have been made. 10 A. No. 11 Q. Did you -- were you under that yearly contract 12 with Funimation in January of this year? 13 A. Yes. 14 Q. You have -- you have mentioned the 15 investigation in some of my previous questions. 16 Who from Funimation contacted you? 17 A. From Funimation? 18 Q. Yes. 19 A. Nobody -- it depends on if you're considering 20 Tammi Denbow being Sony, a part of Funimation, then 21 Tammi. 22 Excuse me. 23 Q. Did she just contact you out of the blue? 24 A. No. I had contacted Colleen Clinkenbeard and 25 said that I needed to talk to her, or talk to someone,</p>

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1 and she gave me -- she said she would pass the
2 information along. And then that's when Tammi reached
3 out to me.
4 Q. When you had communication with Tammi was it --
5 was it mostly email or did you also speak on the phone?
6 A. It was mostly on the phone.
7 Q. Did you exchange emails with Tammi Denbow?
8 A. Yes, ma'am.
9 Q. Have you provided those to your attorney?
10 A. Yes, ma'am.
11 Q. And when you had discussions with Tammi Denbow
12 about Vic, did you relate your -- your story to her?
13 A. Yes, ma'am.
14 Q. Can you recall the specifics of what you
15 related to her about yourself?
16 A. Well, I related to her that I went to a
17 convention called Izumicon in 2007, that Vic and I were
18 both guests there, that we -- the whole weekend I had
19 spent flirting with a gentleman named Rawly Pickens, and
20 Vic would come and join us on occasion and kind of
21 didn't get the -- didn't seem to realize that we were
22 doing our little flirting thing. And Sunday, when they
23 all left, Stan Dahlin, the convention chair, had said,
24 you know, we're going to all go out to dinner with the
25 staff and we'd like for you guys to go, and we agreed.

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1 And then Vic said, Hey, can you come by my hotel room?
2 There's something I want to show you. And I can't
3 recall exact -- I think it was the Full Metal Fantasy
4 film that he had done, his fan film.
5 And so I went to his hotel room, because,
6 like I said, I had been flirting with Rawly all weekend
7 and he was dating a friend of mine named Michele Specht.
8 So I went with him to the hotel room. He played for me,
9 the video, and in the middle of the video he grabbed me
10 by the arms and he turned me around and he started
11 kissing me. And -- sorry. And I was --
12 Q. It's okay.
13 A. -- I was raped when I was 15 years old, and so
14 for me it was -- it was a very difficult moment. I was
15 frightened. I was scared. I didn't know what to do.
16 When I was 15, I had fought back, and that
17 didn't end well for me. So I just kind of went along
18 with it, knowing that Stan -- any minute Stan was going
19 to come to the door. And he kept kissing me and kind of
20 pushed me back onto the bed and actually got on top of
21 me, and I still have like a very visual -- like a
22 nightmare, actually, that -- that feeling of looking at
23 the door and thinking how do I get out of this, like,
24 how -- how do I -- how do I get out of there without
25 ruining the friendship that we'd had, the trust that we

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1 had built, and then Stan came to the door. And when
2 Stan came to the door, he jumped up and ran to the door,
3 and I kind of covered my face. Because being pale,
4 if -- if anything is happening, you can see it all over
5 my face.
6 Stan came in. He asked me, as we were
7 leaving, you know, Are you okay? I said Oh, yeah, yeah,
8 I'm fine, and just kind of kept covering my face.
9 And we went to dinner. I don't recall
10 where we went or what was spoken about, because I think
11 I was in shock the whole time. And when we came back,
12 he went out -- outside of his room there was this little
13 patio, and he was standing on the patio and he called
14 Michele. And he -- he put me on the phone with Michele,
15 and that was hard for me, because she was a friend of
16 mine. And I remember that being the moment I talked to
17 Michele, I said good night, and then I went to my room
18 and -- and that was it.
19 Q. I know this is hard for you.
20 A. It's gotten easier, the more you have to tell
21 it, but it still sucks, it still sucks big time.
22 Q. So you related that story to Tammi Denbow?
23 A. Yes, ma'am.
24 Q. Okay. And what -- was there some mention of a
25 -- of a jelly bean incident?

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6 Q. Did you tell anyone about the jelly bean
7 incident prior to January of 2019?

8 A. I know that Greg and I had spoken about it once
9 before, just going, Oh, you remember that weird thing
10 that happened? But, no, I did not -- that was not
11 something that I made common knowledge.

12 Q. Why did you bring it up now?

13 MR. ERICK: Objection, form.

14 A. Because she had asked for examples of sexual
15 harassment. Sorry. Tammi had asked for examples.

16 MS. CHRISTIE: Okay. And this is a portion
17 where there's going to be some confidentiality.

10 Q. And I believe I've looked at a tweet, which
11 we'll get into a little bit later, that -- that -- that
12 had your Twitter handle, that indicated there were
13 dozens of people that came forward. Is that an accurate
14 statement?

15 MR. ERICK: Objection, form.

16 A. Over the years, I can't -- without looking at
17 the tweet, I don't know exactly what I was referring to,
18 but there have been more than just the one investigation
19 by Funimation over the years, there's been quite a few.

20 Q. (BY MS. CHRISTIE) Do you know who did those
21 investigations?

22 A. Not off the top of my head. There was one done
23 by ADV Films back in the early 2000s, that was kind of a
24 general sweeping sexual harassment investigation that I
25 know that he was a part of. I don't know if they ever

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<p style="text-align: right;">37</p> <p>1 dealt with him or anything like that, but I know that he 2 was investigated then. 3 Q. Was that the only one? 4 A. I know, of course, about Rooster Teeth; I don't 5 know the specifics of that. I know Sentai, and I know a 6 few conventions have kind of done their own 7 investigations on him. 8 Q. Okay. Can you recall which conventions or -- 9 A. No. I wouldn't have that information. I don't 10 know off the top of my head. 11 Q. But up until January of this year, no one had 12 taken any actions, that you're aware of, with regard to 13 Vic? 14 MR. ERICK: Objection, form. 15 A. Well, I know that he's not allowed on the 16 property at Sentai Filmworks. 17 Q. (BY MS. CHRISTIE) How do you spell that? 18 A. It's S-E-N-T-A-I, and then Filmworks is all one 19 word. 20 Sorry, you guys, just whenever I throw out 21 a Japanese name, let me know and I'll clarify. 22 Q. And with regard to the other investigation that 23 you heard secondhand, that -- from Tara Jayne Sands that 24 had been done, did you participate in any way in that 25 investigation?</p>	<p style="text-align: right;">39</p>
<p style="text-align: right;">38</p> <p>1 A. No, ma'am. 2 Q. Do you know if Vic participated? 3 A. I don't know. 11 Q. And prior to 2019, were there a lot of rumors 12 about Vic? 13 A. Yes, ma'am.</p>	<p style="text-align: right;">40</p>

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<p>41</p>	<p>43</p> <p>1 a good friend?</p> <p>2 A. When he assaulted me.</p> <p>3 Q. That would have been in 2007?</p> <p>4 A. '07, uh-huh. November, I believe. I can't</p> <p>5 recall.</p> <p>6 Q. And -- and in your opinion, just your opinion,</p> <p>7 what would you define a friend to be?</p> <p>8 A. A friend is someone who you can trust</p> <p>9 inherently, and that you enjoy spending time with, and</p> <p>10 dependent on the -- the -- the -- the amount of</p> <p>11 friendship, can be almost like a family member.</p> <p>12 Q. And prior to 2007, do you consider Vic to be</p> <p>13 like a family member?</p> <p>14 A. Not like a family member.</p> <p>15 Q. Okay.</p> <p>16 A. Not that close.</p>
<p>25</p>	<p>When did you decide that Vic was no longer</p>

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16 Q. Okay. Were you and Vic representing Funimation
17 when he allegedly assaulted you in 2007?
18 MR. ERICK: Objection, form.
19 A. We work as independent contractors for
20 Funimation, but we do not represent Funimation, other
21 than being a voice actor.

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	<p>1 6:48 a.m., did you tweet -- and I'm taking this out of 2 context a little bit -- of, "I've spoken up for years." 3 A. Uh-huh. 4 Q. To whom had you spoken up to? 5 A. I spoke to Vic directly. I sent him two emails 6 in the early 2000s about his behavior and how he was 7 burning bridges and -- and -- and people were not 8 looking at him favorably. And I mentioned it to ADV 9 Films back in the day. 10 Q. Okay. 11 A. Other than that, I can't recall who I've spoken 12 to about it. 13 Q. Okay. Besides Tammi Denbow, in January of this 14 year, who else had you spoken to about the -- the 15 alleged assault in 2007? 16 A. I was so shaken, the only person that I know 17 knew about it early on was Rawly Pickens, who was my -- 18 my boyfriend of five years after that convention. 19 Q. Did you ever observe Rawly confront Vic about 20 that? 21 A. No, ma'am. 22 Q. Was Vic confronted about it at that time? 23 A. No, ma'am. 24 Q. You had not told Ron until January of this 25 year?</p>
16 (Exhibit 32 marked.) 17 Q. (BY MS. CHRISTIE) I'll mark this as 18 Exhibit 32. Oh, wait. Sorry. Okay. I'm handing you 19 what I've marked as Exhibit 32. Does that appear to be 20 a tweet with your name? 21 A. Yes, ma'am. 22 Q. Okay. And would you say this is your tweet? 23 A. I believe it is. I don't recall making it, but 24 it is my Twitter handle. 25 Q. Okay. In this tweet on February 19, 2019, at	52
	<p>1 A. I chose not to tell Ron -- we speak about 2 everything, but that incident rattled me so badly, along 3 with the incident when I was 15 years old, that my way 4 of coping for a very long time was just to put it in the 5 back of my mind and not even discuss it. So, no, I did 6 not tell him until January.</p>

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18 Q. And I have a question for you, and I hope this
19 does not seem to be insensitive, but why did you wait
20 for 11, 12 years, before telling this story to anyone?

21 MR. ERICK: Objection, form.

22 A. I -- like I said, dealing with the emotional
23 turmoil, I compartmentalized it -- I think that's the
24 term the therapist uses -- compartmentalized it, pushed
25 it away, so that it wasn't in the forefront of my brain.

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25 Q. (BY MS. CHRISTIE) And you had indicated you

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1 had sent Vic a couple of emails in the early 2000s. How
2 many times did you try to address Vic's behavior with
3 him?
4 A. It was more than just emails. We spoke in
5 person. There were several accounts where he made
6 handlers cry, yelled at staff, and so I was usually
7 the -- they joked and called me the Vic Whisperer. So I
8 would go and calm him down and try to deal with the
9 situation.
10 Q. And this question may seem odd, but you
11 understand that just because you're a jerk, it doesn't
12 mean that you're a predator, a pedophile, or a sexual
13 assaulter? Do you understand -- do you understand that?
14 MR. ERICK: Objection, form.
15 A. I understand that people can be jerks,
16 regardless.
17 Q. (BY MS. CHRISTIE) And how many times are you
18 alleging that Vic would take a fist full of your hair
19 and whisper in your ear?
20 A. Oh, I can't even count how many times that's
21 happened.
22 Q. Was it every time you saw him?
23 A. Not every time, but it was almost -- almost
24 every time, depending on who was around us.
25 Q. And how many years since you've known Vic,

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18 Q. (BY MS. CHRISTIE) And would Vic grab your hair
19 when it was short?
20 A. I -- I can't recall. I can't recall. I know
21 that he saw me recently, and instead of grabbing my
22 hair, he grabbed my neck, the back of my neck.
23 Q. When was recently?
24 A. Whenever we did the Broly press stuff,
25 December.

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1 Q. Do you consider yourself to be a strong,
2 confident woman?
3 MR. ERICK: Objection, form.
4 A. Yes, ma'am.
5 Q. (BY MS. CHRISTIE) Do you consider yourself to
6 be weak?
7 MR. ERICK: Objection, form.
8 A. With certain things, of course. I think we all
9 have our weaknesses.
21 Q. (BY MS. CHRISTIE) And did you ever use
22 physical force to push Vic away from you?
23 A. Yes, ma'am.
24 Q. Did you ever tell him, Dude, don't grab my
25 hair, don't whisper in my ear?

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1 A. Yes, ma'am.
2 MR. ERICK: Objection, form.
3 THE WITNESS: Sorry.
4 A. Yes, ma'am.
5 MR. ERICK: Just a half second more --
6 THE WITNESS: Sorry.
7 MR. ERICK: -- would be good.
8 Q. (BY MS. CHRISTIE) And maybe not dude, but Vic?
9 A. Yeah.
10 MR. ERICK: Same.
11 Q. (BY MS. CHRISTIE) Okay. Do you recall when
12 you told him to stop?
13 A. There were quite a few times. I can't remember
14 them all.
25 Q. (BY MS. CHRISTIE) Okay. I'm sorry to keep

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1 going over the situation in 2007, but I'm going to hand
2 you what I've marked as Exhibit 34.
3 (Exhibit 34 marked.)
4 Q. (BY MS. CHRISTIE) And what does this appear to
5 be?
6 A. It appears to be one of my tweets.
7 Q. And what is the date on that?
8 A. February 19, 2019.
9 Q. And is there a timestamp on that?
10 A. 9:43 p.m.
11 Q. Okay. And in this tweet you are briefly
12 discussing, or it appears that you're briefly
13 discussing, the alleged incident that happened in 2007;
14 is that true?
15 A. Yes. Sorry.
16 Q. Okay.
17 A. I'm still reading it.
18 Q. Okay. Okay. Sorry.
19 A. No, that's okay.
20 Q. Need to give you time.
21 A. Okay.
22 Q. Okay. And in this tweet where you say I went
23 to a friend's room and he grabbed me by my upper arms
24 and french kissed me, there's no mention of him pushing
25 you to the bed, correct?

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1 A. No. I think I saved --
2 Q. Okay.
3 A. I didn't post details at that time.
4 Q. Okay. And there's no mention of Stan -- Stan
5 knocking on the door?
6 A. No. Because --
7 Q. Okay.
8 A. -- like I said, I didn't post the details at
9 that time.
10 Q. Okay. All right. And I'm going to switch
11 gears just a little bit, because I missed some questions
12 in my outline.
13 There have been -- I have seen some
14 comments through several Twitter tweets that Vic was
15 considered powerful.
16 A. Oh, yes. In the industry?
17 Q. Yes.
18 A. Yes, considerably.
19 Q. And have -- have any of the voice actors been
20 fired from a project at his request, that you are aware
21 of?
22 A. Not that I know of.
23 Q. Okay. And this is just my observation, but, to
24 me, I would think that someone having more roles would
25 be more powerful in an industry.

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1 A. That's not necessarily the case. There are a
2 lot of people who have a lot of roles, who don't speak
3 up, who don't -- you know, it just depends on the
4 situation.
5 Q. Okay. And what -- what -- what did you see
6 that you felt made Vic powerful?
7 A. Well, he has a presence in the community, he
8 was always wheeling and dealing and trying to find new
9 connections, and so he did have a lot of connections in
10 the industry. He -- the -- the studio saw him as
11 somebody who they could attach his name to a project and
12 it would make more money.
13 For example, there's a show called Tsubasa
14 Reservoir Chronicles, and I'm one of the leads. And my
15 name does not appear on the box, but Vic Mignogna's name
16 does, even though I'm the lead character.
17 Q. Okay. And do you know of anyone who has tried
18 to get Vic fired from any jobs?
19 A. No, ma'am.
20 Q. And have you -- do you know anyone that has
21 said to you, Monica, I -- Vic needs to be replaced in
22 this role?
23 A. No, ma'am.
24 Q. Okay. And earlier, you had -- you had
25 mentioned Michele Specht.

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1 Prior to the Ichi -- Ichibancon
2 (phonetic) --
3 A. Oh, Izumicon?
4 Q. Izumicon. Okay. Sorry. Wrong one.
5 A. That's okay.
6 Q. The Izumicon in 2007, how many times had you
7 been around her?
8 A. I don't know the number of times. I know that
9 we were friends, but I don't know exactly how many times
10 I've seen her.
11 Q. How often did you communicate with her, prior
12 to this incident in 2007?
13 A. I don't know.
14 Q. Okay. And I believe you -- she's been
15 described as a close friend, so describe what about your
16 relationship made her a close friend.
17 A. I wouldn't say she was close, like, she wasn't
18 a best friend or anything, she was a lot of fun. So
19 whenever we were at conventions together, we would make
20 a point to get together and, you know, go to dinner or
21 do something all together. So I would say she was a
22 close convention friend, if that makes sense.
23 Q. Uh-huh. Yes. And I believe you said this
24 earlier, but if you had distanced yourself from Vic, why
25 would you have sent the kissy face emoji?

DEPOSITION OF MONICA RIAL
June 28, 2019

65

1 A. Because it's my job to put up appearances and
2 make it appear as though everything is great, but, also,
3 like I said in my statement, I made every effort to try
4 and move past that event, thinking it was a one-time
5 thing with me alone, and I wanted to forgive him. I
6 wanted to believe that he was a better person than that.
7 Q. Could you just have said, I had fun?
8 MR. ERICK: Objection, form.
9 A. Yes. But if you look at my Twitter you'll see
10 that I use emojis all the time, so it would have been
11 out of character for me not to use an emoji. I use
12 hearts constantly.
13 Q. (BY MS. CHRISTIE) And on this evening in 2007,
14 I know that's been many years ago so the details might
15 be fuzzy, or you might have kind of compartmentalized
16 some stuff, but you -- you and Vic had planned to go to
17 dinner with Stan?
18 A. Yes. It was what they call a dead dog, which
19 is a little get-together they do after the convention to
20 kind of wrap everything up with the staffers and --
21 Q. Okay.
22 A. -- everyone.
23 Q. Okay. And -- and had -- had Stan given you a
24 time when you were going to go to dinner?
25 A. I don't recall whether he gave us a specific

66

1 time. I know he did say, I'll go by the room and get
2 you when we're on our way.
3 Q. And how long were you in Vic's room?
4 A. Oh, I don't -- I don't know.
5 Q. And how did Stan know to knock on the door of
6 Vic's room and not yours?
7 A. Because we had said -- he -- he had asked me --
8 Vic had asked me to come to his room to see the video in
9 front of Stan.
10 Q. Okay. And I'm going to be asking you a couple
11 of questions, please know that I'm not --
12 A. I understand.
13 Q. -- trying to -- to discredit or discount or --
14 your -- what you have told us. But if -- if Vic knew
15 Stan was coming to get you, why -- why would Vic -- I
16 mean, to your knowledge, why would Vic have initiated
17 anything?
18 A. I don't know.
19 MR. ERICK: Objection, form.
20 A. I don't know. I can't answer that for him.
21 Q. (BY MS. CHRISTIE) And couldn't Stan have come
22 to the door at any moment?
23 A. I don't know.
24 Q. But it's possible? I mean, he could have come
25 at any moment?

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1 A. I have no idea what Stan's plans were that day.
2 (Exhibit 2 previously marked.)
3 Q. (BY MS. CHRISTIE) And -- okay. So during the
4 depositions the past two days, there have been some
5 articles that we have mentioned. And I'm going to hand
6 you what was Exhibit 2. Okay. This appears to be -- or
7 could you tell us what this appears -- Exhibit 2 appears
8 to be.
9 A. It appears to be -- excuse me -- an article on
10 Polygon.
11 Q. Okay. And do you know what Polygon is?
12 A. I would assume it is a news site.
13 Q. Okay. And were you contacted by Polygon?
14 A. I was contacted by Polygon when Vic filed the
15 lawsuit, and they were asked -- I was asked to comment
16 on it.
17 Q. Were you con -- were you contacted by them to
18 comment for this article?
19 A. No, ma'am.
20 Q. Okay. And how did they contact you when the
21 suit was filed?
22 A. Through my talent agent.
23 Q. Okay. And then I'm going to hand you what --
24 A. Do you want to put an exhibit --
25 Q. Yes, I'll take that back.

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1 (Exhibit 4 previously marked.)
2 Q. (BY MS. CHRISTIE) I'll hand you what was
3 marked as Exhibit 4 earlier. And what does this appear
4 to be?
5 A. It appears to be an article on Anime News
6 Network.
7 Q. Okay.
8 A. Or I can't tell if that's the News Network or
9 if that's just a banner at the top.
10 Oh, it is. Anime News Network. Sorry.
11 Q. Okay. Okay. And what is anime News Network?
12 A. It is a news site about anime.
13 Q. Okay.
14 A. Sorry.
15 Q. That makes sense.
16 A. Sorry.
17 Q. That makes sense.
18 And does this appear to be an article
19 regarding Vic?
20 A. Yes, ma'am.
21 Q. Okay. Were you contacted by Anime News Network
22 to comment for this article?
23 A. No, ma'am.
24 Q. Have you been contacted by Anime News Network
25 since this article was --

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June 28, 2019

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1 A. Not that I know of. I mean, Twitter handles,
2 it's impossible to tell who is talking to you.

3 Q. Okay.

4 A. So as far as I know, no.
5 (Exhibit 5 marked.)

6 Q. (BY MS. CHRISTIE) Okay. Just change -- we'll
7 just exchange.

8 And then I've handed you what is marked as
9 exhibit -- or what has been marked as Exhibit 5. And
10 what does that appear to be?

11 A. I honestly am not sure which -- is it one of
12 these? I'm not -- it's either a blog, book, Manga, or
13 about.

14 Q. Okay. What does it -- what does the title say?

15 A. It says, "Fixing the Staircase: Vic Mignogna's
16 Sexual Assault Allegations and the Voice Actors Who
17 Speak Out."

18 Q. Okay. Did you provide any information for this
19 article?

20 A. Not that I'm aware of, no.
21 (Exhibit 8 previously marked.)

22 Q. (BY MS. CHRISTIE) Okay. Articles, articles.
23 Okay. And then I'm handing you what has been previously
24 marked as Exhibit 8. And what does this appear to be?

25 A. It appears to be a -- an article on Gizmodo.

71

1 and hard before I agreed to it, but --

70

1 Q. Okay. And --

2 A. But this looks like a tweet, so I'm not -- I'm
3 confused.

4 Q. I think it might be part of the article.

5 A. Oh, is it just the picture? Okay.

6 Q. Yes, ma'am.

7 Did you provide any comments for this
8 article?

9 A. Yes, ma'am.

10 Q. Okay. And are you Charlotte in this article?

11 A. I wouldn't know. I asked for Beth to choose a
12 pseudonym so it wouldn't be under my name.

13 Q. Okay. And so you spoke with Beth Elderkin?

14 A. Yes, ma'am.

15 Q. And how did you speak to her?

16 A. On the phone.

17 Q. Okay. Did you ever communicate with her
18 through email or text?

19 A. No, ma'am.

20 Q. Okay. And why did you choose to participate in
21 this article as opposed to any other places?

22 MR. ERICK: Objection, form.

23 A. This particular article, I'm not sure,
24 honestly. I wasn't reached -- I think they were one of
25 the few that reached out, and I thought about it long

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June 28, 2019

<p>73</p>	<p>75</p>
	<p>1 A. With the investigation, I came forward because, 2 as I said earlier, let me know 3 needed to talk to me about something. And emailed 4 me statement and I read it. And when I read it, I 5 noticed that there were details that were so incredibly 6 similar to what had happened to me, that it started to 7 make me wonder if maybe the one-time thing wasn't a 8 one-time thing, and maybe I had forgiven him, not 9 realizing that there was more to the story. 10 And so then with that, coupled with 11 then telling me the same thing, which, again, was along 12 the same lines of what had happened to me, then I 13 decided that I should probably speak up, if, for nothing 14 else, because of the statute of limitations passing, at 15 least it would corroborate the other stories so that 16 they would know that they weren't the only ones. 17 Q. (BY MS. CHRISTIE) Do you believe that Vic 18 should lose a 20-year career? 19 MR. ERICK: Objection, form. 20 A. I believe that actors deserve a safe work 21 environment, and if that has to be the outcome, then, 22 yes. 23 It's not on the microphone. Sorry. I just 24 had a dribble. It's not on the microphone, so we're 25 okay.</p>
<p>74</p>	<p>76</p>
<p>23 Q. (BY MS. CHRISTIE) On Twitter, or with the 24 investigation with Funimation. 25 MR. ERICK: Objection, form.</p>	<p>1 Q. And what do you consider to be a safe work 2 environment? 3 A. A safe work environment, to me, would mean 4 being able to come to work and everyone is professional, 5 there's no kind of weird harassment, there's no kind of 6 anxiety. Basically, making sure that it is a fun work 7 environment, that nobody has to worry about anything 8 that's going to make them uncomfortable or unhappy. 9 Q. Okay. And what, in your personal opinion, 10 would it take for Vic to be able to come back to work? 11 MR. ERICK: Objection, form. 12 A. I believe I stated it in one of my Twitter 13 statements or I know I've said it on Twitter repeatedly, 14 that I have said that if he would apologize and he would 15 seek counseling and seek help, that, at that point, then 16 I feel like maybe he -- they would consider -- and lay 17 low for a while, that maybe in the future he would have 18 a path to redemption.</p>

DEPOSITION OF MONICA RIAL
June 28, 2019

<p>77</p>	<p>79</p>
	<p>1 A. Yes, ma'am.</p> <p>2 Q. And who would those be?</p> <p>3 A. Chris Slatosch.</p> <p>4 Q. Okay. Is he the only one?</p> <p>5 A. Yes.</p> <p>6 Q. And have you -- have there been any other --</p> <p>7 who is Chris Slatosch?</p> <p>8 A. Chris Slatosch is a convention runner in Texas.</p> <p>9 He has several conventions in the state.</p> <p>10 Q. Does he run Kameha Con?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. And are there any other conventions that have</p> <p>13 listed both you and Vic to have appearances, that you</p> <p>14 have told them you would not attend if Vic is present?</p> <p>15 A. No, ma'am. The only one I can think of is</p> <p>16 Kameha Con.</p> <p>17 Q. Okay. And have you -- have you threatened to</p> <p>18 not attend conventions if they invite Vic?</p> <p>19 A. I don't think that's in my stipulations, no.</p> <p>20 Q. And have you had any voice actors, through your</p> <p>21 career, say things about you that are untrue?</p> <p>22 A. Not that I can think of, offhand.</p>
<p>3 Q. And why did you not attend the Kameha Con?</p> <p>4 A. Because Vic was attending, and I was worried</p> <p>5 about my safety.</p> <p>6 Q. Did you do a separate signing that weekend?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Okay. And what about the River Region Comic</p> <p>9 Con? Sorry.</p> <p>10 A. I had norovirus so I could not go. It was</p> <p>11 awful.</p> <p>12 THE WITNESS: Thanks, Ron.</p> <p>13 Q. (BY MS. CHRISTIE) Sorry about that.</p> <p>14 A. No, it was the worst. It was awful. I don't</p> <p>15 wish that on anyone.</p> <p>16 Q. No, I would not wish that on anybody.</p> <p>17 A. It's bad.</p> <p>18 Q. Okay. With regard to these conventions, do you</p> <p>19 know any of the owners or organizers?</p> <p>20 A. I've met a few.</p> <p>21 Q. Are there any that you speak to on a regular</p> <p>22 basis?</p> <p>23 A. Not on a regular basis, no.</p> <p>24 Q. Okay. And have -- have there been any owners</p> <p>25 or organizers that you have spoken to about Vic?</p>	

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1

2 THE VIDEOGRAPHER: And we're going off the

3 record at 11:03.

4 (Break taken from 11:03 a.m. to 12:29 p.m.)

5 THE VIDEOGRAPHER: And we're back on the

6 record. The time is 12:29.

7 MS. CHRISTIE: At this time, we will pass

8 the witness.

9 MR. VOLNEY: No questions for me.

10 MR. JOHNSON: No questions at this time.

11 MR. ERICK: We'll reserve ours for trial.

12 Thanks.

13 THE VIDEOGRAPHER: And we're going off the

14 record at 12:29.

15

16 (Deposition concluded at 12:29 p.m.)

17

18

19

20

21

22

23

24

25

83

1 I, MONICA RIAL, have read the foregoing

2 deposition and hereby affix my signature that same is

3 true and correct, except as noted above.

4

5 _____

6 MONICA RIAL

7 THE STATE OF _____)

8 COUNTY OF _____)

9

10 Before me, _____, on this day

11 personally appeared MONICA RIAL, known to me (or proved

12 to me under oath or through _____)

13 (description of identity card or other document) to be

14 the person whose name is subscribed to the foregoing

15 instrument and acknowledged to me that they executed the

16 same for the purposes and consideration therein

17 expressed.

18 Given under my hand and seal of office this

19 _____ day of _____, _____.

20

21

22 _____

23 NOTARY PUBLIC IN AND FOR

24 THE STATE OF _____

25 COMMISSION EXPIRES: _____

82

1 CHANGES AND SIGNATURE

2 WITNESS NAME: MONICA RIAL DATE: JUNE 28, 2019

3 PAGE LINE CHANGE REASON

4 _____

5 _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

25 _____

84

1 NO. 141-307474-19

2 VICTOR MIGNOGNA,) IN THE DISTRICT COURT

3)

4 Plaintiff,)

5)

6 VS.) TARRANT COUNTY, TEXAS

7)

8 FUNIMATION PRODUCTIONS,)

9 LLC, JAMIE MARCHI, MONICA)

10 RIAL, and RONALD TOYE,)

11)

12 Defendants.) 141st JUDICIAL DISTRICT

13

14 REPORTER'S CERTIFICATION

15 DEPOSITION OF MONICA RIAL

16 JUNE 28, 2019

17 I, Claudia White, Certified Shorthand Reporter in

18 and for the State of Texas, hereby certify to the

19 following:

20 That the witness, MONICA RIAL, was duly sworn by

21 the officer and that the transcript of the oral

22 deposition is a true record of the testimony given by

23 the witness;

24 That the deposition transcript was submitted on

25 _____ to the witness or to the attorney for

the witness for examination, signature and return to CSI

Global Deposition Services by _____;

That the amount of time used by each party at the

deposition is as follows:

Ms. Carey-Elisa Christie, Esq. - 01 HOURS:46

MINUTE(S)

Mr. Casey S. Erick, Esq. - 00 HOURS:00 MINUTE(S)

DEPOSITION OF MONICA RIAL

June 28, 2019

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1 Mr. John Volney, Esq. - 00 HOURS:00 MINUTE(S)
Mr. Sam Johnson, Esq. - 00 HOURS:00 MINUTE(S)

2
3 That pursuant to information given to the
4 Deposition officer at the time said testimony was taken,
5 the following includes counsel for all parties of
6 record:

7 Ms. Carey-Elisa Christie, Esq., and Mr. Ty Beard,
Esq., Attorneys for Plaintiff

8 Mr. Casey S. Erick, Esq., Attorney for Defendants
Monica Rial and Ronald Toye


9 Mr. John Volney, Esq., Attorney for Defendant
Funimation

10 Mr. Sam Johnson, Esq., Attorney for Defendant
Jamie Marchi

11 I further certify that I am neither counsel for,
12 related to, nor employed by any of the parties or
13 attorneys in the action in which this proceeding was
14 taken, and further that I am not financially or
15 otherwise interested in the outcome of the action.

16 Further certification requirements pursuant to Rule
17 203 of TRCP will be certified to after they have
18 occurred.

19 Certified to by me this 29th day of June, 2019.

20
21 
22 Claudia White, Texas CSR #8242
Expiration Date: 5/31/21
Firm Registration No. 526
23 CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
24 Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
25 production@courtroomsciences.com

86

1 FURTHER CERTIFICATION UNDER RULE 203 TRCP

2 The original deposition was/was not returned to the
3 deposition officer on _____;


4 If returned, the attached Changes and Signature
5 page contains any changes and the reasons therefor;

6 If returned, the original deposition was delivered
7 to Ms. Carey-Elisa Christie, Custodial Attorney;

8 That \$_____ is the deposition officer's
9 charges to the Plaintiff for preparing the original
10 deposition transcript and any copies of exhibits;

11 That the deposition was delivered in accordance
12 with Rule 203.3, and that a copy of this certificate was
13 served on all parties shown herein on and filed with the
14 Clerk.

15 Certified to by me this _____ day of
16 _____, 2019.

17
18 
19 Claudia White
Texas CSR #8242
20 Expiration Date: 5/31/21
Firm Registration No. 526
21 CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
22 Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
23 production@courtroomsciences.com
24
25



Monica Rial

@Rialisms

Following

Replying to @StiffyDale @xXRaiBearXx @1zAMusicalGeek

That's not true. I've spoken up for years.
Unfortunately, nobody did anything about it
until now.

6:48 AM - 19 Feb 2019

2 Retweets 14 Likes



33

2

14



EXHIBIT 32
WIT: M. Rial
DATE: 6/28/19
Claudia White, CSR

Exhibit 32



Monica Rial @Rialisms

Follow

These last few weeks have been some of the hardest of my lifetime. Please understand that we are ALL hurting. No matter what you choose to believe, please be kind. <3

First, please know that I've tried to address his behavior with him, I'm the kind I tell you when you have food in your teeth and I was tired of people talking at his back. How would he change if he didn't know his behavior was wrong? Each time he apologized and then he was back at it within weeks. The studios slowly began to stop, not just because of sexual harassment, but because he was difficult to work with. He had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, kiss my cheek/neck. This was in front of fans or colleagues so I had to be very careful about how I reacted. I didn't know it was inappropriate because he did it to so many people. I've witnessed others have witnessed it happen to me; colleagues and fans.

In the mid-2000s we were at a convention together and he grabbed me and kissed me in a room. I froze. You may wonder why I didn't yell or scream or push him away. Why? Because I was raped as a teenager and I learned that sometimes fighting back doesn't work. Why did I go to his room? Because he asked me to watch a video and because he was my friend. Not only that, but he was dating my friend Michele and I was dating with my soon-to-be-boyfriend at the convention all weekend. After that, I distanced myself from him and unfortunately Michele as well. I felt insecure though I hadn't done anything wrong. I went to therapy and worked on forgiving him for what he had done. Maybe it was just me? Maybe it was a cycle that was repeated again? You can imagine my devastation when I learned this one. That it was happening to colleagues, and worse yet, convention attendees

All the pictures and messages that are being passed around seem to be at the...
I don't want to come forward on Twitter but I feel like I had to do something...
I'm tired of the threats, all of it. From here on, any threats or retaliation will be met with an immediate response. This has been incredible...
I've loved the anime fan community. To be threatened like this by the community is...
I don't want him to be labeled a predator for life. I wish I could help many people, including me. If he takes...
I'm tired of the threats, all of it. From here on, any threats or retaliation will be met with an immediate response. This has been incredible...
I've loved the anime fan community. To be threatened like this by the community is...
I don't want him to be labeled a predator for life. I wish I could help many people, including me. If he takes...
I'm tired of the threats, all of it. From here on, any threats or retaliation will be met with an immediate response. This has been incredible...
I've loved the anime fan community. To be threatened like this by the community is...
I don't want him to be labeled a predator for life. I wish I could help many people, including me. If he takes...

5:15 PM - 19 Feb 2019

2,347 Retweets 10,251 Likes

2.6K 2.3K 10K



Tweet your reply



MistareFusion @MistareFusion · 11h

Replying to @Rialisms

Thank you so much for coming forward and having the courage to endure all the slings and arrows, even though you should never have had to. God forbid, but if I ever found myself in such a situation, I hope I'd have the courage to stand up too. It's the only way to foster change.

1 1 38

1 more reply



Guy Hero @theman22022 · 14h

Replying to @Rialisms

Vic only wanted peace. He told his fans to not start anything. But then you started attacking him and his fans. So they fought back. And here we are. You lashed out at people who wanted the proof. Nothing has been shown. Until there's actually proof. No one will stop. Im stopping



Exhibit 22

First, please know that I've tried to address his behavior with him. I'm the kind of friend that will tell you when you have food in your teeth and I was tired of people talking about him behind his back. How would he change if he didn't know his behavior was wrong? Each time, he would apologize and then be back at it within weeks. The studios slowly began to stop working with him, not just because of sexual harassment, but because he was difficult to work with. Even though he had a huge fan following, directors began to look elsewhere.

Whenever he saw me he would take a fist full of my hair, pull my head back, and either whisper so closely to my ear that his lips were touching or kiss my cheek/neck. This was usually done in front of fans or colleagues so I had to be very careful about how I reacted. I didn't even realize how inappropriate it was because he did it to so many people. I've witnessed it happen, just as others have witnessed it happen to me; colleagues *and* fans.

In the mid-2000s we were at a convention together and he grabbed me and kissed me in his hotel room. I froze. You may wonder why I didn't yell or scream or push him away. I was scared. Why? Because I was raped as a teenager and I learned that sometimes fighting back makes it worse. Why did I go to his room? Because he asked me to watch a video and I trusted him because he was my friend. Not only that, but he was dating my friend Michele and I had been flirting with my soon-to-be-boyfriend at the convention all weekend. After that experience, I distanced myself from him and unfortunately Michele as well. I felt incredibly guilty even though I hadn't done anything wrong. I went to therapy and worked on forgiveness. I chose to forgive him for what he had done. Maybe it was just me? Maybe it was a one-time thing never to be repeated again? You can imagine my devastation when I learned that I wasn't the only one. That it was happening to colleagues, and worse yet, convention attendees.

All the pictures and messages that are being passing around were taken at the press events and premiere for the Broly movie in mid-December. About 2 weeks after that, three of my close friends came forward. When these friends shared their stories with me, I was heartbroken. How could this happen to three of my close friends without me ever knowing? As more people came forward, I began to see the similarities. I chose to share my testimony with investigators solely because it corroborated the others' testimony. I didn't start this, I have nothing to gain from it, I didn't steal anyone's roles or titles; the stuff you're hearing on YouTube is all lies attempting to create drama and get subs/views. I'm perfectly content being *just* a voice actor.

The investigations were incredibly thorough. Each person was interviewed, the evidence weighed, and a decision made. Each company has to look out for the safety of their employees. In this instance, these companies felt they made the best decision to protect their employees and contract workers. Also, these companies aren't obligated to share any information with you. Many of the women who've come forward have chosen to remain anonymous, especially after seeing the way that I've been attacked. Please respect their privacy.

I didn't want to come forward on Twitter but I felt like I had to do something because my friends' lives, children, and careers were being threatened. Also, I knew if I didn't, there was a very good chance that this would just get swept under the rug... again.

I apologize for lashing out and threatening fans. I don't want to have to take people to court or send law enforcement after them but I was doing what I felt necessary to protect myself at the time. There is a watch list and I have the names and numbers of multiple harassers, but I'm willing to forgive if you'll stop the madness now. You may feel that my colleagues and I have been harsh, but let me ask you this: how would you respond if your life was being threatened? If the lives of your loved ones, your friends, your friends' children, were being threatened? If your addresses and phone numbers were being passed around like candy so people could call or drop by just to antagonize you? If the local authorities made sure to drive past your house daily, just to make sure you're okay? If you were forced to be on the phone with various law enforcement and lawyers every single day? If people were trying to get you fired just because you came forward with the truth? If you were doxxed because people think it's fun to attack those who are hurting?

I have always stood up for this community. I have loved the anime fandom from the moment I went to my first convention. To be threatened like this by the community I love, really hurts my heart. I recently stood up for the Dragon Ball fandom, only to have that community come back and attack me mercilessly. It has been so incredibly painful, I can't even express.

I have never said anything hurtful toward Vic or any of his fans. I don't want to ruin his life, he was/is my friend. I don't want him to be labeled a predator for life. I want him to get help and realize that his actions have hurt many people, including me. If he takes the necessary steps to better himself, then perhaps I would be willing to forgive him again.

I'm tired of the fighting, I'm tired of the threats, all of it. From here on, I will only be posting positivity and light. Any threats or retaliation will be met with an immediate block. I'm not wasting any more time on this matter. It's over. This has been incredibly difficult for everyone involved. Please be kind to one another. <3

Much love,
Monica

← **Tweet**



The Lazy Gamer @The_Lazy_Gam... · 1h ▾

Question, what do you consider consent? Before he leans in to kiss you does he have to say "May I kiss you"? You realise how weird that would be? It's all body language when people go to kiss each other, if he goes to kiss you and you're not feeling it, just say no.

💬 4 ↺ ❤️ 🔗



Monica Rial ✓
@Rialisms ▾

Replying to @The_Lazy_Gamer1 @go_taint and @b3lieving

I went to friend's room who was in a committed relationship and he grabbed me by my upper arms and French kissed me. That is inappropriate.

9:43 PM · Feb 19, 2019 · Twitter for iPhone

11 Likes

💬 ↺ ❤️



EXHIBIT 34
WIT: M. Rial
DATE: 01/28/19
Claudia White, CSR

Exhibit 34

EXHIBIT O

DEPOSITION OF RONALD TOYE

June 27, 2019

1	3
<p>NO. 141-307474-19 VICTOR MIGNOGNA,) IN THE DISTRICT COURT) Plaintiff,)) VS.) TARRANT COUNTY, TEXAS)) FUNIMATION PRODUCTIONS,) LLC, JAMIE MARCHI, MONICA) RIAL, and RONALD TOYE,)) Defendants.) 141st JUDICIAL DISTRICT</p>	<p>INDEX PAGE 1 2 Appearances..... 2 3 4 5 RONALD TOYE 6 EXAMINATION BY MR. BEARD..... 5 7 8 Signature and Changes..... 212 Reporter's Certificate..... 214 9</p>
<p>----- ORAL AND VIDEOTAPED DEPOSITION OF RONALD TOYE JUNE 27, 2019 -----</p>	<p>EXHIBITS 10 Exhibit 25 Previously marked-prettyuglylittleliar.net.....192 11 Exhibit 28 Tweets made by Mr. Toye..... 37 12</p>
<p>ORAL AND VIDEOTAPED DEPOSITION OF RONALD TOYE, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on June 27, 2019, from 9:28 a.m. to 3:49 p.m., before Claudia White, CSR in and for the State of Texas, reported by machine shorthand, at the 141st Judicial District Court, 100 North Calhoun Street, 1st Floor, Fort Worth, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto. Job No. 132313</p>	<p>REQUESTED DOCUMENTS/INFORMATION 14 NO. DESCRIPTION PAGE 15 NONE 16</p>
<p>----- A P P E A R A N C E S 1 2 3 FOR THE PLAINTIFF: Mr. Ty Beard, Esq. Ms. Carey-Elisa Christie, Esq. 4 BEARD HARRIS BULLOCK HUGHES, PC 100 Independence Place 5 Suite 101 Tyler, Texas 75703 6 (903) 509-4900 ty@beardandharris.com carey@beardandharris.com 7 8 FOR THE DEFENDANT RONALD TOYE AND MONICA RIAL: Mr. Casey S. Erick, Esq. 9 COWLES & THOMPSON 901 Main Street 10 Suite 3900 Dallas, Texas 75202 11 (214) 672-2000 cerick@cowlesthompson.com 12 13 FOR THE DEFENDANT FUNIMATION: Mr. John Volney, Esq. LYNN PINKER COX & HURST, LLP 14 2100 Ross Avenue Suite 2700 15 Dallas, Texas 75201 (214) 981-3839 jvolney@lynnllp.com 16 17 FOR THE DEFENDANT JAMIE MARCHI: Mr. Sam Johnson, Esq. 18 JOHNSON SPARKS 7161 Bishop Road Suite 220 19 Plano, Texas 75024 (972) 918-5274 sam@johnsonsparks.com 20 21 22 FOR THE VIDEOGRAPHER: Mr. John Franks 23 24 ALSO PRESENT: Ms. Monica Rial 25</p>	<p>CERTIFIED QUESTIONS 17 18 NO. PAGE/LINE 19 NONE 20 21 22 23 24 *XXXX identifies redacted names in the transcript per 25 confidentiality stipulation</p>
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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 THE VIDEOGRAPHER: And we're going on the 2 record in the videotaped deposition of Mr. Ronald Toye. 3 Today's date is June 27, 2019. The time is 9:28 a.m. 4 At this time will counsel please state their appearances 5 for the record, and then the court reporter will swear 6 in the witness. 7 MR. BEARD: Ty Beard appearing for Victor 8 Mignogna. 9 MR. ERICK: Casey Erick here for Ron Toye 10 and Monica Rial. 11 MR. JOHNSON: Sam Johnson for Defendant 12 Jamie Marchi. 13 MR. VOLNEY: John Volney for Funimation. 14 MS. CHRISTIE: Carey Christie for Victor 15 Mignogna. 16 MR. ERICK: Defendants have the same 17 agreement, that one objection applies to all defendants. 18 And we also want to confirm on the record that the 19 confidentiality agreement made yesterday during 20 Mr. Mignogna's deposition remains in effect subject to 21 the court's ruling today, this morning, regarding the 22 affidavits produced June 26 by Defendants Monica Rial 23 and Ron Toye in their supplemental -- I'm sorry, in 24 their amended responses to disclosures. 25 MR. BEARD: Yes, I agree.</p>

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1 Counsel, do y'all agree?
2 MR. VOLNEY: Yes.
3 MR. BEARD: Sam?
4 MR. JOHNSON: Oh, I'm sorry.
5 MR. ERICK: Do you agree?
6 MR. JOHNSON: With what?
7 MR. ERICK: What I just said.
8 MR. JOHNSON: Yes, agreed.
9 MR. BEARD: Okay. Turn your wallet over to
10 him.
11 (Oath administered.)
12 THE REPORTER: Will this be taken under the
13 Texas Rules of Civil Procedure?
14 MR. ERICK: Yes.
15 MR. BEARD: Yes.
16 MR. JOHNSON: Yes.
17 MS. CHRISTIE: Yes.
18 MR. VOLNEY: Yes.
19 RONALD TOYE,
20 having been first duly sworn, testified as follows:
21 DIRECT EXAMINATION
22 BY MR. BEARD:
23 Q. Mr. Toye, I'm Ty Beard. I represent Victor
24 Mignogna in this case, he's the Plaintiff.
25 Have you ever been deposed before?

6

1 A. Yes.
2 Q. Okay. So you're familiar with the process,
3 basically?
4 A. Somewhat, yes.
5 Q. Okay. Let's go over it just to be sure. The
6 ground rules are pretty simple. I'll ask questions and
7 you'll answer. And if you would, don't interrupt me
8 while I'm asking, just because the court reporter wants
9 to be able to take it all down. If I ask you a question
10 that doesn't make any sense, feel free to say, Can you
11 rephrase that, or, I don't understand. I'll let you
12 answer your question.
13 There will be objections occasionally.
14 Your counsel may object to form or to privilege. I
15 would suggest that when you hear your client -- your
16 counsel object, you stop talking. But objections to
17 form, generally speaking, you still have to answer. We
18 just get it recorded.
19 I may object to nonresponsive. That's
20 really a technical thing. I'm not, you know, trying to
21 offend you or anything. But we -- as Sam said
22 yesterday, we have to control the -- the dialogue. But
23 feel free to answer completely, any question that I ask.
24 If I ask it unfairly, such as, Do you still beat your
25 wife? It's okay to say, I don't beat my wife, you know.

7

1 Do you have any questions?
2 A. Nope.
3 Q. Okay.
4 I think the court reporter asks that. Do
5 you ask about reading and signing the deposition?
6 THE REPORTER: You have the opportunity to
7 read and sign your transcript after it's over.
8 MR. ERICK: He'll -- yes, we agree to that.
9 He'll read and sign. Thank you.
10 THE REPORTER: Thank you.
11 Q. (BY MR. BEARD) Mr. Toye, what's your full
12 name?
13 A. Ronald Joseph Toye, III.
14 Q. Are you the fiancée of Monica Rial?
15 A. Yes.

8

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1 A. Yes.

2 Q. (BY MR. BEARD) You think that would be totally

3 fair?

4 A. Yes.

5 Q. Okay. Is it reasonable for someone -- scratch

6 that.

7 Is it fair for someone to accuse you of

8 being a pedophile when they have no actual knowledge,

9 i.e., they didn't see it?

10 MR. ERICK: Objection, form.

11 A. What's interesting about that, what you're

12 saying, is, with pedophilia, I'm -- I'm going to make an

13 assumption that it's probably not done in public and the

14 child didn't have a camera on them.

15 Q. (BY MR. BEARD) Okay.

16 A. So I don't know how hard I would dig into a --

17 that situation.

18 Q. If you were accused of being a pedophile you

19 don't think you would dig into the nature of the

20 accusation; is that --

21 MR. ERICK: Objection, form.

22 A. Again, because if you're asking me as a person,

23 and I know I didn't do that, no, I wouldn't dig into it.

24 Q. (BY MR. BEARD) Even though hypothetically you

25 could lose your job and not be able to make a living in

34

1 your business, you would not dig into it; is that what

2 you're saying?

3 MR. ERICK: Objection, form.

4 A. With that person.

5 Q. (BY MR. BEARD) What person?

6 A. The person that is accusing me, or the company.

7 Q. Okay. What if 30 people accuse you of

8 being a pedophile, and the company just fires you and

9 there's no investigation, is that okay?

10 A. Absolutely.

11 MR. ERICK: Objection, form.

12 Q. (BY MR. BEARD) Okay.

13 THE WITNESS: Oh, I'm sorry.

14 MR. ERICK: Yeah. That's all right.

15 Q. (BY MR. BEARD) Okay. Let's shift to another

16 thing entirely.

17 A. Uh-huh.

18 Q. Are there any health issues preventing you from

19 testifying fully and truthfully in this deposition?

20 A. No.

21 Q. Are you taking any medications that might

22 affect your memory or your ability to testify today?

23 A. No.

24 Q. Other than your attorney, did you meet with

25 anyone to prepare for this deposition?

35

1 A. No.

2 Q. Have you met with any witnesses in this case to

3 prepare for this deposition?

4 A. No.

5 Q. Okay. Did you review any documents to prepare

6 for this deposition?

7 A. No.

8 Q. What do you do for a living, Mr. Toye?

9 A. I'm a loan officer.

10 Q. What company do you work for?

11 A. Mid America Mortgage now.

12 Q. Are you an employee or an owner?

13 A. I'm an employee.

14 Q. Is Mid America a franchisee? In other words,

15 do they franchise with a national company?

16 A. So Mid America is the umbrella, and then

17 there's branches within it, but I work for Mid America.

18 Q. Okay. Are you employed by an individual branch

19 of Mid America?

20 A. It's employed by Mid America.

21 Q. Okay. Okay. So the branch you work for is

22 owned and part of Mid America?

23 A. Correct.

24 Q. Okay. I was just trying to figure that out. I

25 went to --

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1 A. Yeah.

2 Q. -- their website, and I couldn't sort that out.

3 What's your Twitter name or handle?

4 A. I'm not sure. I think it's --

5 Q. What's your Twitter handle? Excuse me.

6 A. I'm not sure. I think it's rontoye or

7 rontoye3.

8 Q. Is your Twitter handle rontoye?

9 A. That sounds right, maybe.

10 Q. Okay. Do you have your phone with you?

11 A. No.

12 Q. Okay. I got to put my phone in evidence, but

13 I'll just show this.

14 MR. ERICK: We're going to look at your

15 phone?

16 MR. BEARD: I'm going to flash a

17 screenshot.

18 MR. ERICK: All right. Well, then let's

19 make it an exhibit, then.

20 MR. BEARD: Seriously?

21 MR. ERICK: Well, yeah. If we're going to

22 ask witnesses that the entire --

23 MR. BEARD: Okay. Never mind.

24 MR. ERICK: Well, I just -- if we're going

25 to ask questions --

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1 (Exhibit 28 marked.)
2 Q. (BY MR. BEARD) I'm going to hand you what's
3 been marked as Exhibit 28. We'll do it the hard way.
4 MR. BEARD: I apologize to John --
5 MR. ERICK: Thank you.
6 MR. BEARD: -- and Sam. We didn't print
7 binders out for you guys.

25 Q. Who's paying your leg -- the legal fees that

39

1 you're incurring for this case?
2 A. Monica and I.
3 Q. Okay. Is Funimation, in any way, directly or
4 indirectly, paying your legal expenses?
5 A. No.

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16 Q. Sure. Do you know if there was an
17 investigation by Funimation of Victor Mignogna with
18 regards to the allegations of sexual misconduct that
19 have come out this year?
20 A. I know they spoke to Monica.
21 Q. Funimation --
22 A. Correct.
23 Q. -- spoke to Monica?
24 How do you know that?
25 A. Because she is my fiancée.

42

1 Q. She told you?
2 A. Yes.
3 Q. Is that correct?
4 A. Yes.
5 Q. Okay. When did she tell you about --
6 A. I don't remember.
7 Q. -- about that?
8 A month ago?
9 A. I'm not sure.
10 Q. What I'm asking is, was it more than a month
11 ago?
12 A. I'm not sure.

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18 A. I do not remember.

19 Q. Okay. Okay. Okay. Please read the

20 sentence start -- read the whole thing, starting with, I

21 can't speak.

22 A. I can't speak to all accounts of people who

23 have come forward with their personal experiences with

24 Vic, but I know with 100 percent certainty that he

25 assaulted four people I love. I am sorry to all the

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1 people he has hurt, and I stand with the victims.

2 Q. Okay. You said you don't remember if you sent

3 this tweet.

4 A. Correct.

5 Q. Do you believe that Vic Mignogna assaulted four

6 people that you love?

7 A. Yes, I do.

8 Q. Okay. Who are they?

9 MR. ERICK: Yeah. With this -- I mean, we

10 can't -- this would be under the confidentiality

11 agreement from yesterday, of those four individuals.

12 MR. BEARD: Oh, yeah, yeah, yeah.

13 MR. ERICK: So -- okay.

14 MR. BEARD: Well, I mean, other than the

15 parties, obviously.

16 MR. ERICK: Right, other than the

17 parties --

18 MR. BEARD: Yeah, yeah.

19 MR. ERICK: Correct.

20 MR. BEARD: No, that's fine.

21 MR. ERICK: So we'll do the same thing as

22 we did yesterday, that the -- the names will be

23 confidential, redacted.

24 MR. BEARD: Yeah. I think the deal was we

25 agreed that we would redact anything if we --

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1 MR. ERICK: Well, they'll -- they're

2 confidential. So -- so for the purposes of his answer,

3 we'll go ahead, but at this point these names, if

4 they're not parties, are -- you know, we'll redact them

5 according to our prior agreement.

6 MR. BEARD: Okay.

7 Q. (BY MR. BEARD) Who are they, the four people

8 that you think he assaulted?

9 A. I believe that he assaulted Monica Rial.

10 Q. Okay.

11 A. XXXXX XXXX, XXXX XXXX.

12 Q. Slow down, because I'm writing here very slow.

13 A. And XXXX XXXXXXXXXX.

14 Q. How do you know that he assaulted Monica Rial?

15 A. She told me.

16 Q. Okay. Describe the assault that he conducted

17 on her.

18 A. What Victor Mignogna had -- how he assaulted

19 Monica was, he invited her up to his room. He then

20 cornered her, grabbed her, kissed her, threw her on a

21 bed, continued to kiss her, and thankfully somebody

22 stopped it by interrupt -- by knocking on the door.

23 Q. Do you know who that somebody was?

24 A. I can't remember the name.

25 Q. Okay. That's fine.

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1 You weren't there to witness any of this,

2 right?

3 A. I was not there.

4 Q. Okay. How long ago did this occur?

5 A. I'm not sure. It didn't happen to me.

6 Q. Well, how long ago did Monica say it occurred?

7 A. I think she mentioned 2007.

8 Q. 2007. Okay.

9 When did she tell you about this assault?

10 A. Like, a couple of days before the 24th.

11 Q. Of January?

12 A. Uh-huh.

13 Q. Okay. How long have y'all been dating?

14 A. Gosh, nearly five years.

15 Q. And in that five years be -- approximately,

16 before January 24th, she never, one time, mentioned that

17 he assaulted her?

18 A. She did not.

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23 Q. Okay. How do you know -- well, back up.
24 Describe the assault on XXXXX -- the
25 purported -- I'm going to ask, the purported assault on

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1 XXXXX and XXXX XXXX occurred while they were together;
2 is that correct?
3 A. Uh-huh, that's correct.
4 Q. Okay. Describe that, please.
5 A. Sure. Again, he invited them up to their [sic]
6 room. He began to speak to them about -- asking them --
7 told them that he'd brought them up there because he
8 didn't want to go to a strip show with their friends.
9 And then he said, I'd rather see you two strip. He
10 then -- they -- he -- then XXXXX said -- or XXXX, I
11 can't remember the exact pert -- part, but they said,
12 You're old enough to be my dad.
13 And then they became terrified when he got
14 angry and said, I'm not that old. I look like I'm in my
15 forties.
16 Then Vic -- they continued to go on. And
17 then the girls were terrified because he went from being
18 the nice, charming Vic, to, I -- in their opinion, a
19 monster, and they wanted to leave.
20 They said they had to leave. Vic said
21 okay, walked with them to the door, grabbed XXXXX,
22 kissed her, and then proceeded to do the same thing to
23 XXXX. And then they got in the elevator and bawled
24 their eyes out.
25 Q. And that's what they told you; is that correct?

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1 A. That's correct.
2 Q. You weren't there, of course?
3 A. I was not there.
4 Q. Did they tell you why they went to his room?
5 A. Yes. They were going up there because they
6 thought he was a nice guy, a good Christian guy, and he
7 was going to be nice to them. They had met him a couple
8 of times, always been really sweet. So they thought it
9 would be fine to go up there and have a talk. Wanted to
10 get away from the loudness of the convention.

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6 Q. How long have you known them?

7 A. Three years, three or four years.

8 Q. So they didn't tell you about this until
9 sometime this year? That's a question.

10 A. No. They told me they had a horrible
11 interaction with Vic that they wouldn't speak about. I
12 didn't have the details.

13 Q. About when did they tell you that?

14 A. Really, pretty quickly after meeting us.

15 Q. Okay. Which you're thinking is around three
16 years ago?

17 A. Three to four years, yes.

18 Q. Three to four. Okay. That's fine.

19 Do you have any idea what prompted them to
20 tell you these things this year?

21 A. I'm not sure what prompted it. Probably the
22 uproar of what's going on.

23 Q. Okay.

24 A. I've had a lot of girls tell me some of their
25 stuff and story about Vic assaulting them.

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<p style="text-align: right;">69</p> <p>1</p>	<p>8 What do you think the mysterious person who 9 posted this tweet meant?</p> <p>10 MR. ERICK: Objection, form.</p> <p>11 A. I think that this is my Twitter handle so I 12 tweeted this.</p> <p>13 Q. (BY MR. BEARD) Okay.</p> <p>14 A. And what they meant was, and what I believe, 15 based on what I know about the four victims we've 16 already addressed and the research I've done online, and 17 this was done on the 25th, which is four days after 18 Vic's own testimony admitting he messed up, that 19 there -- and looking online, io9 articles or whatever 20 articles in Google searches and YouTube and all of that, 21 there's hundreds of people talking online about this for 22 years and years.</p> <p>23 Q. And so if there's talk for years and years, it 24 must be true?</p> <p>25 MR. ERICK: Objection, form.</p>
	<p style="text-align: right;">72</p> <p>1 A. In this situation, what I'm talking about for 2 Victor Mignogna, I believe it, without question, to be 3 true, because of the personal experiences that people 4 very close to me related, and then hundreds and hundreds 5 of accounts online, and his own admission on the 21st 6 that he failed to ask for consent.</p>

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1 MR. ERICK: Objection, form.
2 Q. (BY MR. BEARD) Really. Okay.
3 Who is XXXX XXXXXXXXXXXX?
4 A. She's a lady I know. Really good, close,
5 personal friend. She used to work at Funimation.
6 Q. Okay. And what did she tell you about being
7 assaulted by Vic Mignogna?
8 A. She let me know that she was in her office, Vic
9 came in, closed the door, and then grabbed and kissed
10 her. And then at the end said something along the lines
11 of, I hope that's okay. And then walked out.
12 Q. So the story she told you was he kissed her
13 first, then said, I hope that's okay?
14 A. Yeah. Hope you don't mind, and walked out.
15 Q. Okay.
16 A. Something around there.
17 Q. And she told you that story -- did she -- you
18 got that from her?
19 A. Yes, from her.
20 Q. Okay. And just to be clear, XXXXX and XXXX
21 XXXX, they told you --
22 A. Yes.
23 Q. -- their -- their account? Okay. Okay.
24 How do you know Ms. XXXXXXXXXXXX?
25 A. She's a friend of mine.

3 Q. Sure. Do you ever remember things that didn't
4 happen?
5 A. No.
6 Q. How do you know?
7 A. Because I wouldn't remember something that
8 didn't happen.
9 Q. Why not?
10 MR. ERICK: Objection, form.
11 A. Because it doesn't even make -- that question
12 doesn't even make sense.

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1 A. Sure. No problem.
2 Q. 171 to 180 --
3 A. Cool.
4 Q. -- if you would, review those and tell me if
5 you recall making those tweets.
6 A. Nope. I don't recall making them, but I know
7 that this is my Twitter handle.
8 Q. Okay. The question I'm asking you is, do you
9 recall making the tweets?
10 A. No.
11 Q. Okay. But we've already established, I think,
12 and you can agree or disagree, that in every case this
13 is your Twitter handle?
14 A. Yes, up to page 180.
15 Q. The @rontoye is on every -- is on every page
16 that you looked at.
17 A. Uh-huh.
18 Q. And as I recall, you don't have any
19 recollection of your Twitter account being hacked or
20 anything like that?
21 A. That's correct, I don't.
22 Q. Okay. And no one else uses your account to
23 tweet, correct?
24 A. That's correct.
25 Q. Okay. Okay. Well, I'll just ask it straight

?

3 Q. Oh, I'm sorry, 161 to 170.
4 A. I do not remember when I made all these tweets.
5 Q. Well, do you remember if you made those tweets?
6 A. Oh, yeah. I think we -- I think I mentioned
7 that, that it looks like it's from my account. So, so
8 far, yeah, all of these I would say I made. I just
9 don't remember when.
10 Q. Well, flip back and tell me -- start with the,
11 yes, I made it part --
12 A. I thought we --
13 Q. If I'm characterizing you correctly.
14 A. Let's start with 1 to 70 so far.
15 Q. Oh, okay. Are you saying that you did make all
16 those tweets?
17 A. Yeah. That's -- I thought when you said this
18 name, did anyone do this or this, would you assume, so,
19 yeah.
20 Q. Okay. Unfortunate that we -- I apologize for
21 not clarifying the question.
22 A. No worries. I wanted to honor your request.
23 Q. Appreciate you.
24 Well, we still have to go through it,
25 though.

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1 up.
2 A. Sure.
3 Q. Not being argumentative, just asking the
4 question.
5 **Are you willing to agree that these are**
6 **your tweets?**
7 A. Yes. So far to page 180?
8 Q. Through page 180.
9 A. Yes.
10 Q. Okay. Well, then we can maybe speed this up a
11 bit.
12 A. Sure. No worries.
13 Q. Let's go one -- look at pages 181 to 190, and
14 tell me if those are your tweets -- tell me if you made
15 those tweets.
16 A. I don't recall making them, but this is my
17 Twitter handle.
18 Q. Are those your tweets?
19 A. It looks like it, yes.
20 Q. Yes. Is that a yes?
21 A. Looks like it, yes.
22 Q. I need you to say yes or no.
23 A. Or it looks like it.
24 Q. Or I don't know. I mean, those are the --
25 A. Yeah, I'm not sure. It looks like it.

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1 Q. Please tell me one of the three, if you could.
2 Are they your tweets?
3 A. Looks like it.
4 Q. Let me try one more time. I would like yes,
5 no, or I don't know. I didn't ask if it looked like it,
6 I asked did you -- are those your tweets? Have you --
7 or, if you prefer, did you post those tweets?
8 A. It looks like I posted them.
9 MR. BEARD: Objection, nonresponsive.
10 Q. (BY MR. BEARD) No, we're going to keep asking
11 this question until I get an answer.
12 A. Cool.
13 Q. Yes, no, or I don't know?
14 A. It looks like I made those tweets.
15 MR. BEARD: Let's go off the record a
16 second.
17 A. Sure.
18 THE VIDEOGRAPHER: Counsel, do you agree?
19 MR. ERICK: No, I don't. Just -- I think
20 he's answering the question. He's saying that the --
21 the copies you've given him, the documents, are -- these
22 appear to be his tweets. He said, That's my Twitter
23 handle. No one else has used it.
24 MR. BEARD: He keeps answering a question I
25 didn't ask. And it's a very simple question here,

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1 Casey.
2 MR. ERICK: But these -- but listen -- I
3 understand. Listen. But these are -- are -- these are
4 taken out of a thread, I believe.
5 MR. BEARD: Casey, I don't care what his
6 answer is, I just want one of the three answers. And
7 there's no reason --
8 MR. ERICK: Okay.
9 MR. BEARD: I mean, you know --
10 MR. ERICK: All right. Then let's do it
11 again.
12 Give him one of the three answers.
13 MR. BEARD: Yes.
14 Q. (BY MR. BEARD) Yes, no or I don't know.
15 A. Can I go with or?
16 Q. No.
17 A. I don't know.
18 Q. Thank you.
19 MR. ERICK: Just listen.
20 A. Yeah, I don't know.
21 Q. (BY MR. BEARD) Are those your tweets?
22 A. I cannot with 100 percent say it. It looks
23 like it.
24 Q. Okay. Well --
25 A. It's chopped up, cut up. I don't see a URL.

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1 It looks like my tweet.
2 Q. Okay. Well, is that an, I don't know?
3 A. Correct.
4 Q. Thank you.
5 And does that "I don't know" apply to pages
6 1 through 190?
7 A. So far, yes.
8 Q. Thank you.
9 191 to 200.
10 A. Sure.
11 Q. Oh, I'm sorry. And tell us if you made these
12 tweets, whether you made these tweets.
13 A. Looks like my tweets.
14 Q. What page are we --
15 A. We're on --
16 Q. Please look at --
17 A. -- 201.
18 Q. -- 201 through 210, and tell us whether you
19 made those tweets.
20 A. Sure. It appears to be my tweet.
21 MR. BEARD: Objection, nonresponsive.
22 Q. (BY MR. BEARD) Did you make those tweets, yes,
23 no, or I don't know?
24 A. I am not a hundred percent sure if there is
25 anything that's been added or subtracted from this. So

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1 if I can't give you a hundred percent, if it is my
2 tweet, in fact, I can say it looks like my tweet.
3 Q. Mr. Toye, answer the question, please.
4 A. It looks like my tweet.
5 Q. That's not the question I asked. Answer the
6 question I asked, please.
7 A. I'm not sure.
8 MR. ERICK: He has, Ty. And, listen, I
9 mean, I -- and I've let you -- I've given you a little
10 rope here.
11 MR. BEARD: If you -- Casey, if you'd like
12 to stipulate on the record that "it looks like it" is "I
13 don't know," that's fine.
14 MR. ERICK: No. I'm not -- I'm not the one
15 under oath, so it doesn't matter --
16 MR. BEARD: Well --
17 MR. ERICK: But he's given you the answer.
18 At some point we're just -- we're just badgering the
19 witness.
20 MR. BEARD: Well, if I have to, I'll dis --
21 I'll -- I'll -- I'll call this and go up to the judge
22 and complain about being nonresponsive.
23 MR. ERICK: Okay. But that's not going to
24 change his answer. His answer is he thinks he
25 believes that -- look, he has said that's his Twitter

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1 handle, this -- these appear to be his tweets. These
2 are selected copies of certain tweets. He's given you
3 the very best answer that he -- that he can, and -- and
4 that's it. And if we just keep asking the same
5 question, at some point I'm just going to have to tell
6 him he's already answered, and that's it. So I -- I
7 understand you may not like the answer, but that's --
8 that's his answer.

9 MR. BEARD: No, I'm insisting on him
10 answering the question that I asked. At no point --

11 MR. ERICK: He has. He's not -- he's
12 not --

13 MR. BEARD: At no point did I say, Does
14 that look like your tweets? I said, Did you -- are
15 those your tweets or not? Did you send them or not?

16 MR. ERICK: That's his answer. I get it,
17 that you may not like it. I understand -- I think I
18 understand, but --

19 MR. BEARD: Okay. Saying that again
20 doesn't change anything.

21 MR. ERICK: But that's the truthful --
22 that's his truthful answer.

23 MR. BEARD: That doesn't alter reality.

24 MR. ERICK: Okay. I understand. He is
25 answering the question. He's not saying, I'm not

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1 answering the question. He's -- He's answered the
2 question. He's answered it several times, and I've
3 allowed it, but, to a point, I have to stop it. And
4 so -- you know, that's -- that's the best the witness
5 can do. I mean, these are -- these are selected tweets.
6 He's not -- he's not hiding from the fact that that's
7 not his Twitter handle. He's said that. And he's said
8 that, These look like to be my tweets.

9 MR. BEARD: Well, okay. We'll do this --
10 we'll do it the hard way, then, Casey. That's fine with
11 me.

12 MR. ERICK: I'm not sure what that means,
13 Ty, but --

14 MR. BEARD: That means I'm --

15 MR. ERICK: Why don't we ask the witness --

16 MR. BEARD: -- that means I'm going to file
17 a motion to compel and ask the court for more time --

18 MR. ERICK: Okay.

19 MR. BEARD: -- and go through all that
20 rigamarole, because, you see, you didn't produce any of
21 these tweets to us and --

22 MR. ERICK: Ty --

23 MR. BEARD: And I'm trying to authenticate
24 them in a deposition, and I'm getting, looks like, might
25 be, could be, don't know.

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1 MR. ERICK: No.

2 MR. BEARD: That's fine. That's fine.

3 MR. ERICK: No. He's saying that's his
4 Twitter handle. He's said, I don't -- I'm not aware of
5 anyone that's hacked it or used it. He said, These
6 appear to be my tweets. But these are selected
7 excerpts.

8 MR. BEARD: That's fine.

9 MR. ERICK: I mean, not -- these aren't --
10 these don't have other information that would
11 corroborate the fact that it was taken on a certain time
12 or date. So that -- that's it.

13 MS. CHRISTIE: They actually have dates.

14 MR. BEARD: Yeah, there are dates.

15 MR. ERICK: Okay. But just --

16 MS. CHRISTIE: They have specific dates.

17 THE WITNESS: I didn't -- this was given to
18 me.

19 MS. CHRISTIE: And some of them have
20 specific times.

21 THE WITNESS: You're asking me for --

22 MR. ERICK: He's not saying -- he's saying
23 that these appear to be my tweets, so I --

24 MR. BEARD: Objection, nonresponsive.
25 We'll move on.

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1 MR. ERICK: Okay. All right.

2 **Q. (BY MR. BEARD) Look at page 211 to 220. Did**
3 **you post these tweets?**

4 **A. It looks like it.**

5 **Q. When you say, It looks like it, is that yes,**
6 **no, or, I don't know?**

7 **A. It looks like it. I don't know. It's my**
8 **Twitter handle.**

9 **Q. I don't know, is that the answer?**

10 **A. It looks like that those are my tweets.**

11 MR. BEARD: Okay. Objection,
12 nonresponsive.

13 **Q. (BY MR. BEARD) Look at 221 to 230, and tell**
14 **us -- and answer the question for each of them, did you**
15 **post those tweets?**

16 **A. It looks like it.**

17 MR. BEARD: Objection, nonresponsive.

18 **Q. (BY MR. BEARD) Look at pages 231 to 240, and**
19 **please answer the question for each, did you post those**
20 **tweets. Or tell us the tweets you didn't post.**

21 MR. ERICK: Objection, form.

22 **Q. (BY MR. BEARD) I'll rephrase.**

23 MR. ERICK: Yes, just --

24 **Q. (BY MR. BEARD) Let's speed this up by simply**
25 **making each question inferred that you will tell us if**

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1 All right. Do these look like your tweets?
2 A. They do look like my tweets.
3 Q. Okay. Do all the other tweets in this binder
4 look like your tweets?
5 A. They do look like my tweets.
6 Q. Okay. Let's see. For reference --
7 A. Sure.
8 Q. -- the last tweet I showed you was April 4th,
9 2019.
10 A. Uh-huh.
11 Q. And it was our intention to produce these in
12 chronological order, and I'm sure some of them probably
13 aren't. But, generally speaking, my question is, after
14 April 4th, 2019, did you tweet about Vic Mignogna?
15 A. I'm not sure.
16 Q. You don't remember if you tweeted about him?
17 A. I can't recall.
18 Q. Okay. Did you tweet about Vic Mignogna last --
19 in the last seven days?
20 A. I can't recall.
21 Q. Did you tweet about Vic Mignogna in the last
22 two days?
23 A. I don't think so, but I can't recall.
24 Q. Okay. No mem -- you -- just to be clear, you
25 don't remember -- all I'm asking is if you tweeted about

115

1 question again?
2 MR. BEARD: Yeah.
3 MR. ERICK: Okay.
4 Q. (BY MR. BEARD) Have you contacted any
5 conventions and -- about -- about Vic Mignogna?
6 A. A convention.
7 Q. Okay. Which convention?
8 A. Kameha Con.
9 Q. Have you contacted any other conventions
10 besides Kameha Con?
11 A. Not that I can think of.
12 Q. You do not remember contacting any convention
13 about Vic Mignogna, other than Kameha Con; is that
14 correct?
15 A. Not that I can think of.
16 Q. How did you contact Kameha Con?
17 A. Through text message.
18 Q. Okay. Did you keep those text messages on your
19 phone?
20 A. Yes.

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1 him, not what you tweeted -- well, not yet, but not what
2 you tweeted. And you're saying you don't remember if
3 you tweeted about him at any time from April 4th to now?
4 A. I can't recall.
5 Q. Okay. All right. Have you communicated with
6 any conven -- well, okay. I'm going to use the term
7 convention for the next series of questions. And by
8 convention, I mean convention owner, convention manager,
9 anyone in some kind of a management position at a
10 convention. And -- and the type of convention I'm
11 referring to is anime or science-fiction related. Is
12 that clear?
13 A. Sounds a lot of different things, but, yes.
14 Q. Right. Well, if you need clarification, feel
15 free to ask.
16 A. Sure.
17 Q. Have you contacted any conventions about Vic
18 Mignogna?
19 A. There was a conversation between me and a
20 Kameha Con that had some parts about Vic.
21 Q. And I'm -- I'm not criticizing. It would be
22 best if you answered yes or no, and then let me ask you
23 which ones. It reads better on the transcript.
24 A. Cool.
25 MR. ERICK: So we need to do -- do the

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5 Q. Okay. Did she describe a sexual assault, of
6 any kind, by Vic Mignogna, on her?

7 A. She described him pulling his -- her hair
8 and --

9 Q. Fair enough.

10 A. -- forcibly whispering -- and then also
11 whispering in her ear, sexual stuff.

12 Q. When I say sexual assault, you -- any kind of
13 assault.

14 A. Okay. Perfect.

15 Q. That's fine.

16 I'm sorry. But, go ahead. Would you
17 describe what she told you.

18 A. Yeah. She said that he reached up behind the
19 back of her head, grabbed it, clinched his fist, pulled
20 her hair back, and then whispered in her ear, something
21 that she didn't exactly remember the exact words, but
22 whispered in her ear creepily and made her feel dirty.

23 Q. But she didn't tell you what those words were,
24 just that she was creeped --

25 A. That was creeped out --

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1 Q. -- she was creeped out by it?

2 A. Yeah.

3 Q. Okay.

4 A. I would be creeped out.

5 Q. And you believed her, I guess?

6 A. Oh, yes.

7 Q. But you weren't there? You didn't see it
8 happen?

9 A. Correct. I wasn't there.

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related to Funimation -- and

13 I'm gonna -- I'll describe that in a second -- ever tell

14 you it was okay to disclose that they had conducted an

15 investigation?

16 And before you answer, when I say everyone

17 related to Funimation, I mean anyone employed by Funima

18 -- that you know was employed, either past, present,

19 contractor or W-2 employee, anyone in management, and

20 for purposes of this discussion, we'll include

21 Christopher Sabat.

22 So did any of that group of people ever

23 tell you it was okay to disclose that they conducted an

24 investigation?

25 MR. VOLNEY: Objection, form.

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1 Q. (BY MR. BEARD) Answer.

2 A. I never had a conversation about that.

3 Q. Did you have a conversation with anyone at

4 Funimation who was in management?

5 A. No, not that I can think of.

6 Q. And forgive me if I reask questions I've

7 already asked, but we broke for lunch and I want to make

8 sure I get it down.

9 Okay. If you would, take a look at

10 Exhibit 28 and flip to page 13.

11 A. Yes.

12 Q. Would you read the text of that tweet. You can

13 omit the header --

14 A. Sure.

15 Q. -- information.

16 A. It says, or it reads: I know you have to be

17 able to add these clues up. Fifteen years of the same

18 story over and over. People posting their stories.

19 Maybe, just maybe, there might be some truth to it, and

20 if there is, you're backing a predator. Does this sound

21 familiar? Take your time. I can wait. GIF.

22 Q. Who are you talking about in that tweet?

23 A. Vic Mignogna.

24 Q. Don't want to put words in your mouth, but is

25 it a fair reading of that sentence that you're calling

123

1 him a predator?

2 MR. ERICK: Objection, form.

3 A. Yes.

4 Q. (BY MR. BEARD) When you say predator, what --

5 what do you think of, yourself, as a predator?

6 A. Sure. What I think of as a predator is anyone

7 or anything that's in a position that -- or has ability

8 to identify, isolate, and take advantage of that

9 isolation or weakness in another being, thing, item, and

10 seeks to do some level of harm, or control, manipulate.

11 Q. So a sexual predator, as people generally

12 understand that term, would be a predator by your

13 definition?

14 MR. ERICK: Objection, form.

15 Q. (BY MR. BEARD) Correct?

16 MR. ERICK: Objection, form.

17 A. That would be an example, yeah.

18 Q. (BY MR. BEARD) Yeah. It's not necessarily the

19 only example --

20 A. Right.

21 Q. -- I'm just saying --

22 A. That would be one, yeah.

23 Q. Yeah. That -- that -- that predator includes

24 sexual predator; is that a fair statement?

25 A. Yes.

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1 Q. Okay. Okay. Let's flip to page 20. Would

2 you -- when I ask you to read the tweet, unless I tell

3 you otherwise, just read the text. You don't have to

4 read the header. And I mean read it out loud. I'm

5 sorry.

6 A. Bye -- I don't know what that is. It's some

7 kind of thing.

8 Q. An icon?

9 A. Yeah, some kind of icon.

10 Q. An emoticon perhaps?

11 A. Yeah.

12 Have fun with the predator. Can't wait for

13 your -- for you apology.

14 Obviously spelling mistake, or grammar.

15 I will unblock you when it comes out just

16 to see that. Emoticon.

17 Q. Is this a reply?

18 A. I don't know. It's missing some data.

19 Q. Take a look at the header and -- and see if

20 that clears it up.

21 A. It says, rontoye@rontoye, February 2. And it

22 says, replying to canvaspirate and rialisms.

23 Q. Okay. Do you -- so is canvaspirate a tweet --

24 a Twitter handle?

25 A. It looks like it.

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1 Q. Okay. Do you know who that might be?

2 A. Not really, no.

3 Q. Okay. rialisms is Monica Rial's Twitter

4 handle, isn't it?

5 A. Correct.

6 Q. Okay. All right. So this is posted as a

7 reply, apparently?

8 A. Correct. Looks like it, yes.

9 Q. Okay. Do you remember what the context was?

10 A. No.

11 Q. Okay. But you're telling someone, Bye. Have

12 fun with the predator. Can't wait for you -- your, I

13 assume --

14 A. It was --

15 Q. -- apology?

16 A. -- supposed to be your, it looks like.

17 Q. And who are you talking about?

18 A. Looks like on this one -- I'm not sure on this,

19 but -- I'm not sure. I don't know who or what was the

20 previous conversation so it could be anybody.

21 Q. If you were a betting man, who would you say

22 you were talking about?

23 MR. ERICK: Objection, form.

24 A. I don't know.

25 Q. (BY MR. BEARD) Okay. Go to page 22, please.

126

1 A. Sure. Okay.

2 Q. Same thing. Please read the text.

3 A. If only one says it, but there are 10, 20,

4 30-plus people saying the same thing over the past

5 15-plus years, even if 10 to 20 percent are false, that

6 would mean no less than 8 are true. If only eight

7 assaults, is that enough to judge a person as a

8 predator?

9 Q. Is that last question rhetorical?

10 MR. ERICK: Objection to the form.

11 MR. BEARD: What's the form --

12 A. It seems like it.

13 MR. BEARD: -- objection?

14 MR. ERICK: I just -- I guess I don't

15 understand.

16 THE WITNESS: Yeah, I don't understand, in

17 a sense, it --

18 Q. (BY MR. BEARD) Do you know what rhetorical

19 means, Mr. Toye?

20 A. Yeah, abso -- yes, I do, but I'm --

21 Q. Okay.

22 A. Yeah.

23 Q. In other words, are you asking that question

24 sarcastically to say he is a predator?

25 A. I'm not sure. I don't know the -- it shows

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1 that I'm replying to somebody, so I don't know exactly

2 who I'm talking about, what I'm talking about to the

3 previous tweet. It's not provided.

4 Q. Would it be a fair inference from that sentence

5 -- from that sentence that you're calling Vic Mignogna a

6 predator?

7 MR. ERICK: Objection, form.

8 Q. (BY MR. BEARD) In your opinion.

9 MR. ERICK: Objection, form.

10 A. I'm not sure, based on this.

11 Q. (BY MR. BEARD) Right.

12 A. But when I say predator, and I'm speaking of

13 Vic, it's because of my understanding of what he did to

14 Monica Rial, XXXXX and XXXX XXXX, XXXX XXXXXXXXXXX, Jamie

15 Marchi, and then the research I've seen online, and the

16 hundreds and hundreds of things I've seen. So in my

17 opinion --

18 Q. We'll get into that later.

19 A. -- he's a predator.

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1 that I'm replying to somebody, so I don't know exactly

2 who I'm talking about, what I'm talking about to the

3 previous tweet. It's not provided.

4 Q. Would it be a fair inference from that sentence

5 -- from that sentence that you're calling Vic Mignogna a

6 predator?

7 MR. ERICK: Objection, form.

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10 A. I'm not sure, based on this.

11 Q. (BY MR. BEARD) Right.

12 A. But when I say predator, and I'm speaking of

13 Vic, it's because of my understanding of what he did to

14 Monica Rial, XXXXX and XXXX XXXX, XXXX XXXXXXXXXXX, Jamie

15 Marchi, and then the research I've seen online, and the

16 hundreds and hundreds of things I've seen. So in my

17 opinion --

18 Q. We'll get into that later.

19 A. -- he's a predator.

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15 Q. (BY MR. BEARD) If 10 people say he's a
16 predator, and we're using your definition of predator in
17 this question, do you think that that is sufficient
18 evidence to conclude that he is a predator?
19 MR. ERICK: Objection, form.
20 A. I don't know what other people can conclude. I
21 just know my opinion.
22 Q. (BY MR. BEARD) I'm asking your opinion.
23 A. In my opinion?
24 Q. Yes.
25 A. If they had a fiancée like I do that was

130

1 assaulted by Vic Mignogna, two very close friends, XXXXX
2 and XXXX XXXX, who were assaulted by Vic Mignogna, their
3 friend, XXXX XXXXXXXXXXXX, who was assaulted by Vic
4 Mignogna --
5 MR. BEARD: Objection, nonresponsive,
6 everything --
7 A. -- Jami Marchi, who was assaulted by Vic
8 Mignogna --
9 MR. ERICK: Everyone needs to let everybody
10 finish, so --
11 A. Jamie Marchi, assaulted by Vic Mignogna --
12 MR. BEARD: Not at the cost of --
13 A. -- and then looking online and seeing hundreds
14 and hundreds of women saying their story, videos, his
15 own personal testimony saying he messed up, yes, it's
16 fair to say that's a predator.
17 Q. (BY MR. BEARD) Okay. Would you do me the
18 courtesy --
19 A. Sure.
20 Q. -- of answering the question I'm about to ask,
21 and not the question that you want to answer apparently.
22 A. Okay.
23 Q. If 10 people say Vic Mignogna is a predator,
24 and they furnish no other evidence other than they say
25 it, do you think Vic Mignogna should be considered a

131

1 predator?
2 MR. ERICK: Objection, form. Objection,
3 sidebar.
4 Q. (BY MR. BEARD) Answer the question.
5 A. It's not for me to decide.
6 Q. I'm asking you if you personally think Vic
7 Mignogna is a predator --
8 MR. ERICK: Objection --
9 Q. (BY MR. BEARD) -- in those fac -- with those
10 facts?
11 MR. ERICK: Sorry. Objection, form.
12 A. I stated my opinion about Vic as a predator,
13 and I believe he is, based on evidence.
14 MR. BEARD: Objection, nonresponsive. Let
15 me try again.
16 Q. (BY MR. BEARD) How many people should accuse
17 someone of being a predator, or let's just say
18 predator -- should accuse someone of being a predator
19 and that be sufficient, in your opinion, to establish
20 their guilt?
21 MR. ERICK: Objection, form.
22 A. I don't know.
23 Q. (BY MR. BEARD) You don't know?
24 A. Huh-uh.
25 MR. ERICK: Objection, form.

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1 THE WITNESS: Sorry.
2 Q. (BY MR. BEARD) In the case of Mr. Mignogna, is
3 it one?
4 MR. ERICK: Objection, form.
5 Q. (BY MR. BEARD) Would one person accusing him
6 of being a predator be sufficient to convince you of his
7 guilt?
8 MR. ERICK: Objection, form.
9 A. I don't know.
10 Q. (BY MR. BEARD) Well, I mean, throughout all
11 these 342 tweets you seem to be calling him a predator
12 over and over; is that fair to say that?
13 MR. ERICK: Objection -- wait. Objection,
14 form.
15 A. I believe based on what I know from Monica
16 Rial, XXXX XXXX --
17 MR. BEARD: Objection, nonresponsive.
18 A. -- XXXX XXXX, XXXX XXXXXXXXXXXX --
19 MR. BEARD: We've heard this before.
20 MR. ERICK: Hold on. Hold on.
21 MR. BEARD: We've heard this before.
22 MR. ERICK: He gets -- Ty, he gets to
23 finish the answer. I know --
24 MR. BEARD: He doesn't get to filibuster my
25 time, Casey.

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1 MR. ERICK: He's not filibustering
2 anything. He's answering the question.
3 MR. BEARD: No, he's not. He's repeating
4 the same --
5 MR. ERICK: You're not even letting me
6 finish my --
7 MR. BEARD: I understand, but --
8 MR. ERICK: Okay. This isn't going to go
9 well if we keep interrupting each other. So even though
10 you don't like it, you may not like the answer, he gets
11 to finish, you get to say what you want to say about it.
12 There it is.
13 MR. BEARD: All right.
14 MR. ERICK: All right.
15 MR. BEARD: I'm going to ask one more time,
16 and I will absolutely shut this down and we'll go visit
17 with the judge. You're being nonresponsive -- your
18 client is being nonresponsive, excuse me. I don't like
19 to talk to somebody's client.
20 MR. ERICK: Okay.
21 MR. BEARD: And all I'm asking is that your
22 client answer the question I ask --
23 MR. ERICK: Yes.
24 MR. BEARD: -- and not run the clock out.
25 It's not going to work anyway. We got three and a half

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1 hours, so --
2 MR. ERICK: All right. I don't want to
3 argue about it anymore, but go ahead.
4 MR. BEARD: Let's take a break.
5 MR. ERICK: Okay.
6 MR. BEARD: I need five minutes.
7 THE VIDEOGRAPHER: We're going off the
8 record at 1:50.
9 (Break taken from 1:51 p.m. to 1:59 p.m.)
10 THE VIDEOGRAPHER: And we're back on the
11 record for the beginning of disc number 4. The time is
12 1:59.
13 Q. (BY MR. BEARD) Mr. Toye, if Vic Mignogna were
14 indeed guilty of the things that you pretty clearly
15 believe him to be guilty of, what do you think would be
16 an appropriate punishment?
17 MR. ERICK: Objection, form.
18 A. I'm not sure. I'm not a cop or a lawyer.
19 Q. (BY MR. BEARD) Well, no, I'm asking just your
20 opinion. I mean, what do you think -- what penalty do
21 you think someone should pay for that?
22 MR. ERICK: Objection, form.
23 A. For what he did to Monica Rial?
24 Q. (BY MR. BEARD) If it were true.
25 A. And XXXXX and XXXX?

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1 Q. If it were true.
2 MR. ERICK: Objection, form.
3 A. I'm not -- I'm not sure.
4 Q. (BY MR. BEARD) Should he never be able to work
5 again --
6 MR. ERICK: Objection.
7 Q. (BY MR. BEARD) -- in -- in the anime field?
8 MR. ERICK: Objection, form.
9 A. I'm not sure.
10 Q. (BY MR. BEARD) Okay. Look at page 23, please,
11 of Exhibit 28. Would you read the text of that tweet.
12 A. Sure.
13 Don't give up on him regardless of what
14 comes out. That is not the intention of anyone. What
15 most want is the truth to come out, an apology, healing,
16 and safety for ladies at conventions until he gets help
17 and proves himself to not be a predator. He needs help.
18 Q. How can someone prove themselves to not be a
19 predator?
20 A. I'm not sure.
21 Q. So then this tweet -- you put a condition in
22 this tweet that you can't explain; is that correct?
23 MR. ERICK: Objection, form.
24 A. What was your question?
25 Q. (BY MR. BEARD) How would he prove himself to

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1 not be a predator? What would he have to do?
2 MR. ERICK: Objection, form.
3 A. I'm not sure.
4 Q. (BY MR. BEARD) Okay. So basically, then, you
5 weren't real serious about this tweet, then; is that
6 correct?
7 MR. ERICK: Objection, form.
8 A. I'm not the person that he hurt, so I feel like
9 -- or a person that is a predator hurt, so I would say
10 that would be up to the person he or she, the predator,
11 made the offense to, so whatever that would look like.
12 Q. (BY MR. BEARD) Okay. To be fair, so you're
13 saying that if the victims were satisfied, you would be
14 satisfied?
15 MR. ERICK: Objection, form.
16 Q. (BY MR. BEARD) I mean, I'm not trying --
17 A. Sure.
18 Q. -- to put words in your mouth, I'm just --
19 A. No, that sounds --
20 Q. Is that fair?
21 A. That sounds fair.
22 Q. Okay. Okay. What if some victims are
23 satisfied, but others aren't, is he still a predator?
24 MR. ERICK: Objection, form.
25 A. If some victims are satisfied, is he still a

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1 predator? I feel like if he did the acts, that would be
2 predatorial behavior. He's forgiven by some and not by
3 others, but it's not for me to make the determination
4 for that. But, in my opinion, he would still be a
5 predator.

6 Q. (BY MR. BEARD) But to be fair --

7 A. Right.

8 Q. -- and throughout these tweets you've called
9 him a predator, right?

10 A. Right, because in my opinion, I believe him to
11 be a predator.

12 Q. I understand why you did it. I'm just simply
13 confirming that --

14 A. Yes.

15 Q. -- you called him a predator.

16 A. Correct.

17 Q. Many times?

18 A. Yes.

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	<p>1 A. I was really angry after I found out that he 2 assaulted my fiancée, yes.</p> <p>3 Q. Furious?</p> <p>4 A. Pretty furious, yes.</p> <p>5 Q. Is that fair?</p> <p>6 A. Yeah.</p> <p>7 Q. A lot of malice in your heart to him; is that 8 fair?</p> <p>9 MR. ERICK: Objection, form.</p> <p>10 A. No.</p> <p>11 Q. (BY MR. BEARD) Help me with this. You just 12 agreed you were furious at him, but there's no malice?</p> <p>13 MR. ERICK: Objection, form.</p> <p>14 A. No.</p> <p>15 Q. (BY MR. BEARD) Okay. Just to be clear, you 16 can be furious with anger at someone, and that's not -- 17 and that's not malice?</p> <p>18 MR. ERICK: Objection, form.</p> <p>19 Q. (BY MR. BEARD) It's not malicious even?</p> <p>20 MR. ERICK: Objection, form.</p> <p>21 A. In my opinion, there -- there is -- there are 22 times when that is correct.</p> <p>23 Q. (BY MR. BEARD) Was that correct in late 24 January of 2019?</p> <p>25 MR. ERICK: Objection, form.</p>
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	<p>1 A. That I didn't have malice towards Vic? That's 2 correct.</p> <p>3 Q. No malice?</p> <p>4 A. None.</p>
<p>18 Q. Okay. Were you angry at Vic in early February?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Were you angry at him in, say, 21 late Jan -- that's not -- yeah. Around January 23rd of 22 2019, were you angry with Vic?</p> <p>23 MR. ERICK: Objection, form.</p> <p>24 A. Yes.</p> <p>25 Q. (BY MR. BEARD) How angry?</p>	

DEPOSITION OF RONALD TOYE
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25 Q. Are you familiar with an article that was

164

1 titled Fixing the Staircase: Victor Mignogna's Sexual
2 Assault Allegations and the Voice Actors Who Speak Out?

3 A. Sounds familiar, but I'm not sure.

4 Q. Do you recall reading such an article?

5 A. I'm not 100 percent sure, but it sounds
6 familiar.

7 Q. Did you talk to anybody associated with this
8 article, i.e., someone that might be writing it or
9 something?

10 A. I am not sure. I don't know.

11 Q. Do you know if Monica Rial contacted them in
12 any way?

13 A. I don't know.

14 Q. Well, do you know or not? I'm just -- is that
15 a no?

16 A. No. That would be a no.

17 Q. All right. So as far as you know, you had no
18 involvement in the article, Fixing the Staircase: Vic
19 Mignogna's Sexual Assault Allegations and the Voice
20 Actors Who Speak Out?

21 A. I don't know. I'm not sure.

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21 Q. Okay. Tell me about the sexual assault that
22 you believe occurred by Vic Mignogna on Monica Rial.

23 A. Tell me about it?

24 Q. Tell me what she told you happened.

25 A. She told me that he invited her up to his room,

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1 wanted to show her something. She went up there. He,
2 then, grabbed her, kissed her, threw her on the bed.
3 And then -- I think a guy's name was Stan, came and
4 knocked on the door and saved her.

5 Q. Okay.

6 A. He pinned her down.

7 Q. Is that the only incident she ever told you
8 about involving Vic Mignogna and what you would
9 characterize as assault?

10 A. She has mentioned that he's pulled her hair,
11 similar to Jamie, before.

12 Q. Okay. Anything else?

13 A. Getting close -- too close to her,
14 inappropriate kind of hugging. But that's -- yeah.
15 Just frequent hair pulling.

16 Q. Was there ever an incident involving a jelly
17 bean that was thought to be an assault?

18 A. The first time I heard of that story was a guy
19 on YouTube -- Face -- Twitter, named Nick Rekieta
20 brought that up, so that's the first I heard of it.
21 But, yeah, then she told me that happened.

22 Q. You referred to the Funimation investigation
23 numerous times on Twitter, didn't you?

24 A. I'm not sure.

25 Q. Okay. Did you ever -- did you ever make any

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1 statements about what specifically was being
2 investigated, i.e., who was being investigated and what
3 they purportedly did?

4 A. I'm not 100 percent sure.

5 Q. Okay. Go to page 179 of Exhibit 28, please.

6 A. Sure.

7 Q. Read the text of that tweet, please.

8 A. She didn't hide behind it. That's why he is
9 fired from every major studio. She presented, and now
10 he is gone. That can't share all the details. Fans are
11 upset. I get it. But being rude is not the play here.

12 Q. Who are you talking about in this tweet?

13 A. I'm not sure.

14 Q. Was it Vic Mignogna?

15 A. Could be.

16 Q. What kind of studios is this referring to?

17 A. I'm not sure. Depending on who it was, certain
18 time periods throughout this you can see that I've
19 talked about Bill Cosby, who is also an actor, who's
20 been fired; Harvey Weinstein, who is involved in the
21 entertainment industry, who's lost a lot of respect. So
22 I'm not sure.

23 Q. Do you know who tonyshadmoon is?

24 A. Not that I can think of.

25 Q. @tonyshadmoon or @deku_a?

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1 A. Not that I can think of. Again, in that time
2 period I was receiving more tweets per day than Clint
3 Eastwood, Joe Pesci, and a couple of other actors I
4 looked up. It was -- I was under assault and
5 harassment, so I don't know who most of these people
6 that were attacking and harassing me were.

7 Q. So this could be about Bill Cosby?

8 A. Very possible.

9 Q. Okay. If you would, take a look at page 1.

10 A. Page 1?

11 Q. Yep. I've represented to you that these are
12 tweets.

13 A. Uh-huh.

14 Q. What's the date on that tweet?

15 A. January 23rd.

16 Q. Okay. Look at page 342.

17 A. Yes.

18 Q. Okay. Assuming that you actually sent all
19 these tweets, would you agree with the statement that
20 between January -- January 23rd and April 4th, you sent
21 approximately 342 tweets regarding Vic Mignogna?

22 MR. ERICK: Objection, form.

23 A. I'm not sure.

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	<p>13 Q. Have you personally witnessed a single assault, 14 as you define that term, by Vic Mignogna, against 15 anyone?</p> <p>16 A. I've seen him hug inappropriately, fans at 17 conventions, yes.</p> <p>18 Q. Tell me about one of those incidents, please.</p> <p>19 A. Sure. Grabbing a fan and wrapping his legs 20 around her and hugging her.</p> <p>21 Q. Wrapping his legs around her?</p> <p>22 A. Yes. Like full-on body hug.</p> <p>23 Q. Okay. Where was this?</p> <p>24 A. It may be at Florida Supercon. I think that 25 was where it was at.</p>
186	188
	<p>1 Q. Was it in front of a bunch of fans?</p> <p>2 A. Yes. It was at his autograph line.</p> <p>3 Q. So he walked up and hugged a fan?</p> <p>4 A. No. She came up.</p> <p>5 Q. Okay. He hugged her?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And you thought that was inappropriate?</p> <p>8 A. The way he did it with the girl, not sure how 9 old she was, absolutely.</p> <p>10 Q. Did you ask her?</p> <p>11 A. No. Neither did he.</p>

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1 XXXX, XXXX XXXXXXXXXXXX, Jamie Marchi, those stories
2 resounded and corroborated the stories that they --
3 their testimony that they gave me, so it corroborated
4 it, so I believe them.

5 Q. So not to be pedantic, but you said they were
6 going to come forward.

7 Did you -- what did you mean by that?

8 A. Well, they have come forward. They posted
9 their stories of him.

10 Q. Oh, when you -- okay. So if I'm hearing you
11 correctly, when you said that they'll come forward, it
12 wasn't in this case, it was just they were going to come
13 out in public?

14 A. They have or could. It's hypothetical.

15 Q. Well, no, I mean, didn't you say --

16 A. And there have been.

17 Q. -- that hundreds of women would come out?

18 A. I don't know.

19 Q. You don't know.

20 MR. ERICK: Object, form.

21 Q. (BY MR. BEARD) Did you say thousands of women
22 were going to come forward and corroborate assaults --

23 MR. ERICK: Objection, form.

24 Q. (BY MR. BEARD) -- made by Vic Mignogna
25 against --

8 Q. Okay. You did say you had hundreds of women
9 who were going to come forward publicly, didn't you?

10 MR. ERICK: Object, form.

11 A. It -- there --

12 Q. (BY MR. BEARD) To -- to talk about Vic
13 Mignogna's purported sexual assault?

14 MR. ERICK: Objection, form.

15 A. Yeah, after doing my research online, looking
16 up different things, there have been way -- plenty, way
17 more than hundreds of women.

18 Q. (BY MR. BEARD) But did you talk to all of
19 these women?

20 A. No.

21 Q. How many of them did you talk to? Let me
22 rephrase that.

23 Did you communicate with any of them?

24 A. No. But based on my belief, and also
25 understanding of what happened to Monica, XXXXX and

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1 MR. ERICK: Sorry. Objection, form.

2 A. I don't remember if I said that, but I know
3 that after my research and what he's done to XXXXX and
4 XXXX, XXXX XXXXXXXXXXXX, Monica, Jamie Marchi, and then I
5 find out from more and more people throughout this case,
6 him admitting he's failed to ask consent at conventions
7 on multiple occasions, it's not hard to reasonably
8 deduce that thousands is not an unreasonable number.
9 There's mountains and mountains and mountains of
10 testimonies online of their personal accounts: I was
11 16, Vic creepily kissed me, put his hand up my dress.

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1 Q. Okay. What is it?
2 A. This is a -- what do we call this exhibit?
3 Q. It's got a number at the bottom, 25, I believe.
4 A. Oh, yeah. This is Exhibit 5. It reads
5 prettyuglylittleliar.net.
6 Q. Okay. I apologize. We didn't make extra
7 copies of this. We're going to have to bat this back
8 and forth.
9 THE REPORTER: I have it from yesterday.
10 MR. BEARD: Oh, do you? Oh, great. Sorry.
11 Would you hand him 25, please.
12 THE WITNESS: Thank you, ma'am.
13 Q. (BY MR. BEARD) All right. Let's look at --
14 A. Wow.

22 Q. Do you believe this allegation, this one on the
23 top of page 3?
24 A. Yes.
25 Q. Why?

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1 A. Because of after hearing what happened to
2 Monica Rial, XXXXX XXXX, XXXX XXXX, XXXX XXXXXXXXXXXX,
3 Jamie Marchi, and the girls that come up in convention
4 lines that mention it, online research, YouTube videos,
5 Vic's own testimony saying he's messed up, he needs
6 help, psychological help, it leads me to believe that
7 this person is being honest in that situation.
8 Q. But you don't know who this person is, right?
9 A. Nope, don't know them.
10 Q. If you don't know who she is, how do you know
11 she even exists?
12 A. I don't know. They have provided a ton of
13 links.
14 Q. Who are they?
15 A. Whoever that is.
16 Q. Whoever what is?
17 A. sharonbtwsharonB89188965, and michelemc73,
18 that's who she's replying to.

DEPOSITION OF RONALD TOYE

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<p style="text-align: right;">197</p>	<p style="text-align: right;">199</p> <p>1 people you were referring to earlier who were going to 2 come out and accuse Vic? 3 MR. ERICK: Object, form. 4 A. These would be examples of a very small 5 microcosm of what I've seen, but this represents -- I 6 mean, it looks like hundreds on this page. 7 Q. (BY MR. BEARD) I said some of them. 8 A. Yes. So this would be a very small microcosm 9 of the hundreds. 10 Q. What website was this taken from again? 11 A. Exhibit 25 reads prettyuglylittleliar.net. 12 Q. And tell me again what that is. 13 A. It's a website, a forum, I think. 14 Q. Have you accessed that forum? 15 A. I have seen this, yes. 16 Q. Did you -- did you pull these links? Did you 17 copy these links from the forum? 18 A. I looked at the links. I clicked on them, yes. 19 Q. No. Did you copy them and provide them to your 20 lawyer or someone else? 21 A. I think I sent them the hyperlink. 22 Q. Okay. Okay. Okay. What is a liar? 23 A. That's a broad statement. I don't know exactly 24 the definition. Somebody who -- 25 Q. You don't know the definition of the word liar?</p>
<p>25 Okay. Are these some of the hundreds of</p>	<p style="text-align: right;">200</p> <p>1 A. Somebody who is not telling the truth, the 2 whole truth, maybe withholding some evidence. I mean, 3 potential truth, potentially. 4 Q. So a website that includes, in its name, liar, 5 you find that credible when they attack Vic? 6 MR. ERICK: Objection, form. 7 A. Yes. 8 Q. (BY MR. BEARD) You find any account on that 9 website that says, Vic did something wrong to me, 10 credible even though it says liar? 11 A. Especially when you take into account -- 12 Q. Yes or no. 13 A. -- what happened to my personal fiancée -- 14 MR. BEARD: Objection, nonresponsive. 15 A. -- yes, without question I believe these 16 people.</p>

DEPOSITION OF RONALD TOYE
June 27, 2019

209	211 3 THE VIDEOGRAPHER: You have one minute. 4 MR. BEARD: We can stop. Off the record, 5 please. 6 THE VIDEOGRAPHER: We're going off the 7 record at 3:37. 8 (Break taken from 3:38 p.m. to 3:49 p.m.) 9 THE VIDEOGRAPHER: And we are back on the 10 record for the beginning of disc number 5. The time is 11 3:49. 12 MR. BEARD: Pass the witness. 13 MR. VOLNEY: I don't have any questions. 14 MR. JOHNSON: No questions at this time. 15 MR. ERICK: We'll reserve ours for trial. 16 Thank you. 17 THE VIDEOGRAPHER: And we're going off the 18 record at 3:49. 19 20 (Deposition concluded at 3:49 p.m.) 21 22 23 24 25
	212 1 CHANGES AND SIGNATURE 2 WITNESS NAME: RONALD TOYE DATE: JUNE 27, 2019 3 PAGE LINE CHANGE REASON 4 _____ 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____ 24 _____ 25 _____

DEPOSITION OF RONALD TOYE

June 27, 2019

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1 I, RONALD TOYE, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.
4
5 _____
6 RONALD TOYE
7 THE STATE OF _____)
8 COUNTY OF _____)
9
10 Before me, _____, on this day
11 personally appeared RONALD TOYE, known to me (or proved
12 to me under oath or through _____)
13 (description of identity card or other document) to be
14 the person whose name is subscribed to the foregoing
15 instrument and acknowledged to me that they executed the
16 same for the purposes and consideration therein
17 expressed.
18 Given under my hand and seal of office this
19 _____ day of _____, _____.
20
21 _____
22 NOTARY PUBLIC IN AND FOR
23 THE STATE OF _____
24 COMMISSION EXPIRES: _____
25

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1 NO. 141-307474-19
2 VICTOR MIGNOGNA,) IN THE DISTRICT COURT
3)
4 Plaintiff,)
5)
6 VS.) TARRANT COUNTY, TEXAS
7)
8)
9 FUNIMATION PRODUCTIONS,)
10 LLC, JAMIE MARCHI, MONICA)
11 RIAL, and RONALD TOYE,)
12)
13 Defendants.) 141st JUDICIAL DISTRICT
14
15 REPORTER'S CERTIFICATION
16 DEPOSITION OF RONALD TOYE
17 JUNE 27, 2019
18
19 I, Claudia White, Certified Shorthand Reporter in
20 and for the State of Texas, hereby certify to the
21 following:
22 That the witness, RONALD TOYE, was duly sworn by
23 the officer and that the transcript of the oral
24 deposition is a true record of the testimony given by
25 the witness;
26 That the deposition transcript was submitted on
27 _____ to the witness or to the attorney for the
28 witness for examination, signature and return to CSI
29 Global Deposition Services by _____;
30 That the amount of time used by each party at the
31 deposition is as follows:
32 Mr. Ty Beard, Esq. - 04 HOURS:00 MINUTE(S)
33 Mr. Casey S. Erick, Esq. - 00 HOURS:00 MINUTE(S)
34 Mr. John Volney, Esq. - 00 HOURS:00 MINUTE(S)
35 Mr. Sam Johnson, Esq. - 00 HOURS:00 MINUTE(S)
36 That pursuant to information given to the

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1 Deposition officer at the time said testimony was taken,
2 the following includes counsel for all parties of
3 record:
4 Mr. Ty Beard, Esq., and Ms. Carey-Elisa Christie,
5 Esq. Attorney for Plaintiff
6 Mr. Casey S. Erick, Esq., Attorney for Defendants
7 Monica Rial and Ronald Toye
8 Mr. John Volney, Esq., Attorney for Defendant
9 Funimation
10 Mr. Sam Johnson, Esq., Attorney for Defendant
11 Jamie Marchi
12 I further certify that I am neither counsel for,
13 related to, nor employed by any of the parties or
14 attorneys in the action in which this proceeding was
15 taken, and further that I am not financially or
16 otherwise interested in the outcome of the action.
17 Further certification requirements pursuant to Rule
18 203 of TRCP will be certified to after they have
19 occurred.
20 Certified to by me this 30th day of June, 2019.
21
22 _____
23 *Claudia White*
24 Claudia White, Texas CSR #8242
25 Expiration Date: 5/31/21
Firm Registration No. 526
CSI Global Deposition Services
4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsociences.com

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1 FURTHER CERTIFICATION UNDER RULE 203 TRCP
2 The original deposition was/was not returned to the
3 deposition officer on _____;
4 If returned, the attached Changes and Signature
5 page contains any changes and the reasons therefor;
6 If returned, the original deposition was delivered
7 to Mr. Ty Beard, Custodial Attorney;
8 That \$_____ is the deposition officer's
9 charges to the Plaintiff for preparing the original
10 deposition transcript and any copies of exhibits;
11 That the deposition was delivered in accordance
12 with Rule 203.3, and that a copy of this certificate was
13 served on all parties shown herein on and filed with the
14 Clerk.
15 Certified to by me this _____ day of
16 _____, 2019.
17
18 _____
19 *Claudia White*
20 Claudia White
21 Texas CSR #8242
22 Expiration Date: 5/31/21
23 Firm Registration No. 526
24 CSI Global Deposition Services
25 4950 N. O'Connor Road, Suite 152
Irving, Texas 75062
(877) 784-0004 fax (972) 650-0225
production@courtroomsociences.com

EXHIBIT P

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

V.

**FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI**

Defendants.

§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

141st JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

DECLARATION OF J. SEAN LEMOINE

1. I am a partner with the law firm of Wick Phillips Gould & Martin, LLP (“Wick Phillips”).

2. I am of sound mind, competent and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

3. I am an attorney at law duly admitted and licensed to practice before the courts of the State of Texas. I was so licensed in November 2000. My practice is based out of the DFW Metroplex, which includes Dallas County, Tarrant County, and Collin County, Texas (and has been so for my entire career). I represent Monica Rial and Ronald Toye (the above captioned Defendants) identified as the “Moving Defendants” in their Texas Anti-Slapp Motion to Dismiss (the “Motion”).

4. Attached to the deposition of Vic Mignogna as Exhibits 1-8, 11, 14, 16-17, 21, and 25 are true and correct copies of articles and/or tweets that I pulled from the internet. Also attached thereto as Ex. 26 are screenshots of a conversation with Plaintiff on January 19, 2019, as captured on <https://www.facebook.com/pg/RisemboolRangers/photos/>. Page 1 of 26 is a demonstrative that I created.

5. As an unfortunate result of this lawsuit, I have come to learn of an individual named Nick Rekieta (“Rekieta”), who is a lawyer licensed to practice in the State of Minnesota for about four years. Attached hereto as Exhibit 1 are true and correct copies of Rekieta’s civil and criminal case list, which are publicly available.

6. As described in the Motion, Rekieta has inserted himself into this litigation, and is a fact witness based on his own actions, including setting up and promoting the “GFM War Chest” (defined in the Motion).

7. On May 31, 2019, Rekieta conducted a YouTube show located online at <https://www.youtube.com/watch?v=tdLIPOqHNKE> that discussed a hearing before the Honorable John Chupp (presiding judge in this matter) regarding confidentiality concerns of depositions and witnesses. During the show Rekieta made the implicit threat that the identity of any potential witness against Plaintiff Vic Mignogna became available their personal information would be exposed on the internet, and that Rekieta would view it as a real “**shame**” if the witness’s employers were somehow contacted.

8. The following is a rough transcription of Rekieta’s comments, starting around the 17:00 minute mark:

“Hey Pretty Ugly Little Liars. I know you’re watching even though you’re never ever understanding. But, just in case you don’t realize what that means. Is that if any of your identities are discerned by the court...it might not even be me. It might be Casey leaking them to Shane that makes them public. That would be a real shame. That would be a real shame. If uh like your workplace, like let’s say there was someone who emailed a convention or a signing event or something, and it was easy to ascertain where they worked. Like imagine what happens when that person who goes out and lies about someone to get their job ruined, that person’s email and workplace gets exposed to the internet. I just...it’s the weirdest thing on earth that they would ask for this.”

9. On July 4, 2019, Rekieta did another live-stream on his YouTube channel, found online at <https://www.youtube.com/watch?v=EIDKxTZM6L4>. In the July 4 video, Rekieta

actively promoted (starting around the 44:00 minute mark) obtaining additional funding for the Plaintiff through the GFM War Chest to “make [Moving Defendants] mad.”

10. Around the 46:00 minute mark, one of his anonymous guests (“yellowflash”) commented that he would like for Rekieta to raise enough money to sue (and apparently put a lien on the car of) a woman that goes by “Mars girl.” The following is a rough transcription of the comment:

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

11. Rekieta did immediately disclaim that he cannot guarantee that the GFM War Chest will be used to sue a specific person or publication.

12. On July 9, 2019, Rekieta explained his motive behind the GFM War Chest:

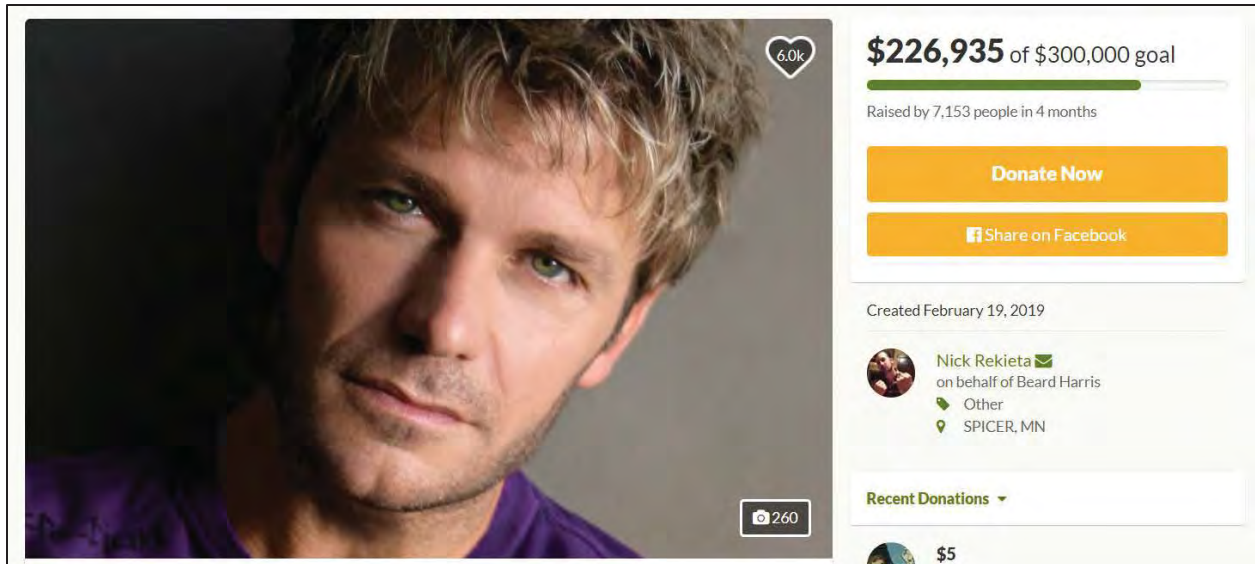
There are hundreds of hours of video of my motives for contributing to the GoFundMe War Chest, the er of, of creating it, not contributing to it. The biggest one is I just don’t like any of the defendants and I think they’re terrible people, and I want to see them ground into dust. Because when you lie to take away a man’s livelihood you deserve to be ground into dust. You are scum and you know it. That’s why I created it.

50:30 mark <https://www.youtube.com/watch?v=aaazoGTvqZU>

13. As of July 17, 2019, the GFM War Chest is at \$226,935 with 7,153 people donating.

Below is a screenshot (taken July 17, 2019) of the top half of the weblink for

<https://www.gofundme.com/vic-kicks-back>



14. On July 11, 2019, Rekieta began playing video clips from the deposition of Ron Toye.

15. On July 12, 2019, Rekieta began playing video clips from the deposition of Vic Mignogna.

16. On July 15, 2019, Rekieta began playing video clips from the deposition of Monica Rial.

17. Presumably, someone representing Plaintiff, i.e. his attorneys, provided the depositions to Rekieta.

18. Attached hereto as Exhibits 2-8 are true and correct copies of documents and websites I accessed on the internet (with following hyperlinks) on the date identified within the document:

- Ex. 2 – Mignogna’s Professional Resume accessible through his personal website
 - <http://www.vicsworld.net/docs/professionalresume.doc>
- Ex. 3 – The “Voice” section from Mignogna’s personal website
 - <https://www.vicsworld.net/voice.html>
- Ex. 4 - The “Music” section from Mignogna’s personal website
 - <https://www.vicsworld.net/music.html>

- Ex. 5 – The Homepage for Mignogna’s show titled “Star Trek Continues”
 - <https://www.startrekcontinues.com>
- Ex. 6 – Mignogna’s profile in the Internet Movie Database
 - <https://www.imdb.com/name/nm0586003>
- Ex. 7 – The LiveJournal weblog managed by Mignogna’s mother, Barb Myers
 - <https://b-k-myers.livejournal.com>
- Ex. 8 – April 19, 2019 article titled “Accused of Sexual Harassment, Vic Mignogna Sues Funimation”
 - <https://variety.com/2019/gaming/news/vic-mignogna-sues-funimation-1203193225/>

19. I personally typed in the addresses for the websites depicted in Exhibits 2-8, and printed out a copy of the relevant information, which is fairly and accurately represented by the exhibits being offered into evidence.

20. I accessed the websites depicted in Exhibits 2-8, and printed out the documents on between July 12 and July 17, 2019. The exhibits were all publicly available and could be accessed by anyone.

21. The information contained in Exhibits 2-8 is attributable to the owners and operators of the websites depicted.

22. My name is J. Sean Lemoine. My date of birth is December 27, 1972, and my office address is 3131 McKinney Avenue, Dallas, Texas 75204. I declare under penalty of perjury that the foregoing is true and correct, and within my personal knowledge.

Executed on July 18, 2019.



J. Sean Lemoine

**JSL DEC.
EXHIBIT 1**

Civil, Family & Probate Case Records Search Results

[Skip to Main Content](#) [Logout My Account](#) [Search Menu](#) [New Civil Search](#) [Refine Search](#)

Location : All MNCIS Sites - Case Search [Help](#)

Record Count: 12

Search By: Attorney **Exact Name:** on **Party Search Mode:** Name **Last Name:** Rekieta **First Name:** Nicholas **All All** **Sort By:** Filed Date

Case Number	Style	Filed/Location/Judicial Officer	Type/Status
34-CV-07-241	ABL Financial LLC as successor in interest to Associates Financial Services, Inc. vs Joe I. Garcia, Jr.	05/17/2007 Kandiyohi	Default Judgment Closed-Physical File Destroyed
10-FA-15-280	County Of Carver, Nicole Dawn Latham vs. Sovath Kim	07/16/2015 Carver	Support Closed
10-FA-16-24	In Re the Custody of ESK, Sovath Kim, Petitioner and Nicole Dawn Latham, Respondent	01/22/2016 Carver	Custody Closed
34-PR-16-54	In re the Estate of Mary Gayle Angier, Deceased	06/22/2016 Kandiyohi	Formal Unsupervised Closed
34-CV-17-120	Kathleen Mitchell vs Todd A. Walter	03/13/2017 Kandiyohi Fischer, Jennifer	Civil Other/Misc. Closed
62-HG-CV-17-1770	Kari Margaret Petersen vs Michael Rubbelke, Mark Leigh	08/08/2017 Ramsey Housing Conciliation	Civil Other/Misc. Closed
34-CO-17-146	Sunnyside Property Owners Assn Inc vs Krissy Weiss	10/11/2017 Kandiyohi	Conciliation Closed
34-CO-17-177	Dennis Kirby Nazarene vs Multiple Firearms and Ammunition	12/24/2017 Kandiyohi	Conciliation - Forfeiture Closed
34-CV-18-120	Sunnyside Property Owners Assn Inc vs Krissy Weiss	02/22/2018 Kandiyohi Knutsen, Dwayne	Civil Other/Misc. Closed
34-FA-18-178	Meghan Samantha Reineke, Petitioner and Michael Jacob Bigalke	07/19/2018 Kandiyohi	Custody Closed
34-CV-18-408	Rouse Motor Co., Inc. vs Quinton J Duruji, Davina M Duruji	08/03/2018 Kandiyohi Hanson, Rodney	Contract Open
76-CV-18-434	Violet Loen vs State Bank of Danvers	08/17/2018 Swift Hanson, Rodney	Civil Other/Misc. Open

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Case Number	Citation Number	Defendant Info	Filed/Location/Judicial Officer	Type/Status	Charge(s)	Disposition/Level of Sentence
34-CR-15-1101		Schroeder, Cloe Danielle 12/20/1993	12/15/2015 Kandiyohi Spilseth, Donald M. ,	Crim/Traf Mandatory Closed	Receiving Stolen Property	Convicted Convicted of a Misdemeanor
34-CR-16-98	340037603108	Swenson, Kyle Greg 12/20/1982	02/01/2016 Kandiyohi	Crim/Traf Mandatory Closed	Disorderly Conduct- Brawling or Fighting	Dismissed, Conditions Met or Expired
34-CR-16-445		WHARTON, JERAMY JOHN 10/19/1977	05/26/2016 Kandiyohi Spilseth, Donald M. ,	Crim/Traf Mandatory Under Court Jurisdiction	Criminal Sexual Conduct in the First Degree (Not applicable - GOC)	Convicted Convicted of a Felony
34-CR-16-686	340015621901	Valdovinos, Delores Mae 12/17/1979	08/08/2016 Kandiyohi Fischer, Jennifer	Crim/Traf Mandatory Closed	Domestic Assault- Misdemeanor- Intentionally Inflicts/Attempts to Inflict Bodily Harm on Anothe	Dismissed, Conditions Met or Expired
76-CR-16-372		MICHALETZ, NICHOLAS GORDON 06/21/1990	08/09/2016 Swift Mennis, David L.	Crim/Traf Mandatory Closed	Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana (Not applicable - GOC)	Dismissed
34-CR-17-68		Nordrum, Amber Nicole 07/30/1992	01/25/2017 Kandiyohi Thompson, Michael J.	Crim/Traf Mandatory Closed	2nd Degree Assault - Fear (Not applicable - GOC) Domestic Assault (Not applicable - GOC)	Dismissed Convicted Convicted of a Misdemeanor Dismissed
76-CR-17-53		AUSPOS, TYLER GRAYSON 09/16/1986	01/26/2017 Swift	Crim/Traf Mandatory Closed	Domestic Assault - Intentionally Inflicts/Attempts to Inflict Bodily Harm on Another (Not applicable - GOC)	Dismissed
76-CR-17-89		AUSPOS, TYLER GRAYSON 09/16/1986	02/27/2017 Swift	Crim/Traf Mandatory Closed	Domestic Abuse - Violation of Order for Protection - Misdemeanor (Not applicable - GOC)	Convicted Convicted of a Misdemeanor
34-CR-17-224	340107706901 340107706901	Musel, Erik Allyn 05/27/1983	03/13/2017 Kandiyohi	Crim/Traf Mandatory Closed	Domestic Assault- Misdemeanor- Intentionally Inflicts/Attempts to Inflict Bodily Harm on Anothe DISORDERLY CONDUCT	Dismissed, Conditions Met or Expired Dismissed, Conditions Met or Expired
34-CR-17-1213		Nazareus, Dennis Kirby 02/25/1987	12/19/2017 Kandiyohi Wentzell, Stephen J.	Crim/Traf Mandatory Under Court Jurisdiction	Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana (Not applicable - GOC) Possess Ammo/Any Firearm - User of Controlled Substance (Not applicable - GOC)	Dismissed Stay of adjudication
34-CR-18-13		Nazareus, Dillon Wolfgang 03/13/1995	01/04/2018 Kandiyohi Wentzell, Stephen J.	Crim/Traf Mandatory Closed	Possess Ammo/Any Firearm - User of Controlled Substance (Not applicable - GOC)	Dismissed
34-CR-18-14		Dickson, Autumn Anna 08/01/1986	01/04/2018 Kandiyohi Wentzell, Stephen J.	Crim/Traf Mandatory Under Court Jurisdiction	Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana (Not applicable - GOC) Possess Ammo/Any Firearm - User of Controlled Substance (Not applicable - GOC)	Dismissed Stay of adjudication
29-CR-18-1195		SMITH, NICHOLAS JOSEPH 02/02/1993	10/01/2018 Hubbard Tiffany, Robert D.	Crim/Traf Mandatory Closed	Harassment; Restraining Order - Violate w/in 10 yrs of 1st of 2 prev dom violence convictions/adjud (Not applicable - GOC)	Dismissed

**JSL DEC.
EXHIBIT 2**

VIC MIGNOGNA
7810 Pickford Knolls CT
Houston, Texas 77041
Email: Victhewop@aol.com

A professional writer/producer/director with a proven track record in production, including broadcast and industrial production, original music score production, radio & TV audio/video production, and documentary production. A skilled communicator with demonstrated ability to work effectively with diverse individuals at all levels of an organization. Possesses extensive experience in all aspects of production and production management to accomplish maximum productivity and creativity.

WORK HISTORY:

- 2001-Present REEL ADVENTURES, Houston, Texas.** *Vice-President & Co-owner.* Independent full-time creative director responsible for original music, sound design & video production of both broadcast and non-broadcast productions. Acts in various production roles as needed, including writing, directing, composing, arranging, shooting, and producing projects on a local, regional, national, and international level. Takes productions from concept to completion.
- 2001-Present STAGE DIRECTIONS, Houston, Texas.** A full-service audio, video, and staging facility. *Producer/Composer/Arranger/Editor.* Reports directly to the owner of the company. Responsible for sound design and video editing of broadcast and industrial productions. Handles various aspects of production as the need arises, such as director, editor, camera operator, etc.
- 1992-1994 SOUNDWORKS, Houston, Texas.** A full-service audio and audio-for-broadcast facility. *Staff Composer/Arranger/Producer.* Reported directly to the owner of the company. Responsible for sound design, composition, arranging, and editing of broadcast and industrial productions.
- 1990-1992 ART INSTITUTE OF HOUSTON, Houston, Texas.** *Video Production Instructor.* Reported to departmental chairman. Responsible for the instruction of all video/media students from first-year students to those qualifying for graduation. Taught all aspects of camera operation, directing, audio, video editing, and production.
- 1988-1990 FAMILY NETWORK, Lynchburg, Virginia.** *Director/Producer.* Reported to President of Production. Directed and produced video productions for national broadcast.
- 1986-1988 OCEAN CITY POLICE DEPARTMENT, Ocean City, Maryland.** *Police Officer.* Reported to Captain of division. Responsible for carrying out duties of an officer of the law. Also placed in charge of producing/ directing all PSAs, commercials, training videos, and industrial videos for the department.
- 1986-Present Worked on a vast array of freelance productions including the following notable productions:**
- Producer/arranger for over a dozen music albums including:**
- DC Talk
 - Houston Children's Chorus
 - Cathy Lott
 - Rene McLaurin
 - Worship 'Til It Hurts
 - Times Of Refreshing
 - Lisa Trammel
 - Awakened
 - Melissa Bishop
- Director for numerous video productions (corporate, commercial, and music) including:**
- Shell Oil
 - The Cube
 - Josef Dahlman Music Video
 - The Houstonian Golf Club
 - Black Horse Golf Club
 - Waste Management
 - The Other Side - Concert Video
 - Vicki Yohe - Concert Video
 - College Baseball Broadcasts

Writer/Director of numerous stage plays and commercials including:

Celebra
The Drummer
Make Me A Believer
Last Stop
The Stranger

Original music composition/arrangement/production – Broadcast work for:

McCann-Erickson
Fogarty Klein
Ogilvy & Mather
Rives Carlberg
Coleman & Coleman
Stan & Lou
VTTV
Freed Advertising
Locke Bryan
Lopez Negrete
Love Advertising
Astros Baseball
Mix 96.5 Radio Station
The Arrow Radio Station
Sunny 99.1 Radio Station
Whole Wheat Creative
Goswick Advertising
Marrot Communications
Bill Young Productions
United Stations

Acting & Performing in numerous stage plays & musicals including:

The Crucible
Camelot
Fiddler On The Roof
A Man For All Seasons
You're A Good Man, Charlie Brown
House of Blue Leaves
Comedy Of Errors
Holy Ghosts
Annie

Professional voice actor for numerous nationally released animated programs

(for a list of credits please see www.IMDB.com)

Commercials & Films including:

Twice Given - film
The James Brady Story - film
Space Camp - film
"Everyone's Internet" - commercial
"James T. Davis" - commercial
"P.F.A." - commercial
"The Light" - commercial
"Chance" - Music Video
"Baker Jackson Nissan"- radio
"Pulte Homes"- radio

EDUCATION & TECHNICAL PROFICIENCIES:

Bob Jones University - Cinema Major
Liberty University – B.S. in Television production (1986)
ProTools, Photoshop, Premiere, Media Composer, MIDI sequencing

REFERENCES AVAILABLE UPON REQUEST

JSL DEC.
EXHIBIT 3

V I C S W O R L D



CLICK HERE TO PLAY

Vic's voice demo reel

One of the most prolific and sought-after voice actors in the business, Vic has recorded hundreds of roles for animated features, TV series, and video games. He was honored with the American Anime Award for what is perhaps his most famous voice role: "Edward Elric" in the worldwide phenomenon *Fullmetal Alchemist*.

Anime is the word that's commonly used to describe animated programs created in Japan — occasionally referred to as "Japanimation." The drawing style is very unique and immediately recognizable. Companies such as **FUNIMATION** import these series, recast them with English-speaking actors, and offer them to American audiences for television, theatrical release, or direct-to-video at retail stores.

The medium has such a large and growing fanbase that there are *anime* conventions held all over the world, attended by thousands of devoted fans who come together to meet celebrity guests... and to share and enjoy the art form which they love!

For a full list of Vic's voice acting credits, visit **IMDb**.





[CLICK HERE TO DOWNLOAD](#)

Vic's original recording of *The Gospel of John*



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EXHIBIT 4

VIC'S WORLD

MUSIC

FILM

VOICE

LINKS

Sound *makes* the picture. Most production professionals know this to be true. One of the strongest and most prolific services that Vic provides is the composition, arrangement, and production of original music.

Vic's albums, singles, and sheet music are available via his official **FAN CLUB** and **iTUNES!**

Vic has been composing and producing original music for broadcast and commercial clients for over 15 years, working with advertising agencies, production companies, and TV stations. He's also created hundreds of parodies for radio stations around the country. After all... everyone needs a good laugh, and everyone loves music. So it only makes sense to put the two together!

In addition to commercial and broadcast music work, Vic's supervised a wide variety of private recording projects as well... from contemporary Christian to rap; from children's choral to Latino. He's produced over 20 independent albums, and regularly works with artists in all styles of song.

And finally... There's no greater music than that which worships the Creator of *all* music! Vic counts it a great joy and privilege to lead worship at venues around the country, having produced several praise



and worship albums.



CLICK HERE TO PLAY

just a few examples of Vic's work, including his original music commercial demo.
Use the pull-down menu to switch between genres.



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EXHIBIT 5

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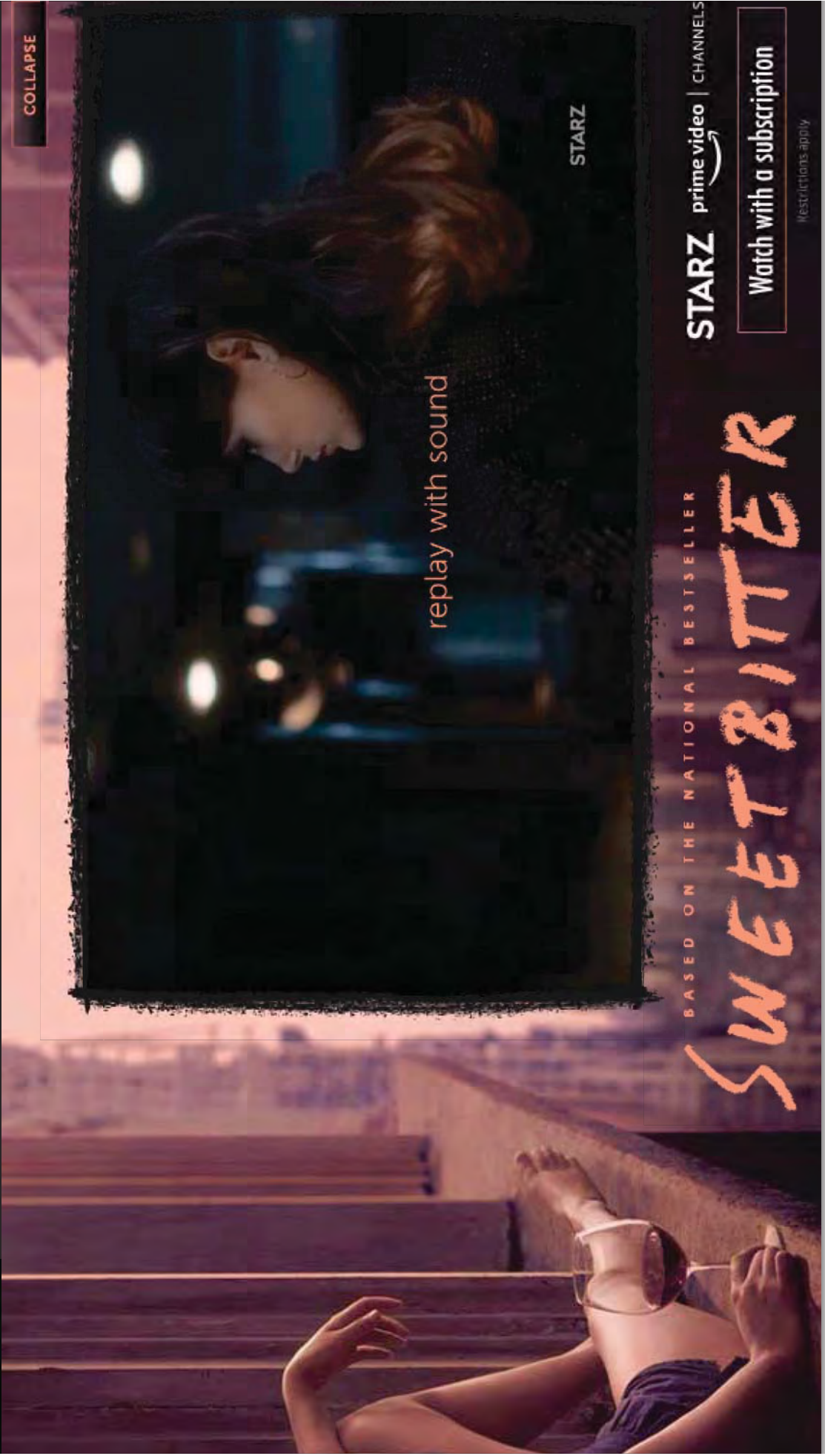
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EXHIBIT 6

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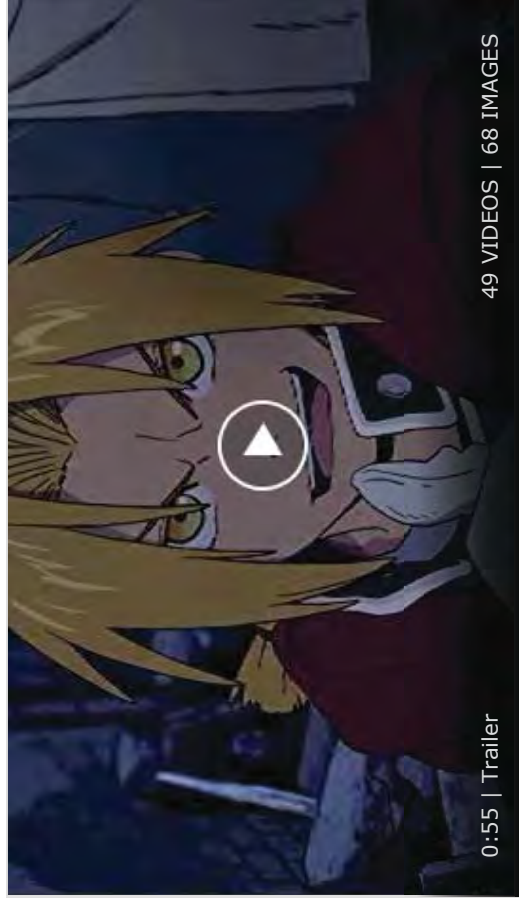
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Vic Mignogna

Actor | Music Department | Sound Department

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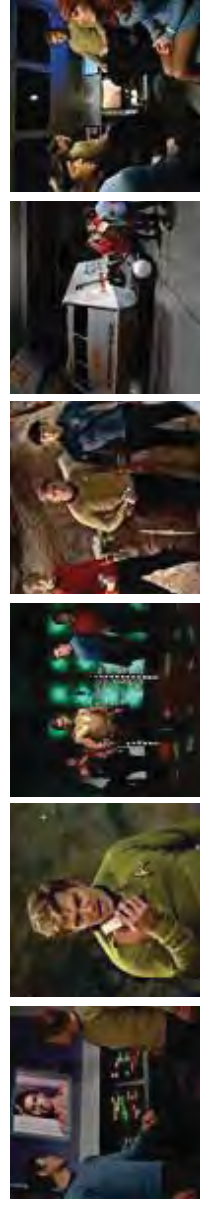
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Vic Mignogna was born on August 27, 1962 in Greensburg, Pennsylvania, USA as Victor Joseph Mignogna. He is known for his work on [Star Trek Continues](#) (2013), [Fullmetal Alchemist: The Sacred Star of Milos](#) (2011) and [Star Trek Continues: The Vignettes](#) (2012). [See full bio](#) »

Born: August 27, 1962 in Greensburg, Pennsylvania, USA

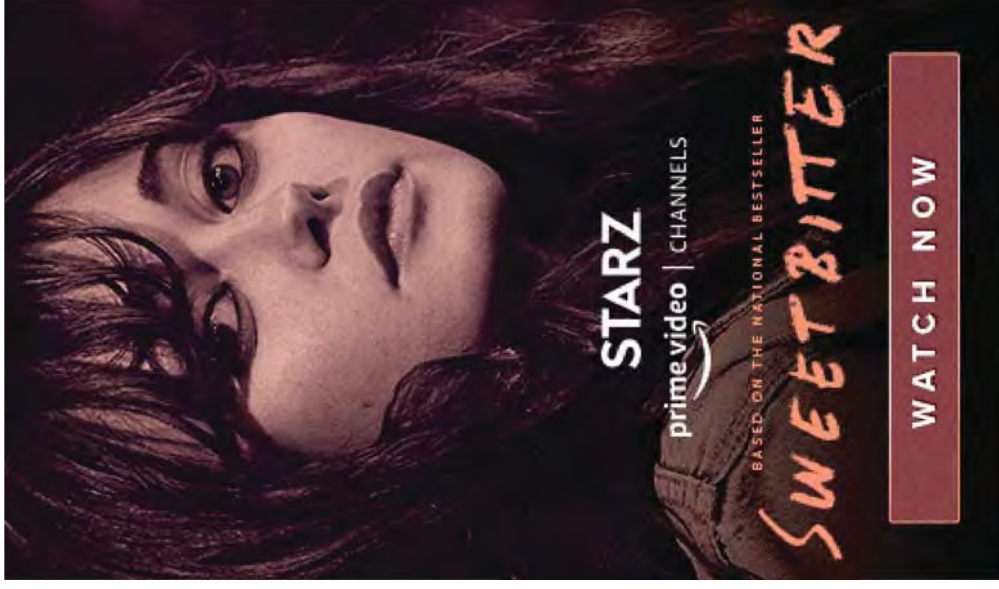
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The Rise of Zendaya

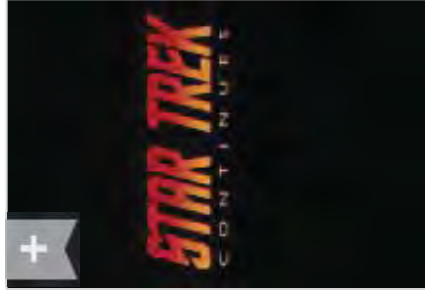
Known For



Star Trek Continues
Captain James T. Kirk
(2013-2017)



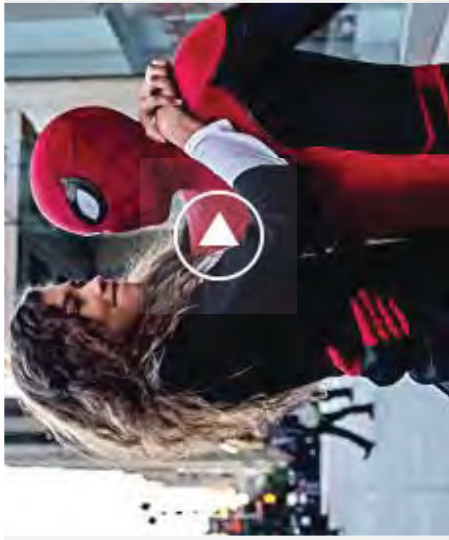
Fullmetal Alchemist: The...
Edward Elric
(2011)



Star Trek Continues: Th...
Captain James T. Kirk
(2012)



Fullmetal Alchemist: Bro...
Edward Elric / Barry the ...
(2009-2012)



Zendaya currently stars as MJ in *Spider-Man: Far from Home* and Rue in the HBO series "Euphoria." What other roles has she played?

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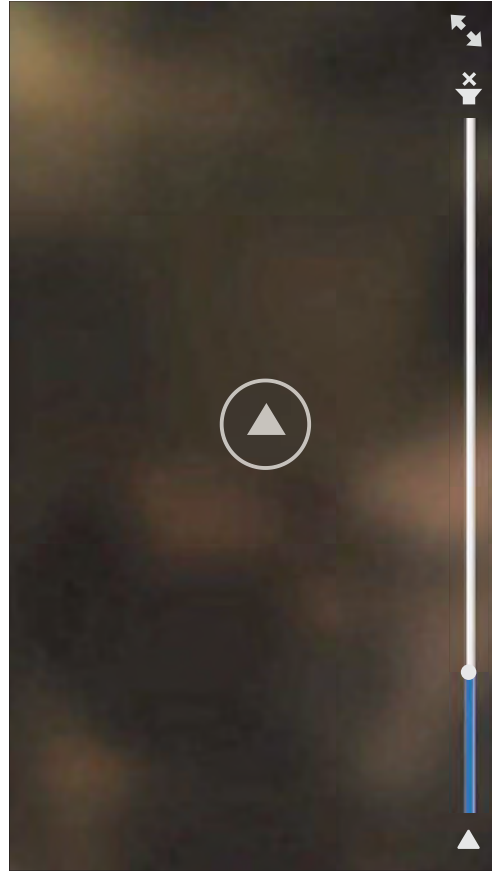
Appreciating the Voice Acting Work of Vic Mignogna (Outside the Allegations)

24 May 2019 | TVovermind.com

Vic Mignogna Sues Funtimation, Other Voice Actors for Defamation
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Filmography

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Actor (357 credits)

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Fruit of the Poisonous Tree (*pre-production*)

Christopher Bennett

Norse Noir: Loki's Exile, Chapter I (Video Game) (*filming*)

Fimafeng (voice)

Ominous (*filming*)

Nathan O'Neil

Stringer (*filming*)

Doctor Kaufman

Humber City: The Rising Tide (TV Movie) (*post-production*)

Paul Lambert

Bubsy: Paws on Fire! (Video Game)

Bubsy Bobcat / Terrence Bobcat (voice)

2019

When the Train Stops (Short)

Sheriff Angus Crow

2019

RWBY (TV Series)

Qrow Branwen

2015-2019

- Our Way (2019) ... Qrow Branwen (voice)
- Seeing Red (2019) ... Qrow Branwen (voice)
- The Lady in the Shoe (2019) ... Qrow Branwen (voice)
- Stealing from the Elderly (2019) ... Qrow Branwen (voice)
- Lost (2018) ... Qrow Branwen (voice)

Show all 45 episodes

The Morose Mononokean (TV Series)

Gyosei (Executive)

2019

- Greetings (2019) ... Gyosei (Executive) (English version, voice)
- The Tail (2019) ... Gyosei (Executive) (English version, voice)
- The Limb Screen (2019) ... Gyosei (Executive) (English version, voice)

Baki (TV Series)

Shibukawa

2018

- Real Attack (2018) ... Shibukawa (English version, voice)
- Slash (2018) ... Shibukawa (English version, voice)
- Super Muscular Strength (2018) ... Shibukawa (English version, voice)
- A Match vs. a True Fight (2018) ... Shibukawa (English version, voice)

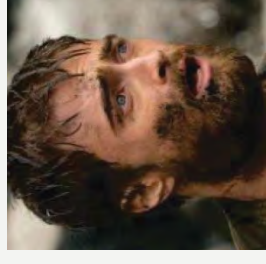
One of Anime's Biggest Voices Accused of Sexual Harassment

19 February 2019 | The AV Club

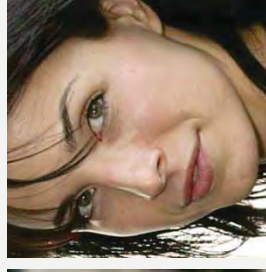
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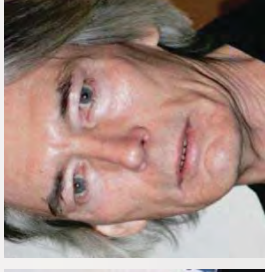
'Deadpool' Creator Does Not Approve Of Radcliffe As 'Wolverine'



Actors We Lost in 2019



The GEICO Caveman is Unrecognizably Handsome in Real Life



Celebs We've Lost in 2019

On Prime Video

[Digimon Adventure tri: Reunion](#) Watch Now

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- A Formidable Team (2018) ... Shibukawa (English version, voice)
 Show all 7 episodes

Dragon Ball Super: Broly
 Broly (English version, voice)

2018

Miraculous: Tales of Ladybug & Cat Noir (TV Series)
 Additional Voices

2015-2018

- Heroes Day, Part 2: Mayura (2018) ... Additional Voices (voice)
 - Heroes Day, Part 1: Catalyst (2018) ... Additional Voices (voice)
 - Frozer (2018) ... Additional Voices (voice)
 - Malediktator (2018) ... Additional Voices (voice)
 - Queen Wasp (2018) ... Additional Voices (voice)
 Show all 27 episodes

Overlord (TV Series)
 Roberdyck Goltron

2018

- A Handful of Hope (2018) ... Roberdyck Goltron (English version, voice)
 - Butterfly Entangled in a Spider's Web (2018) ... Roberdyck Goltron (English version, voice)
 - Invitation to Death (2018) ... Roberdyck Goltron (English version, voice)

Free! (TV Series)
 Rin Matsuoka

2018

- The Mermaid of the Abyss! (2018) ... Rin Matsuoka (voice)

RWBY Chibi (TV Series)
 Qrow Branwen

2017-2018

- Play with Penny (2018) ... Qrow Branwen (voice)
 - JNPR Dreams (2018) ... Qrow Branwen (voice)
 - Tea Party (2018) ... Qrow Branwen (voice)
 - Mortal Frenemies (2018) ... Qrow Branwen (voice)
 - Evil Interview (2018) ... Qrow Branwen (voice)
 Show all 12 episodes

Fate/Extra Last Encore (TV Series)
 Robin Hood

2018

- Rose of Cheers - Olympia Plaudelet (2018) ... Robin Hood (English version, voice)
 - Turner of the Wheel - Chakravartin (2018) ... Robin Hood (English version, voice)
 - Tenrin Suru Shouri no Ken: Excalibur Galatine (2018) ... Robin Hood (English version, voice)
 - Mugen no zangai: Unlimited/Raise Dead (2018) ... Robin Hood (English version, voice)
 - Maneki tou kogane gekijo: Aestus Domus Aurea (2018) ... Robin Hood (English version, voice)
 Show all 13 episodes

Mecard (TV Series)
 Tero

2018

- Reclaiming Tanatos (2018) ... Tero (voice)
 - The Mecardimals of Darkness (2018) ... Tero (voice)

Projects In Development

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The LEGO Movie (Viz Media / Funimation Redub)
 a list of 36 people
 created 03 Oct 2017



Live Action "Mega Man" Cast
 a list of 34 people
 created 15 May 2014



Favorite Actor/Actress list
 a list of 42 people
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- Battle at the Beach (2018) ... Tero (voice)
- The Truth About Isobel (2018) ... Tero (voice)
- New Kid, New Mystery. (2018) ... Tero (voice)

Pokémon the Movie: The Power of Us

Additional Voices (English version, voice)

2018

Deadpool The Musical 2 - Ultimate Disney Parody (Short)

Beast / Captain America (voice)

2018

RWBY: Volume 5 (Video)

Qrow Branwen (voice)

2018

Persona 3: Dancing in Moonlight (Video Game)

Junpei Iori (English version, voice, uncredited)

2018

Digimon Adventure Tri. 6: Future

Matt Ishida (English version, voice)

2018

Garou: Vanishing Line (TV Series)

Fei Long

2017-2018

- Future (2018) ... Fei Long (English version, voice)
- Rebirth (2017) ... Fei Long (English version, voice)
- Setting Off (2017) ... Fei Long (English version, voice)
- Knight (2017) ... Fei Long (English version, voice)
- Intricacy (2017) ... Fei Long (English version, voice)

Dragon Ball FighterZ (Video Game)

Broly (English version, voice, uncredited)

2018

Juuni Taisen (TV Mini-Series)

Additional Voices

2017

- The One Wish that must be Granted, and the Ninety-nine that can be done Without (2017) ... Additional Voices (English version, voice)
 - In Like a Dragon, Out Like a Snake Part 2 (2017) ... Additional Voices (English version, voice)
 - Even a Champion Racehorse May Stumble (2017) ... Additional Voices (English version, voice)
 - A Wolf in Sheep's Clothing (2017) ... Additional Voices (English version, voice)
 - The Enemy, a Noble Primate (2017) ... Additional Voices (English version, voice)
- Show all 8 episodes

Star Trek Continues (TV Series)

Captain James T. Kirk

2013-2017

- To Boldly Go: Part II (2017) ... Captain James T. Kirk
 - To Boldly Go: Part I (2017) ... Captain James T. Kirk
 - What Ships Are For (2017) ... Captain James T. Kirk
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- Show all 11 episodes

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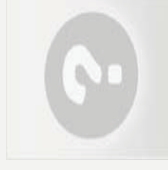
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How Much Have You Seen?

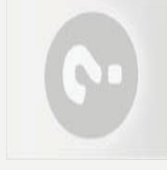
How much of [Vic Mignogna's work](#) have you seen?



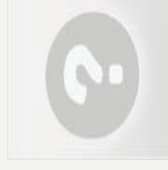
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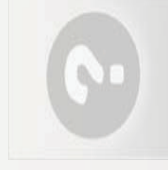
The Chosen Ones



Myers-Briggs Personalities of Fictional Characters



Favorite Fictional Epic Leader?

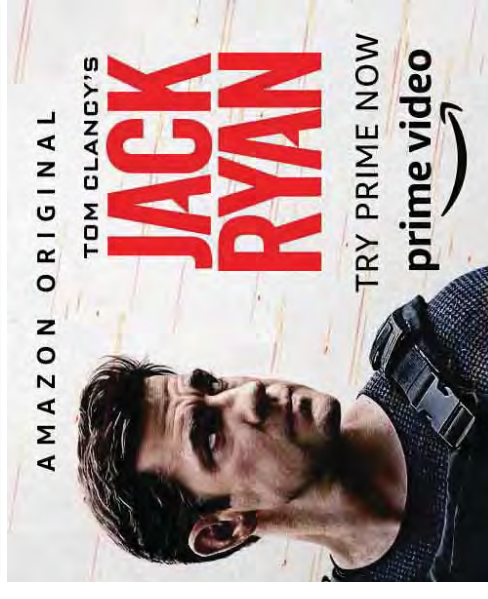


Movie/TV Quotes That Became Memes

Most Giftable Movie

Series?

- Sonic Forces** (Video Game)
E-123 Omega (English version, voice) 2017
- Kino's Journey: The Beautiful World - The Animated Series** (TV Mini-Series)
Storyteller 2017
- Country of Liars (2017) ... Storyteller (English version, voice)
- Bubsy: The Woolies Strike Back** (Video Game)
Bubsy Bobcat (voice) 2017
- The Reflection** (TV Mini-Series)
X-On / Arms Dealer 2017
- The Reflection (2017) ... X-On (voice)
- White Sands (2017) ... X-On (voice)
- Eleanor (2017) ... X-On (voice)
- Downtown LA (2017) ... X-On (voice)
- Beef or Fish (2017) ... X-On (voice)
Show all 12 episodes
- Fullmetal Alchemist**
Edward Elric (English version, voice) 2017
- Digimon Adventure Tri. 5: Coexistence**
Matt Ishida (English version, voice) 2017
- Bungou Stray Dogs** (TV Series)
Rampo Edogawa 2016-2017
- OVA: He Walks Alone (2017) ... Rampo Edogawa (English version, voice)
- If I May Shed Away My Burden Now (2016) ... Rampo Edogawa (English version, voice)
- Poe and Rampo - Moby Dick, Swimming in the Sky (2016) ... Rampo Edogawa (English version, voice)
- The Strategy of Conflict (2016) ... Rampo Edogawa (English version, voice)
- Bungo Stray Dogs (2016) ... Rampo Edogawa (English version, voice)
Show all 12 episodes
- RWBY: Volume 4** (Video)
Qrow Branwen (voice) 2017
- ACCA: 13-Territory Inspection Dept.** (TV Series)
Additional Voices 2017
- Furawau's Flowers Smell of Malice (2017) ... Additional Voices (English version, voice)
- Digimon Adventure Tri. 4: Loss**
Matt Ishida (English version, voice) 2017
- Suspense** (TV Series)
Agent Kurt Costigan / Norbert Whitaker / Steve / ... 2015-2017
- Learning Curve (2017) ... Agent Kurt Costigan



<ul style="list-style-type: none"> - 'I Am Not Part of This World' (2016) ... Norbert Whitaker - Man from the South (2016) ... Steve - The Corpse & the Kid (2015) ... Gordon - Testament (2015) ... Colonel Luke Malloy 	2017
<p>Chaos;Child (TV Series) General</p> <ul style="list-style-type: none"> - Digital Native (2017) ... General (English version, voice) - Chaos;Head (2017) ... General (English version, voice) 	2016
<p>Altered Spirits Skip</p>	2016
<p>JoJo's Bizarre Adventure (TV Series) Rohan Kishibe</p> <ul style="list-style-type: none"> - Crazy Diamond Is Unbreakable, Part 2 (2016) ... Rohan Kishibe (English version, voice) - Another One Bites the Dust, Part 1 (2016) ... Rohan Kishibe (English version, voice) - July 15th (Thurs), Part 4 (2016) ... Rohan Kishibe (English version, voice) - July 15th (Thurs), Part 3 (2016) ... Rohan Kishibe (English version, voice) - Highway Star, Part 2 (2016) ... Rohan Kishibe (English version, voice) <p>Show all 10 episodes</p>	2016
<p>Yuri!!! On Ice (TV Series) Nobunari Oda / Additional Voices</p> <ul style="list-style-type: none"> - Gotta Super-Supercharge It!! Grand Prix Final Short Program (2016) ... Nobunari Oda (English version, voice) - Gotta Supercharge It! Pre-Grand Prix Final Special! (2016) ... Nobunari Oda (English version, voice) - China's On! The Grand Prix Series Opening Event!! The Cup of China Free Skate (2016) ... Additional Voices (English version, voice) 	2016
<p>Lastman (TV Series) Additional Voices</p> <ul style="list-style-type: none"> - C'est la dernière fois que je vous le demande poliment (2016) ... Additional Voices (voice) - Le laisse jamais te toucher (2016) ... Additional Voices (voice) - Restez avec nous sur PaxNews (2016) ... Additional Voices (voice) - Action! (2016) ... Additional Voices (voice) - La famille, c'est toujours compliqué (2016) ... Additional Voices (voice) <p>Show all 9 episodes</p>	2016
<p>Fan-O-Rama (Short) Zapp Brannigan</p>	2016
<p>Naruto: Shippûden (TV Series) Nagato / Young Obito Uchiha / C / ...</p> <ul style="list-style-type: none"> - Jiraiya to Kakashi (2016) ... Obito Uchiha / Hidden Mist Ninja (English version, voice) - Omedetô (2016) ... Young Obito Uchiha / Byakuren, The First Mizukage (English version, voice) - Sharingan, futatabi (2016) ... Young Obito Uchiha (English version, voice) 	2008-2016

- Omae wa kanarazu (2016) ... Young Obito Uchiha (English version, voice)
 - Futari o chanto (2016) ... Young Obito Uchiha (English version, voice)
- Show all 94 episodes

Twin Star Exorcists (TV Series) 2016

Yuto Ijika

- Because I'm With You - Wai Wa Kinako Ya! (2016) ... Yuto Ijika (English version, voice)
 - Forever Smiling - Lovely Smile Forever (2016) ... Yuto Ijika (English version, voice)
 - A Promise with Sae - Missing Exorcist Master (2016) ... Yuto Ijika (English version, voice)
 - Unomiya Tenma - Transcendence (2016) ... Yuto Ijika (English version, voice)
 - Himitsu No Mayura-chan MAYURA'S SECRET LESSON (2016) ... Yuto Ijika (English version, voice)
- Show all 31 episodes

Dragon Ball: Xenoverse 2 (Video Game) 2016

Broly (English version, voice)

Show by Rock!! (TV Series) 2016

Syuzo

- Episode #2.4 (2016) ... Syuzo (English version, voice)

Pokémon Generations (TV Series) 2016

Tabitha

- The Vision (2016) ... Tabitha (English version, voice, uncredited)

Nanbaka (TV Series) 2016

Kenshirou Yozakura

- The Inmates Are Stupid! The Guards Are Kind of Stupid, Too! (2016) ... Kenshirou Yozakura (voice)

Danganronpa 3: The End of Hope's Peak Academy - Hope Arc (TV Series) 2016

Sosuke Ichino

- The School of Hope and the Students of Despair (2016) ... Sosuke Ichino (voice)

Digimon Adventure Tri. 3: Confession 2016

Matt Ishida (English version, voice)

Danganronpa 3: The End of Hope's Peak Academy - Despair Arc (TV Series) 2016

Sosuke Ichino / Additional Voices

- Goodbye, Hope's Peak High School (2016) ... Sosuke Ichino (voice)
 - Smile At Despair in the Name of Hope (2016) ... Sosuke Ichino / Additional Voices (voice)
 - Chisa Yukizome Doesn't Smile (2016) ... Sosuke Ichino / Additional Voices (voice)
 - The Worst Reunion by Chance (2016) ... Sosuke Ichino / Additional Voices (voice)
 - The Biggest, Most Atrocious Incident in Hope's Peak High School's History (2016) ... Sosuke Ichino / Additional Voices (voice)
- Show all 11 episodes

World of Warcraft: Legion (Video Game) 2016

Ranger Orestes (voice, uncredited)

Accel World: Infinite Burst Viridian Decurion / Yellow Radio (English version, voice)	2016
One Piece Film: Gold Sabo (English version, voice)	2016
Assassination Classroom (TV Series) Additional Voices - Future Time (2016) ... Additional Voices (English version, voice) - Graduation Time (2016) ... Additional Voices (voice) - Final Boss Time (2016) ... Additional Voices (voice) - Happy Birthday Time (2016) ... Additional Voices (voice) - Trust Time (2016) ... Additional Voices (voice) Show all 47 episodes	2015-2016
Boku no Hero Academia (TV Series) Additional Voices - Upon Each of Their Hearts (2016) ... Additional Voices (English version, voice) - All Might (2016) ... Additional Voices (English version, voice) - Game Over (2016) ... Additional Voices (English version, voice) - Encounter with the Unknown (2016) ... Additional Voices (English version, voice) - Yeah, Just Do Your Best, Iida! (2016) ... Additional Voices (English version, voice) Show all 13 episodes	2016
Joker Game (TV Mini-Series) Aaron Price - Pursuit (2016) ... Aaron Price (English version, voice)	2016
RWBY: Volume 3 (Video) Qrow Branwen (voice)	2016
Shōnen Maid (TV Series) Additional Voices - Feed a Dog for Three Days and He Will Remember It for Three Years (2016) ... Additional Voices (English version, voice)	2016
Tweet Out (TV Series) - Vic Mignogna (2016)	2016
Quest (Short) Frank (voice)	2016
Digimon Adventure Tri. 2: Decision Matt Ishida (English version, voice)	2016
Ajin (TV Series) Reporter - I Swear I'll Cover The Whole Thing Up (2016) ... Reporter (English version, voice)	2016

Utawarerumono: The False Faces (TV Series) Benaui - Warrior (2016) ... Benaui (English version, voice)	2016
Mario & Sonic at the Rio 2016 Olympic Games (Video Game) E-123 Omega (English version, voice, uncredited)	2016
Dragon Ball Super (TV Series) Geppuman - Zūnō-Sama no moto ei Sūpā Doragon Bōru no ari ka o kikiidase! (2016) ... Geppuman (English version, voice)	2016
Divine Gate (TV Series) Additional Voices - The Defiers (2016) ... Additional Voices (English version, voice)	2016
Naruto Shippūden: Ultimate Ninja Storm 4 (Video Game) Cee / Nagato / Obito Uchiha / ... (English version, voice)	2016
Shomin Sample (TV Series) Konoe's Father - Inexperienced Though I Am, Please Accept Me Forever (2015) ... Konoe's Father (English version, voice)	2015
Attack on Titan: Junior High (TV Series) Eld Gin - Attack! Titan Junior High School (2015) ... Eld Gin (voice) - Clear and Sunny! Titan Junior High School (2015) ... Eld Gin (voice) - Recommendation! Titan Junior High School (2015) ... Eld Gin (voice) - Sweet Summer! Titan Junior High School (2015) ... Eld Gin (voice) - Spine-chiller! Titan Junior High School (2015) ... Eld Gin (voice) Show all 12 episodes	2015
One Punch Man (TV Series) Melzargard / Child - Saikyō no hîrō (2015) ... Melzargard / Child (English version, voice) - Zen ushū no hashā (2015) ... Melzargard (English version, voice) - Katsute nai hodo no kiki (2015) ... Melzargard (English version, voice)	2015
Fairy Tail (TV Series) Mard Greer / Mard Geer - Drops of Fire (2015) ... Mard Greer (English version, voice) - Soaring in Ishgar (2015) ... Mard Geer (English version, voice) - Memento Mori (2015) ... Mard Geer (English version, voice) - The Definitive Demon (2015) ... Mard Greer (English version, voice) - The Girl in the Crystal (2015) ... Mard Geer (English version, voice) Show all 15 episodes	2015

The Asterisk War: The Academy City on the Water (TV Series) Randy Hooke / Ernest Fairclough	2015
<ul style="list-style-type: none"> - The Gravi-Sheath (2015) ... Ernest Fairclough (English version, voice) - The Tyrant Vampire Princess (2015) ... Randy Hooke (English version, voice) - The Phoenix Festa (2015) ... Randy Hooke (English version, voice) - Lightning Blade Speed (2015) ... Ernest Fairclough (English version, voice) - A Holiday for Two (2015) ... Randy Hooke (English version, voice) Show all 7 episodes	
Pokémon (TV Series) Saizo / Sylvester / Scooter / ...	2011-2015
<ul style="list-style-type: none"> - Decisive Battle in the Ninja Village! Gekogashira VS Kirikizan! (2015) ... Saizo (English version, voice) - Ninja Arts Showdown! Gekogashira VS Gamenodes!! (2014) ... Saizo (English version, voice) - Reunion Battles at Nimbasa (2011) ... Sylvester / Scooter (English version, voice) - Ligray and the UFO! (2011) ... Professor Icarus (voice) 	
Heroes: Legend of the Battle Disks (TV Series) Additional Voices / Goblu	2015
<ul style="list-style-type: none"> - "I Won't Give Up! The Do Or Die Disk Collection!" (2015) ... Goblu (voice) - Off I Go, To The Seas Of Zairan! (2015) ... Additional Voices (voice) - Exploration! The Secret Ancient Ruins! (2015) ... Additional Voices (voice) 	
Digimon Adventure tri: Reunion Matt Ishida (English version, voice)	2015
God Eater: Resurrection (Video Game) Male Custom Voice #2 (English version, voice, uncredited)	2015
Himouto! Umaru-chan (TV Series) Arcade Lackey / Prancing Car Salesman	2015
<ul style="list-style-type: none"> - Umaru and Everyone (2015) ... Prancing Car Salesman (English version, voice) - Umaru's Days (2015) ... Arcade Lackey (English version, voice) - Umaru and Her Rival (2015) ... Arcade Lackey (English version, voice) 	
Charlotte (TV Series) Kazuki Tomori	2015
<ul style="list-style-type: none"> - Encounter (2015) ... Kazuki Tomori (English version, voice) - Melody of Despair (2015) ... Kazuki Tomori (English version, voice) 	
One Piece: Episode of Sabo: Bond of Three Brothers, A Miraculous Reunion and an Inherited Will (TV Movie) Sabo (English version, voice)	2015
Digimon Fusion (TV Series) Christopher	2013-2015
<ul style="list-style-type: none"> - Final Fusion - The Fight for Earth! (2015) ... Christopher (voice) - Mikey Goes to Another World (2013) ... Christopher (voice) 	

Star Trek: Renegades (TV Series) Garls - Pilot (2015) ... Garls	2015
Hetalia: Axis Powers (TV Series) Greece - The Life of the Great Man, the Awesome Me (2015) ... Greece (voice)	2015
The Disappearance of Nagato Yuki-chan (TV Series) Additional Voices - Fireworks (2015) ... Additional Voices (voice) - The Plotting of Haruhi Suzumiya (2015) ... Additional Voices (voice)	2015
Prince Adventures: Anointed (Video short) Prince Nai Tehuti (voice)	2015
Arslan Senki (TV Series) Silver Mask / Hermes / Hilmes - The Glory of Ecbatana (2015) ... Silver Mask / Hermes / Hilmes (English version, voice)	2015
Garo the Animation (TV Series) Mendoza - Chistolite (2015) ... Mendoza (English version, voice) - Doom (2015) ... Mendoza (English version, voice) - Dreadly Focus (2015) ... Mendoza (English version, voice) - Knights (2015) ... Mendoza (English version, voice) - Double Dealer (2015) ... Mendoza (English version, voice) Show all 24 episodes	2014-2015
Yona of the Dawn (TV Series) Additional Voices - From Now On (2015) ... Additional Voices (voice) - The Night History Is Made (2015) ... Additional Voices (voice) - Morning of Promise (2015) ... Additional Voices (voice) - Spark (2015) ... Additional Voices (voice) - Chain of Courage (2015) ... Additional Voices (voice) Show all 18 episodes	2014-2015
Aldnoah.Zero (TV Series) Klanclain - The Unvanquished (2015) ... Klanclain (English version, voice) - Out of the Past (2015) ... Klanclain (English version, voice) - The Fortune's Fool (2015) ... Klanclain (English version, voice)	2015
Dragon Ball: Xenoverse (Video Game) Broly (English version, voice)	2015

Durarara!!x2 (TV Series) Kasuka Heiwajima	2015
<ul style="list-style-type: none"> - When in Rome, Do as the Romans Do (2015) ... Kasuka Heiwajima (English version, voice) - Adding Insult to Injury (2015) ... Kasuka Heiwajima (English version, voice) - A Picture Is Worth a Thousand Words (2015) ... Kasuka Heiwajima (English version, voice) 	
Iesodo: Joy (Short) Hawk, Angel, Norman (voice)	2014
Lord Marksman and Vanadis (TV Series) Roland	2014
<ul style="list-style-type: none"> - The Widening World (2014) ... Roland (voice) - The Holly Grotto (Saint-Groel) (2014) ... Roland (voice) - Two War Maidens (2014) ... Roland (voice) - The Ormea Campaign (2014) ... Roland (voice) - Thunder Swirl and Luminous Flame (2014) ... Roland (voice) Show all 13 episodes	
Burazâzu konfurikuto (TV Mini-Series) Futo Asahina	2013-2014
<ul style="list-style-type: none"> - Brothers Conflict (OVA) (2014) ... Futo Asahina (voice) - Romance (2013) ... Futo Asahina (English version, voice) - Love-Hate (2013) ... Futo Asahina (English version, voice) - Enlightenment (2013) ... Futo Asahina (English version, voice) - Nightmare (2013) ... Futo Asahina (English version, voice) Show all 11 episodes	
The New Adventures of Pinkgirl and The Scone (TV Series) Whatnot	2012-2014
<ul style="list-style-type: none"> - A Bitch of Bastard (2014) ... Whatnot - What's the What with Whatnot? (2014) ... Whatnot - ...New Hotness (2012) ... Whatnot 	
World of Warcraft: Warlords of Draenor (Video Game) Ner'zhul (voice)	2014
Attack on Titan Crimson Bow and Arrow Eld Gin (English version, voice)	2014
Pac-Man and the Ghostly Adventures 2 (Video Game) Spiral (voice)	2014
Rune Factory 4 (Video Game) Vishnal (voice)	2014
Naruto Shippûden: Ultimate Ninja Storm Revolution (Video Game) Cee / Nagato / Young Obito Uchiha (English version, voice)	2014

The Verse (Short) Commodore Woodruff	2014
Persona 4: Arena Ultimax (Video Game) Junpei Iori / Igor (English version, voice, uncredited)	2014
Space Dandy (TV Series) Gentle - Gallant Space Gentleman, Baby (2014) ... Gentle (English version, voice) - The Big Fish Is Huge, Baby (2014) ... Gentle (English version, voice)	2014
Doctor Who Online Adventures (TV Series short) Vaylor - Betrayal: Part 3 (2014) ... Vaylor (voice) - Betrayal: Part 2 (2014) ... Vaylor (voice) - Betrayal: Part 1 (2014) ... Vaylor (voice)	2014
Villains (Short) Narrator	2014/III
Sengoku Basara: End of Judgement (TV Series) Tenkai (English version, voice)	2014
Persona Q: Shadow of the Labyrinth (Video Game) Junpei Iori (English version, voice, uncredited)	2014
GRID Autosport (Video Game) (voice)	2014
Ace Combat Infinity (Video Game) Additional Voices (English version, voice)	2014
Smite (Video Game) Serenity Yamana (voice)	2014
Heartstone: Heroes of Warcraft (Video Game) Ner'Zhul (voice)	2014
Yu-Gi-Oh! Zexal (TV Series) Shark - The Future of Three Worlds (2014) ... Shark (voice) - The Battle of Three Worlds (2014) ... Shark (voice) - The Fate of Three Worlds (2014) ... Shark (voice) - A Thousand Ways to Lose (2014) ... Shark (voice) - A Sea of Troubles: Part 2 (2013) ... Shark (voice) Show all 10 episodes	2011-2014
Tokyo Ravens (TV Series) Makihara	2014

- _DARKNESS_EMERGE_ -Divine Fan- (2014) ... Makihara	
Dragon Ball Z: Battle of Z (Video Game) Broly (English version, voice)	2014
Star Trek New Voyages: Phase II (TV Series) Malkthon / Thoran / Extra / ... - Kitumba (2013) ... Malkthon - Enemy Starfleet (2011) ... Thoran / Extra - Origins: The Protracted Man ... George Kirk	2011-2013
Unbreakable Machine Doll (TV Series) Shin - Facing "Elf Speeder" III (2013) ... Shin (English version, voice) - Facing "Elf Speeder" II (2013) ... Shin (English version, voice)	2013
Attack on Titan (TV Series) Eld Gin - OVA: Ilse's Notebook (2013) ... Eld Gin (English version, voice) - The Defeated: The 57th Expedition Beyond the Walls, Part 6 (2013) ... Eld Gin (English version, voice) - Iron Hammer: The 57th Expedition Beyond the Walls, Part 5 (2013) ... Eld Gin (English version, voice) - Erwin Smith: The 57th Expedition Beyond the Walls, Part 4 (2013) ... Eld Gin (English version, voice) - Bite: The 57th Exterior Scouting Mission, Part 3 (2013) ... Eld Gin (English version, voice) Show all 8 episodes	2013
Lightning Returns: Final Fantasy XIII (Video Game) Clerk (voice, as Vic Mignogna)	2013
Mario & Sonic at the Sochi 2014 Olympic Winter Games (Video Game) E-123 Omega (English version, voice)	2013
Pac-Man and the Ghostly Adventures (Video Game) Spiral (voice)	2013
R.U.R.: Genesis (Short)	2013
Phoenix Wright: Ace Attorney - Dual Destinies (Video Game) Gaspen Payne (English version, voice, uncredited)	2013
Fallout: Red Star (TV Series) Trader - Episode #1.1 (2013) ... Trader	2013
Karneval (TV Series) Karoku - Opus 13: Karneval (2013) ... Karoku (English version, voice) - Opus 12: The Rainbow Promise (2013) ... Karoku (English version, voice) - Opus 11: Ice-Cream Parade (2013) ... Karoku (English version, voice)	2013

<ul style="list-style-type: none"> - Opus 10: Beastmaster's Tears (2013) ... Karoku (English version, voice) - Opus 9: Blue Rose (2013) ... Karoku (English version, voice) Show all 11 episodes	
Marvel Heroes (Video Game) Uatu the Watcher (voice)	2013
Naruto Shippûden: Ultimate Ninja Storm 3 (Video Game) Cee / Nagato / Obito Uchiha (English version, voice)	2013
Singularity (Short) Nigel	2012
Magi: The Kingdom of Magic (TV Series) Ka Kobun - Aratanaru kôtei (2012) ... Ka Kobun	2012
Starship Farragut (TV Series) Captain James T. Kirk - The Price of Anything (2012) ... Captain James T. Kirk	2012
Star Trek Continues: The Vignettes (TV Series) Captain James T. Kirk - Happy Birthday, Scotty (2012) ... Captain James T. Kirk - You've Got the Conn (2012) ... Captain James T. Kirk - Turnabout Intruder (2012) ... Captain James T. Kirk	2012
Mass Effect: Paragon Lost (Video) Messner (voice)	2012
Sword Art Online (TV Series) Salamander / Onlooker - The Lugru Corridor (2012) ... Salamander (English version, voice) - Black and White Sword Dance (2012) ... Onlooker (English version, voice)	2012
Tales of Xillia 2 (Video Game) Additional Voices (voice)	2012
Conan the Barbarian: Queen of the Black Coast (Video short) Conan	2012
Pokémon the Movie: Kyurem vs. the Sword of Justice Keldeo (English version, voice)	2012
Accel World (TV Series) Yellow Radio - Absolution (2012) ... Yellow Radio (English version, voice) - Obligation (2012) ... Yellow Radio (English version, voice)	2012

Dragon's Dogma (Video Game) Additional Voices (voice)	2012
Fullmetal Alchemist: Brotherhood (TV Series) Edward Elric / Barry the Chopper / Truth - 4-Koma Theater (2012) ... Edward Elric (English version, voice) - Tabiji no hate (2010) ... Edward Elric (English version, voice) - Tobira no mukougawa (2010) ... Edward Elric / Truth (English version, voice) - Seizetsunaru hangeki (2010) ... Edward Elric (English version, voice) - Kami o nomikomishi mono (2010) ... Edward Elric (English version, voice) Show all 61 episodes	2009-2012
Todd of the Rings (Short) Vodo	2012
Bleach (TV Series) Ikkaku Madarame / Senbonzakura / Hozukimaru / ... - Ichigo vs. Ginjo! Secret of the Substitute Badge (2012) ... Ikkaku Madarame (English version, voice) - Desperate Struggle!? Byakuya's Troubled Memories (2012) ... Ikkaku Madarame (English version, voice) - Fierce Fight! Shinigami vs. XCUTION! (2012) ... Ikkaku Madarame (English version, voice) - Revival! Substitute Shinigami: Ichigo Kurosaki! (2012) ... Ikkaku Madarame (English version, voice) - Shinigami at War! New Year in Seireitei Special! (2012) ... Ikkaku Madarame (English version, voice) Show all 70 episodes	2005-2012
Strike Witches the Movie Shuji Yuki (English version, voice)	2012
Naruto Shippūden: Ultimate Ninja Storm Generations (Video Game) Nagato / Obito Uchiha / Cee (English version, voice)	2012
Persona 4: The Animation (TV Series) Kou Ichijo - A Stormy Summer Vacation 1/2 (2012) ... Kou Ichijo (English version, voice) - Would You Love Me? (2011) ... Kou Ichijo (English version, voice) - We Are Friends, Aren't We? (2011) ... Kou Ichijo (English version, voice)	2011-2012
Seinto Seiya: The Lost Canvas - Meio Shinwa (TV Series) Thanatos - Moshi ano hi ni kaereta: If I Could Return to That Day (2011) ... Thanatos (English version, voice) - Omaerashiku Are: Be Yourself (2011) ... Thanatos (English version, voice) - Ikuseiso: The Many, Many Years (2011) ... Thanatos (English version, voice) - Kessen No Toki: Hour of the Final Battle (2011) ... Thanatos (English version, voice) - Seiken: The Sacred Sword (2011) ... Thanatos (English version, voice) Show all 13 episodes	2011
Fainaru fantajī XIII-2 (Video Game) Additional Voices (English version, voice)	2011

Dynasty Warriors 7: Xtreme Legends (Video Game) Jia Xu / Xiahou Ba (English version, voice, uncredited)	2011
Mario & Sonic at the London 2012 Olympic Games (Video Game) E-123 Omega (English version, voice)	2011
Dragon Ball Z: Ultimate Tenkaichi (Video Game) Burter / Broly (English version, voice)	2011
Naruto Shippûden: Ultimate Ninja Impact (Video Game) Nagato / Madara Uchiha (English version, voice)	2011
Marvel Anime (TV Series) Hideki Kurohagi / Agent Takagi / Additional Voices / ... - Logan (2011) ... Hideki Kurohagi (voice) - Min (2011) ... Hideki Kurohagi (voice) - Reunion (2011) ... Righella (voice) - Kikyo (2011) ... Hideki Kurohagi / Agent Takagi (voice) - Yukio (2011) ... Hideki Kurohagi / Agent Takagi (voice) Show all 10 episodes	2010-2011
Fallout: Nuka Break (TV Series) Narrator / Old Man - Episode # 1.4 (2011) ... Narrator (voice) - Episode # 1.3 (2011) ... Narrator / Old Man - Episode # 1.2 (2011) ... Narrator (voice)	2011
Nura: Rise of the Yokai Clan (TV Series) Inugamigamigyobu Tamazuki - The Destiny of the Demon Capital (2011) ... Inugamigamigyobu Tamazuki (voice) - Long Standing Wish (2011) ... Inugamigamigyobu Tamazuki (voice) - The Legends of Tono (2011) ... Inugamigamigyobu Tamazuki (voice) - Kyokasugetsu (2011) ... Inugamigamigyobu Tamazuki (voice) - Yura's Realization (2011) ... Inugamigamigyobu Tamazuki (voice) Show all 20 episodes	2010-2011
Tiger & Bunny (TV Series) Additional Voices - Eternal immortality (2011) ... Additional Voices (voice) - Nothing ventured, nothing gained (2011) ... Additional Voices (voice) - Misfortunes never come singly (2011) ... Additional Voices (voice) - Bad Luck Often Brings Good Luck (2011) ... Additional Voices (voice) - Heaven helps those who help themselves (2011) ... Additional Voices (voice) Show all 25 episodes	2011
Shin Megami Tensei: Devil Survivor Overclocked (Video Game) Gigolo (English version, voice, uncredited)	2011

The Lion of Judah Raven #1 (voice)	2011
Gekijouban Sengoku Basara: The Last Party Tenkai (English version, voice)	2011
Fullmetal Alchemist: The Sacred Star of Milos Edward Elric (English version, voice)	2011
Operation Flashpoint: Red River (Video Game) Marines (voice)	2011
Dream Eater Merry (TV Series) Ryota Iijima - Yume futatabi (2011) ... Ryota Iijima (English version, voice) - Muen (2011) ... Ryota Iijima (English version, voice) - Yume no moribito (2011) ... Ryota Iijima (English version, voice) - Yume kara samezumi (2011) ... Ryota Iijima (English version, voice) - Yume midarete (2011) ... Ryota Iijima (English version, voice) Show all 11 episodes	2011
Sengoku basara (TV Series) Akechi Mitsuhide - Ryūko, Itadaki no Chikai! Atsuki Mirai e Kakeru Tamashiii! (2011) ... Akechi Mitsuhide (voice) - Sōkō Kesshisen! Gekitō no Hate ni Fuku Kaze no Oto yo!! (2010) ... Akechi Mitsuhide (voice) - Hasō Toyotomi Daihontai! Honki no Keiji, Danchō no Battō!! (2010) ... Akechi Mitsuhide (voice) - Fukkatsu no Wakaki Tora! Kaizō Daiyōsai-Nichirin no Kyōi, Higashi e!! (2010) ... Akechi Mitsuhide (voice) - Ryū to Oni Owari no Gekitotsu! Bakusō! Date-Chōsokabe Rengō Gun!! (2010) ... Akechi Mitsuhide (voice) Show all 26 episodes	2009-2011
Dynasty Warriors 7 (Video Game) Jia Xu / Xiahou Ba (English version, voice, uncredited)	2011
Rio: Rainbow Gate (TV Series) Elvis - Rainbow Gate (2011) ... Elvis (voice) - Speculation (2011) ... Elvis - Joker (2011) ... Elvis - Gate Holder (2011) ... Elvis	2011
Wolverine (TV Mini-Series) Hideki Kurohagi / Agent Takagi - Wolf Eyes (2011) ... Hideki Kurohagi (English version, voice) - Kurohagi (2011) ... Hideki Kurohagi (English version, voice) - Shingen (2011) ... Hideki Kurohagi (English version, voice) - Hell Road (2011) ... Hideki Kurohagi (English version, voice) - Koh (2011) ... Hideki Kurohagi (English version, voice)	2011

Show all 12 episodes

Disgaea 4: A Promise Unforgotten (Video Game) Nemo (English version, voice)	2011
Fallout: Nuka Break (Short) Merchant / Narrator	2011
Level E (TV Series) Prince Baka Ki El-Dogura - An Alien on the Planet (2011) ... Prince Baka Ki El-Dogura (English version, voice)	2011
Iron Man (TV Series) Zodiac Soldiers / Man in Car / Operator / ... - Iron Will (2010) ... Zodiac Soldiers (English version, voice) - Girl (2010) ... Man in Car (English version, voice) - The Arc Station Infection (2010) ... Operator (English version, voice) - Reunion (2010) ... Righella (English version, voice)	2010
Dragon Ball: Raging Blast 2 (Video Game) Broly / Burter (English version, voice)	2010
Sonic Colors (Video Game) E-123 Omega - DS Only (English version, voice)	2010
Panty & Stocking with Garterbelt (TV Series) Male Student B / Oscar the Snot - Akuma no Yo na Onnatachi (2010) ... Male Student B (English version, voice) - Hanamuputora/Vomittingu Puinto (2010) ... Oscar the Snot (voice)	2010
Ys: The Oath in Felghana (Video Game) Antonio / Bob / Father Jean Pierre (voice)	2010
Naruto Shippûden: Ultimate Ninja Storm 2 (Video Game) Nagato (English version, voice)	2010
H.A.W.X.2 (Video Game) Additional Voices (voice)	2010
Sengoku Basara: Samurai Heroes (Video Game) Tenkai (English version, voice)	2010
Hetalia: Axis Powers - Paint It, White! Greece (English version, voice)	2010
Starship Farragut - The Animated Episodes (TV Mini-Series) Shealar / Medical Assistant #1 - The Needs of the Many (2010) ... Shealar (voice) - Power Source (2009) ... Medical Assistant #1 (voice)	2009-2010

Trigun: Badlands Rumble Blue-Shirted Ladies Man / Additional Voices (English version, voice)	2010
Star Trek Online (Video Game) Isaac Garrett / Somat (voice)	2010
Ar Tonelico Qoga: Kneil of Ar Ciel (Video Game) Luphan (English version, voice, uncredited)	2010
Vandal Hearts: Flames of Judgment (Video Game) Tobias Martin / Toroah the Messiah (voice)	2010
Naruto Shippûden: Ultimate Ninja Heroes 3 (Video Game) Obito Uchiha / Sound Ninja B (English version, voice)	2009
Samurai Warriors 3 (Video Game) Mitsuhide Akechi / Yoshimoto Imagawa (English version, voice, uncredited)	2009
A Certain Scientific Railgun (TV Series) Trick - Majoriti ripôto (2009) ... Trick (English version, voice)	2009
Kamen Rider: Dragon Knight (Video Game) Kamen Rider Spear (voice)	2009
Hexyz Force (Video Game) Additional Voices (English version, voice)	2009
Dragon Ball: Raging Blast (Video Game) Broly (English version, voice)	2009
Dragon Ball Z Kai (TV Series) Burter - Son Goku Finally Arrives! Knock the Ginyu Special-Squad Around (2009) ... Burter (English version, voice) - The Hellish Rikuum! Keep Me Entertained, Vegeta-chan (2009) ... Burter (English version, voice) - The Special-Squad's Frontline Man! Break Gurudo's Spell (2009) ... Burter (English version, voice) - The Super Decisive Battle Draws Near! The Ginyu Special-Squad Has Arrived! (2009) ... Burter (English version, voice)	2009
Disgaea Infinite (Video Game) Mao (English version, voice, uncredited)	2009
Persona 3 Portable (Video Game) Junpei Iori	2009
League of Legends (Video Game) Malzahar / Lee Sin (voice)	2009

Charger Girl Ju-den Chan (TV Series)

Additional Voices

2009

- Faito! Ippatsu! (2009) ... Additional Voices (English version, voice)
 - Yôkeikai! Hôden chan! (2009) ... Additional Voices (English version, voice)
 - Purezento!? (2009) ... Additional Voices (English version, voice)
 - Kansashitsu tokumubu Rôden chan! (2009) ... Additional Voices (English version, voice)
 - Mucha to yasashisa (2009) ... Additional Voices (English version, voice)
- Show all 12 episodes

MagnaCarta 2 (Video Game)

2009

Additional Voices (English version, voice)

Naruto Shippûden: The Movie 3: Inheritors of the Will of Fire

2009

Obito Uchiha (English version, voice)

Genesis of Aquarion (TV Series)

2005-2009

Johannes

- The Day the World Began (2009) ... Johannes (English version, voice)
 - Gates of Heaven (2009) ... Johannes (English version, voice)
 - Wings, Far Away (2009) ... Johannes (English version, voice)
 - Sound of an Angel's Feather (2009) ... Johannes (English version, voice)
 - Shining Shadows (2009) ... Johannes (English version, voice)
- Show all 6 episodes

OVA Utawarerumono: Bôrô no komoriuta (Video short)

2009

Benawi (English version, voice)

Chrome Shelled Regios (TV Series)

2009

Lintens Savoled Hadens

- Taidou suru toshi (2009) ... Lintens Savoled Hadens (English version, voice)
 - Igunashisu no kakera (2009) ... Lintens Savoled Hadens (English version, voice)
 - Muteki no soukaku toshi gurendan semaru (2009) ... Lintens Savoled Hadens (English version, voice)
 - Ubawareta ferî (2009) ... Lintens Savoled Hadens (English version, voice)
 - Toshi senzenya (2009) ... Lintens Savoled Hadens (English version, voice)
- Show all 24 episodes

Soul Eater (TV Series)

2008-2009

Death Scythe

- Aikotoba ha yûkii (2009) ... Death Scythe (English version, voice)
 - Ichi ka bachi ka?! Kami wo koeru otoko tachi?- (2009) ... Death Scythe (English version, voice)
 - Buki (desusaizu) wo motta Shinigami-sama. Chotto saki ha yami darake? (2009) ... Death Scythe (English version, voice)
 - Takeshi ka shura ka. Kessen, Mifune vs. Burakku Sutâ? (2009) ... Death Scythe (English version, voice)
 - Saigo no madôgu. Buki nashi kiddo no Misshon Inpossiburu? (2009) ... Death Scythe (English version, voice)
- Show all 26 episodes

<p>Skip Beat! (TV Series) Yukihito Yashiro</p> <ul style="list-style-type: none"> - Soshite tobira wa hirakareru (2009) ... Yukihito Yashiro (voice) - Sono kontakuto wa yurusareru (2009) ... Yukihito Yashiro (voice) - Hikareta hikigane (2009) ... Yukihito Yashiro (voice) - Sekai ga kowareta hi (2009) ... Yukihito Yashiro (voice) - Shikaku o motsu mono (2009) ... Yukihito Yashiro (voice) <p>Show all 25 episodes</p>	2008-2009
<p>Tsubasa Chronicle: Spring Thunder (Video) Fay (English version, voice)</p>	2009
<p>A Very Special FUNimation Christmas (Short) Vic Mignogna</p>	2008
<p>Vampire Knight Guilty (TV Series) Zero Kiryu</p> <ul style="list-style-type: none"> - Vampire's Knight (2008) ... Zero Kiryu (English version, voice) - The End of the World (2008) ... Zero Kiryu (English version, voice) - The Two Lifes ~Soul~ (2008) ... Zero Kiryu (English version, voice) - The Overture of Battle ~Prelude~ (2008) ... Zero Kiryu (English version, voice) - Revival of the Mad King ~Emperor~ (2008) ... Zero Kiryu (English version, voice) <p>Show all 13 episodes</p>	2008
<p>ChäoS;HEAD (TV Series) The General / Additional Voices</p> <ul style="list-style-type: none"> - Shimei (2008) ... The General (English version, voice) - Jiritsu (2008) ... Additional Voices (English version, voice) - Senrei (2008) ... The General (English version, voice) - Kyozeitsu (2008) ... The General (English version, voice) - Rendou (2008) ... The General (English version, voice) <p>Show all 8 episodes</p>	2008
<p>Bleach: Fade to Black, I Call Your Name Ikkaku Madarame (English version, voice)</p>	2008
<p>Crained (Short) Foreman (voice)</p>	2008
<p>Casshern Sins (TV Series) Additional Voices</p> <ul style="list-style-type: none"> - Unmei to no saikai (2008) ... Additional Voices (English version, voice) - Tsuki toiu na no taiyou o koroshi ta otoko (2008) ... Additional Voices (English version, voice) - Horobi no tenshi (2008) ... Additional Voices (English version, voice) - Sekai wa dan matsu no koe ni michi te (2008) ... Additional Voices (English version, voice) 	2008

Dragon Ball Z: Infinite World (Video Game) Brolly (English version, voice)	2008
Code Geass: Lelouch of the Rebellion (TV Series) Luicano Bradley - Kôtei shikkaku (2008) ... Luicano Bradley (English version, voice) - Uragiri (2008) ... Luicano Bradley (English version, voice) - Dainiji Tôkyô taisen (2008) ... Luicano Bradley (English version, voice) - Tsuchi no aji (2008) ... Luicano Bradley (English version, voice) - Chôgasshûkoku ketsugi daiichigô (2008) ... Luicano Bradley (English version, voice)	2008
Shin Chan (TV Series) Biker Bastard - An Angel Gets Its Period (2008) ... Biker Bastard (voice)	2008
Vampire Knight (TV Series) Zero Kiryu / Ichiru Kiryu - Deep Crimson Chain (2008) ... Zero Kiryu / Ichiru Kiryu (English version, voice) - Pure-Blood Oath (2008) ... Zero Kiryu / Ichiru Kiryu (English version, voice) - Compensation of Desire (2008) ... Zero Kiryu / Ichiru Kiryu (English version, voice) - Princess of Darkness (2008) ... Zero Kiryu / Ichiru Kiryu (English version, voice) - Crimson Eyes (2008) ... Zero Kiryu / Ichiru Kiryu (English version, voice) Show all 13 episodes	2008
Dragon Ball Z: Burst Limit (Video Game) Brolly (English version, voice)	2008
Bamboo Blade (TV Series) Additional Voices - "Since Then" and "From Here on Out" (2008) ... Additional Voices (voice) - Kendo and What it Brings About (2008) ... Additional Voices (voice) - The Sword and the Way (2008) ... Additional Voices (voice) - Lie and Silence (2008) ... Additional Voices (voice) - Winners and Losers (2008) ... Additional Voices (voice) Show all 26 episodes	2007-2008
Armored Core: For Answer (Video Game) (voice, uncredited)	2008
Gunslinger Girl: Il Teatrino (TV Series) Bergonzi - A Day in the Life of Claes (2008) ... Bergonzi (English version, voice)	2008
Disgaea 3: Absence of Justice (Video Game) Mao (English version, voice, uncredited)	2008
Yggdra Union: We'll Never Fight Alone (Video Game) Russell / Nessiah (English version, voice, uncredited)	2008

<p>Nodame kantâbire (TV Series) Additional Voices</p> <ul style="list-style-type: none"> - Episode #1.23 (2007) ... Additional Voices (English version, voice) - Episode #1.22 (2007) ... Additional Voices (English version, voice) - Episode #1.21 (2007) ... Additional Voices (English version, voice) - Episode #1.20 (2007) ... Additional Voices (English version, voice) - Episode #1.19 (2007) ... Additional Voices (English version, voice) <p>Show all 23 episodes</p>	2007
<p>Star Ocean: First Departure (Video Game) T'nique Arcana (English version, voice)</p>	2007
<p>Bleach the Movie 2: The Diamond Dust Rebellion Ikkaku Madarame (English version, voice)</p>	2007
<p>Soulcalibur Legends (Video Game) Iska Farkas (English version, voice, uncredited)</p>	2007
<p>Tsubasa: Tokyo Revelations (Video) Fay (English version, voice)</p>	2007
<p>Doraemon (TV Series) Evil Gadget Guy / Newscaster</p> <ul style="list-style-type: none"> - Taifu no fu-ko (2007) ... Evil Gadget Guy / Newscaster (English version, voice) 	2007
<p>Dragon ball Z: Budokai Tenkaichi 3 (Video Game) Broly (English version, voice)</p>	2007
<p>D.Gray-man (TV Series) Akuma Clown / Alphonse Clouse</p> <ul style="list-style-type: none"> - Kimyou na yakata (2007) ... Alphonse Clouse (English version, voice) - Komoriuta wo kikasete (2006) ... Akuma Clown (English version, voice) - Tsuchiokina to kuya no aria (2006) ... Akuma Clown (English version, voice) - Martel no borei (2006) ... Akuma Clown (English version, voice) 	2006-2007
<p>Naruto Shippûden: The Movie Yomi (English version, voice)</p>	2007
<p>Lucky Star (TV Series) Camera Boy A / Michael / Gamers Clerk / ...</p> <ul style="list-style-type: none"> - Ringu (2007) ... Camera Boy A (English version, voice) - Ikinari wa kawarenai (2007) ... Michael (English version, voice) - Hitotsu yane no shita (2007) ... Gamers Clerk (English version, voice) - Oishii hi (2007) ... Boy B (English version, voice) 	2007
<p>Darker Than Black: Gemini of the Meteor (TV Series) Itzahk</p> <ul style="list-style-type: none"> - A Heart Unswaying on the Water's Surface Part 2 (2007) ... Itzahk (English version, voice) 	2007

- A Heart Unswaying on the Water's Surface Part 1 (2007) ... Itzahk (English version, voice)	2007
Devil May Cry (TV Series) Additional Voices	
- Rolling Thunder (2007) ... Additional Voices (English version, voice)	
- Devil May Cry (2007) ... Additional Voices (English version, voice)	
Stigma of the Wind (TV Series) Takeya Oogami	2007
- The One Who Discarded Her Hesitation (2007) ... Takeya Oogami (English version, voice)	
- Return of the Wind (2007) ... Takeya Oogami (English version, voice)	
The Mightiest Disciple Kenichi (TV Series) Kensei Ma	2006-2007
- What Fear, Seig! Prelude for Destruction (2007) ... Kensei Ma (English version, voice)	
- The Assault Commander Joins In! Restaurant Scuffle (2007) ... Kensei Ma (English version, voice)	
- Hard vs. Soft! The Siblings Quarrel After the Long Separation (2007) ... Kensei Ma (English version, voice)	
- The Mask Removed! Hermit's Real Identity (2007) ... Kensei Ma (English version, voice)	
- Protect to the Death Kenichi! Miu's Lips (2007) ... Kensei Ma (English version, voice)	
Show all 29 episodes	
Shin Megami Tensei: Persona 3 FES (Video Game) Junpei Iori (English version, voice, uncredited)	2007
Ohedo Rocket (TV Series) Tetsuju	2007
- Midori ni shibareta gin no kitsune (2007) ... Tetsuju (English version, voice)	
- Otoko wa matte ita (2007) ... Tetsuju (English version, voice)	
- Ôedo ni saku akai hibana (2007) ... Tetsuju (English version, voice)	
Murder Princess (Video short) Falís' Father (English version, voice)	2007
The Wallflower (TV Series) Takenaga Oda	2006-2007
- Redi he no michi (2007) ... Takenaga Oda (English version, voice)	
- Taifû no me, meisô suru (2007) ... Takenaga Oda (English version, voice)	
- Taifû no me, kitaku suru (2007) ... Takenaga Oda (English version, voice)	
- Hitsuji no kawa wo kabutta ôji sama (2007) ... Takenaga Oda (English version, voice)	
- Sepia iro no omoide (2007) ... Takenaga Oda (English version, voice)	
Show all 25 episodes	
Ghost Slayers Ayashi (TV Series) Iwami / Nishinomono / Namigoro Nankai / ...	2006-2007
- Fantasy of the Latter Southern Dynasty (2007) ... Iwami (English version, voice)	
- To End on a Starry Night (2007) ... Nishinomono (English version, voice)	

<ul style="list-style-type: none"> - Ikingiyô (2006) ... Namigoro Nankai (English version, voice) - Hana edo anyû (2006) ... Master of Arms Shop (English version, voice) - Yôji, kitaru (2006) ... Townsman (English version, voice) 	2007
<p>Dragon Ball Z: Shin Budokai - Another Road (Video Game) Broly (English version, voice)</p>	2007
<p>5 Centimeters Per Second (English version, voice)</p>	2007
<p>Bleach: Dark Souls (Video Game) Ikkaku Madarame (English version, voice)</p>	2007
<p>.hack//G.U. Vol.3//Redemption (Video Game) IYOTEN (English version, voice, uncredited)</p>	2007
<p>Flag (TV Series) Hacker</p> <ul style="list-style-type: none"> - Yami no naka no hikari (2006) ... Hacker (English version, voice) - Kurayami no sokyokusen (2006) ... Hacker (English version, voice) 	2006
<p>Fullmetal Fantasy (Short) Fanboy</p>	2006
<p>Bleach: Memories of Nobody Ikkaku Madarame / Mue (English version, voice)</p>	2006
<p>Bleach: Shattered Blade (Video Game) Ikkaku Madarame (English version, voice)</p>	2006
<p>Kekkaishi (TV Series) Yoshimori Sumimura</p> <ul style="list-style-type: none"> - The Best Cake in the World (2006) ... Yoshimori Sumimura (English version, voice) - Blooms of Karasumori (2006) ... Yoshimori Sumimura (English version, voice) - The Sweet Ghost (2006) ... Yoshimori Sumimura (English version, voice) - Her Treasure (2006) ... Yoshimori Sumimura (English version, voice) - The Beautiful Demon Tamer (2006) ... Yoshimori Sumimura (English version, voice) <p>Show all 7 episodes</p>	2006
<p>Reservoir Chronicle: Tsubasa (TV Series) Fay D. Flourite</p> <ul style="list-style-type: none"> - The Wings of Tomorrow (2006) ... Fay D. Flourite (English version, voice) - Freezing Mitama (2006) ... Fay D. Flourite (English version, voice) - The Group's Determination (2006) ... Fay D. Flourite (English version, voice) - The Distorted Wish (2006) ... Fay D. Flourite (English version, voice) - Feather King Chaos (2006) ... Fay D. Flourite (English version, voice) <p>Show all 52 episodes</p>	2005-2006

009-1 (TV Series) Egg / Priest - Hâdo boirudo (2006) ... Egg (English version, voice) - Sen'nyûsha tachi (2006) ... Priest (English version, voice)	2006
Dragon Ball Z: Budokai Tenkaichi 2 (Video Game) Broly (English version, voice)	2006
Project Sylpheed (Video Game) Katana Faraway (English version, voice)	2006
Innocent Venus (TV Series) Jin Tsurusawa - Sôshitsu (2006) ... Jin Tsurusawa (English version, voice) - Sakubô (2006) ... Jin Tsurusawa (English version, voice) - Bôsô (2006) ... Jin Tsurusawa (English version, voice) - Rendan (2006) ... Jin Tsurusawa (English version, voice) - Shûrai (2006) ... Jin Tsurusawa (English version, voice) Show all 8 episodes	2006
Ouran High School Host Club (TV Series) Tamaki Suou - Kore ga oretachi no ouran sai (2006) ... Tamaki Suou (English version, voice) - Host bu kaisan sengen (2006) ... Tamaki Suou (English version, voice) - Soshite kyôya wa deatta (2006) ... Tamaki Suou (English version, voice) - Tamaki no mujikaku na yûtsu (2006) ... Tamaki Suou (English version, voice) - Mori senpai ni deshi iri shigan (2006) ... Tamaki Suou (English version, voice) Show all 26 episodes	2006
Air Gear (TV Series) Sora Takeuchi - It's Finally the End. (2006) ... Sora Takeuchi (English version, voice) - I'll Cut Off the Shackle of Thorns! (2006) ... Sora Takeuchi (English version, voice, uncredited) - Trick: 14 (2006) ... Sora Takeuchi (English version, voice) - What Do You Mean by Icarus' Wings? I'll Show You My Talent, Rika-nee (2006) ... Sora Takeuchi (English version, voice)	2006
Time Crisis 4 (Video Game) Wild Fang (English version, voice, uncredited)	2006
Ghost Train Zombie 5 (English version, voice)	2006
Shin Megami Tensei: Persona 3 (Video Game) Junpei Iori (English version, voice, uncredited)	2006

Atelier Iris 3: Grand Phantasm (Video Game) Edge Vanhite (English version, voice, uncredited)	2006
The Melancholy of Haruhi Suzumiya (TV Series) Yutaka Tamaru <ul style="list-style-type: none"> - Kotô shôkôgun: Kôhen (2006) ... Yutaka Tamaru (English version, voice) - Kotô shôkôgun: Zenpen (2006) ... Yutaka Tamaru (English version, voice) 	2006
Utawarerumono (TV Series) Benawi / Additional Voices <ul style="list-style-type: none"> - Mori no musume (2006) ... Benawi (English version, voice) - Modorenu michi (2006) ... Benawi (English version, voice) - Murasaki kohaku (2006) ... Benawi (English version, voice) - Manekarezarumono (2006) ... Additional Voices (English version, voice) 	2006
Fullmetal Alchemist: Premium Collection (Video) Edward Elric (English version, voice)	2006
Dragon Ball Z: Shin Budokai (Video Game) Brolly (English version, voice)	2006
Oroshite Musical Nerima Daikon Brothers (TV Series) Additional Voices / Kakuhamama <ul style="list-style-type: none"> - Ore no de kanadete! Uttaete! (2006) ... Kakuhamama (English version, voice) - Ore no ura uranai (2006) ... Additional Voices (English version, voice, as Obi Frostips) - Ore no wo korogase No.1 (2006) ... Additional Voices (English version, voice, as Obi Frostips) - Ore no karakuri de kai de shô (2006) ... Additional Voices (English version, voice, as Obi Frostips) - Ore no ochûsha oshiri ni kurasshu (2006) ... Additional Voices (English version, voice, as Obi Frostips) Show all 7 episodes	2006
Mushi-Shi (TV Series) Kisuke <ul style="list-style-type: none"> - Inside the Cage (2006) ... Kisuke (English version, voice) 	2006
Ar Tonelico: Melody of Elemia (Video Game) Radolf Schnaizen (English version, voice, uncredited)	2006
Shuffle! (TV Series) Forbesh / Forbeshi / Forebesh <ul style="list-style-type: none"> - Soshite... Taisetsu na koto (2006) ... Forbesh (English version, voice) - Atarashii asu he (2005) ... Forbesh (English version, voice) - Tori modoshita mono (2005) ... Forbesh (English version, voice) - Rikorisu (2005) ... Forbesh (English version, voice) - Shayô no ie (2005) ... Forebesh (English version, voice) Show all 14 episodes	2005-2006

<p>MÄR: Märchen Awakens Romance (TV Series) Alibaba / John Peach</p> <ul style="list-style-type: none"> - War game kaishi! (2005) ... John Peach (English version, voice) - Watashi, make nai yo! Kazan gun no sunou!! (2005) ... Alibaba (English version, voice) - Otoko o miseru ze Jakkū! Mahou no kinoko!! (2005) ... Alibaba (English version, voice) - Okure te ki ta otoko! Aran!! (2005) ... Alibaba (English version, voice) 	2005
<p>Paradise Kiss (TV Series) Suguru Hayasaka - Older</p> <ul style="list-style-type: none"> - Future (2005) ... Suguru Hayasaka - Older (English version, voice) - Stage (2005) ... Suguru Hayasaka - Older (English version, voice) - Rose (2005) ... Suguru Hayasaka - Older (English version, voice) - Designer (2005) ... Suguru Hayasaka - Older (English version, voice) - Tokumori (2005) ... Suguru Hayasaka - Older (English version, voice) <p>Show all 12 episodes</p>	2005
<p>Suzuka (TV Series) Team Captain</p> <ul style="list-style-type: none"> - Shissō (2005) ... Team Captain (English version, voice) - Gekirei (2005) ... Team Captain (English version, voice) - Kitai (2005) ... Team Captain (English version, voice) - Kōkai (2005) ... Team Captain (English version, voice) - Ōen (2005) ... Team Captain (English version, voice) <p>Show all 20 episodes</p>	2005
<p>Dragon Ball Z: Budokai Tenkaichi (Video Game) Brolly (English version, voice)</p>	2005
<p>Trinity Blood (TV Series) Virgil Walsh - Count of Manchester</p> <ul style="list-style-type: none"> - The Throne of Roses II. The Refuge (2005) ... Virgil Walsh - Count of Manchester (English version, voice) - The Throne of Roses I. Kingdom of the North (2005) ... Virgil Walsh - Count of Manchester (English version, voice) 	2005
<p>Gekijouban Tsubasa kuronikuru: Torikago no kuni no himegumi (Short) Fai (English version, voice)</p>	2005
<p>Fullmetal Alchemist the Movie: Conqueror of Shamballa Edward Elric (English version, voice)</p>	2005
<p>Monster (TV Series) Gustav Milch</p> <ul style="list-style-type: none"> - Escape (2005) ... Gustav Milch (English version, voice) 	2005
<p>Air (TV Series) Yukito Kunitasaki / Sky</p> <ul style="list-style-type: none"> - Sôshûhen (2005) ... Yukito Kunitasaki / Sky (English version, voice) 	2005

- Sora 'air' (2005) ... Yukito Kunisaki / Sky (English version, voice)
 - Umi 'sea' (2005) ... Yukito Kunisaki / Sky (English version, voice)
 - Hikari 'light' (2005) ... Yukito Kunisaki / Sky (English version, voice)
 - Hane 'plume' (2005) ... Yukito Kunisaki (English version, voice)
- Show all 11 episodes

Synesthesia

Konno (English version, voice) 2005

Dragon Ball Z: Sagas (Video Game)

Broly (English version, voice) 2005

Jinki: Extend (TV Mini-Series)

Kalis 2005

- The Silver-winged Visitor (2005) ... Kalis (English version, voice)
- Fulfilled Ambition (2005) ... Kalis (English version, voice)

Air: The Motion Picture

Yukito Kunisaki (English version, voice) 2005

Xenosaga: The Animation (TV Series)

Wilhelm 2005

- Awakening (2005) ... Wilhelm (English version, voice)

Gravion Zwei (TV Series)

Raven 2004

- Beni no kiba (2004) ... Raven (English version, voice)
- Tamashii no daiika (2004) ... Raven (English version, voice)
- Sô sei ki (2004) ... Raven (English version, voice)
- Taiyô no honô (2004) ... Raven (English version, voice)
- Jûryoku ga otoroeru toki (2004) ... Raven (English version, voice)

Show all 12 episodes

Mezzo DSA (TV Series)

Mugiyama / Additional Voices 2004

- Yume no Kara (2004) ... Mugiyama (English version, voice)
- Shiko no Kara (2004) ... Mugiyama / Additional Voices (English version, voice)
- Genso no Kara (2004) ... Mugiyama / Additional Voices (English version, voice)
- Fuko no Kara (2004) ... Additional Voices (English version, voice)
- Curses no Kara (2004) ... Mugiyama (English version, voice)

Show all 9 episodes

Shinobi: The Law of Shinobi

Rokkaku (English version, voice) 2004

Dragon Ball Z: Budokai 3 (Video Game)

Broly (English version, voice) 2004

Holly's Story (Video) Jim Hudson, Holly's Father	2004
Rozen Maiden (TV Series) Madam Pearl - Mercury-Lampe (2004) ... Madam Pearl (English version, voice)	2004
Tactics (TV Series) Sugino (2008)	2004
Fullmetal Alchemist (TV Series) Edward Elric - Laws and Promises (2004) ... Edward Elric (English version, voice) - Death (2004) ... Edward Elric (English version, voice) - The Other Side of the Gate (2004) ... Edward Elric (English version, voice) - Goodbye (2004) ... Edward Elric (English version, voice) - Sealing the Homunculus (2004) ... Edward Elric (English version, voice) Show all 51 episodes	2003-2004
Yu Yu Hakusho: Dark Tournament (Video Game) Bui (voice)	2004
Fullmetal Alchemist 2: Curse of the Crimson Elixir (Video Game) Edward Elric (English version, voice, as Vic Mignonia)	2004
Madlax (TV Series) Carrossea Doon - True Fight 'Wish' (2004) ... Carrossea Doon (English version, voice) - Target Book 'Holy' (2004) ... Carrossea Doon (English version, voice) - Gun Rhyme 'Moment' (2004) ... Carrossea Doon (English version, voice) - Awakening Sound 'Awake' (2004) ... Carrossea Doon (English version, voice)	2004
Midori Days (TV Series) Shiori's Dad - DAYS 6: Shiori no raburabu daisakusen (2004) ... Shiori's Dad (English version, voice, as Vic Filetoftomorrow)	2004
Cromartie High School (TV Series) Sushi Chef's Son - Gorilla Sushi (2004) ... Sushi Chef's Son (English version, voice)	2004
Yugo the Negotiator (TV Series) Additional Voices / Lall - Warrior ... Lall (English version, voice) - Contact ... Lall / Additional Voices (English version, voice) - Decision ... Additional Voices (English version, voice) - The Negotiator ... Additional Voices (English version, voice)	2004

Divergence Eve: Misaki Chronicles (TV Series) Samurai (English version, voice)	2004
Kino's Journey (TV Series) Male Examiner / The King / Comrade B / ... - The Tower Country (2003) ... Man In His 30s / Male Examiner / The King / ... (English version, voice) - A Kind Land (2003) ... Groom (English version, voice) - Her Journey (2003) ... Hypnotist (English version, voice) - The Country of Books (2003) ... Comrade B (English version, voice) - Coliseum: Part 2 (2003) ... The King (English version, voice) Show all 8 episodes	2003
Peace Maker Kurogane (TV Series) Tatsunosuke Ichimura (English version, voice)	2003
Fullmetal Alchemist and the Broken Angel (Video Game) Edward Elric (English version, voice)	2003
Full Metal Panic? Fumoffu (TV Series) Kurz Weber - Jingi naki fyanshī (2003) ... Kurz Weber (English version, voice)	2003
D.N. Angel (TV Series) Dark - With Rutile... (2003) ... Dark (English version, voice) - The Temple of Neptune (2003) ... Dark (English version, voice)	2003
RahXephon: The Motion Picture - Pluralitas Concentio (TV Movie) Mamoru Torigai (English version, voice)	2003
Mousou Kagaku Series Wandaba Style (TV Series) Station Manager - Purojekuto Shidou! (2003) ... Station Manager (English version, voice)	2003
Kaleido Star (TV Series) Master Linn, Ian, Investor, Arlon Brass, Additional Voices (English version, voice)	2003
E's Otherwise (TV Series) Dzhyuma - Kyoshoku no heion (2003) ... Dzhyuma (English version, voice)	2003
Kiddy Grade (TV Series) Dextera - As Time Goes by (2003) ... Dextera (English version, voice) - Annihilation/Zero (2003) ... Dextera (English version, voice) - Take/Revenge (2003) ... Dextera (English version, voice) - Phantasm/Reborn (2003) ... Dextera (English version, voice) - Unmasked Face (2003) ... Dextera (English version, voice)	2002-2003

Show all 6 episodes

2000-2003

One Piece: Wan pīsu (TV Series)

Captain Nezumi / Wetton

- Soshite Densetsu ga Hajimaru! Iza Niji no Kanata e (2003) ... Wetton (English version, voice)
- Ransen Hisshi! Wetton no Yabou to Niji no Tou (2003) ... Wetton (English version, voice)
- Furusato e no Omoi! Dasshutsu Funou no Kaizoku Hakaba! (2003) ... Wetton (English version, voice)
- Eien no Kuni no Juunin! Pumpkin Kaizokudan! (2003) ... Wetton (English version, voice)
- Gyojin Teikoku no Owari! Nami wa Ore no Nakama Da! (2000) ... Captain Nezumi (English version, voice)

Show all 9 episodes

2002

Unlimited Saga (Video Game)

Mythe / Armand (English version, voice)

2002

No Manners

Dan Goon Leader / Student Bow A / Adult Passerby (English version, voice)

2002

Gravion (TV Series)

Raven (English version, voice)

2002

Yesterday

Jo (English version, voice)

2002

Full Metal Panic! (TV Series)

Sgt. Kurz Weber

- The Rising Wind in the Homeland: Part 1 (2002) ... Sgt. Kurz Weber (English version, voice)
- Kiddo nappu (2002) ... Sgt. Kurz Weber (English version, voice)
- Ranjeri panikku (2002) ... Sgt. Kurz Weber (English version, voice)
- I Want to Protect You (2002) ... Sgt. Kurz Weber (English version, voice)
- The Worrisome Guy Is a Sergeant (2002) ... Sgt. Kurz Weber (English version, voice)

2002

2009: Lost Memories

Saigo (English version, voice)

2002

RahXephon (TV Series)

Mamoru Torigai

- First Movement: Invasion of the Capital/Overlord (2002) ... Mamoru Torigai (English version, voice)

2002

Dark Water

Kono (English version, voice)

2002

Aquarian Age: Sign for Evolution (TV Series)

Shingo Hirota

- Fire-Green Premonition (2002) ... Shingo Hirota (English version, voice)
- Deep-Blue Overture (2002) ... Shingo Hirota (English version, voice)
- Pure-White Embrace ... Shingo Hirota (English version, voice)
- Faded-Red Conflict ... Shingo Hirota (English version, voice)
- Indigo-Green Vortex ... Shingo Hirota (English version, voice)

Show all 13 episodes

2001

Najica: Blitz Tactics (TV Series)

Police Officer, MC, Employee, Additional Voices (English version, voice)

2001

Angelic Layer (TV Series)

Host / Additional Voices / Host Arisu

- Tenshi no tsubasa yo! watashi to hikaru wo izanatte (2001) ... Host (English version, voice)
- Reach Misaki! This Thought Goes Over the Rainbow! (2001) ... Host (English version, voice)
- Break into the Magical Wall!/Misaki vs Ohjirou (2001) ... Host (English version, voice)
- Suddenly Just the Two of Us. Secret Double Dates (2001) ... Host (English version, voice)
- The Enemy Is Ichan?/Stuttering Second Match (2001) ... Host (English version, voice)

Show all 19 episodes

2001

Gensoumaden Saiyuki: Requiem (Video)

Kougaiji (English version, voice)

2001

Super GALS! (TV Series)

Kouichi Akagi / Good looking guy

- Mami-rin, Dreamy-Eyed, Her First Love (2001) ... Kouichi Akagi (English version, voice)
- Odaiba, Crackling, Great Final Battle! (2001) ... Good looking guy (English version, voice)

2001

Noir (TV Series)

Wellman, Domenic, Heinz, Additional Voices (English version, voice)

2001

Sister Princess (TV Series)

Additional Voices

- Boku no guradyuëshon (2001) ... Additional Voices (English version, voice)

2001

Ghost Stories (TV Series)

Da Vinci

- The Picture that Swallows People - Da Vinci (2001) ... Da Vinci (English version, voice, as Obi Frostips)

1999-2000

Initial D: Second Stage (TV Series)

Shingo Shoji

- Eight-Six vs. Eight-Six (2000) ... Shingo Shoji (English version, voice)
- Changing Seasons (2000) ... Shingo Shoji (English version, voice)
- The Seal Is Broken (2000) ... Shingo Shoji (English version, voice)
- The New Eight-Six (1999) ... Shingo Shoji (English version, voice)
- The Eight-Six Turbo! (1999) ... Shingo Shoji (English version, voice)

Show all 13 episodes

2000

Sin: The Movie (Video)

Tim Perko (voice)

2000

Escaflowne: The Movie

Dune / Folken Fanel (FUNimation dub) (English version, voice)

Detective Conan: Captured in Her Eyes

Tobias (English version, voice) 2000

Gensomaden Saiyuki (TV Series)

Kougaiji (English version, voice) 2000

A.D. Police: To Protect and Serve (TV Series)

Additional Voices / Bad Guy A 1999

- Conviction (1999) ... Additional Voices (English version, voice)

- Memory (1999) ... Additional Voices (English version, voice)

- Bloodstains (1999) ... Additional Voices (English version, voice)

- Strategy (1999) ... Bad Guy A (English version, voice)

- Bargaining (1999) ... Additional Voices (English version, voice)

Show all 8 episodes

Gasaraki (TV Series)

Additional Voices / General Okawa / Engineer, Additional Voices / ... 1998-1999

- Gasara (1999) ... Additional Voices (English version, voice)

- Kutôtên (1999) ... General Okawa / Additional Voices (English version, voice)

- Muma (1999) ... General Okawa / Additional Voices (English version, voice)

- Gonke (1999) ... Additional Voices (English version, voice)

- Shissô (1999) ... Additional Voices (English version, voice)

Show all 17 episodes

Excel Saga (TV Series)

Wolf 1999

- Elegy to the Dogs (Menchi's Great Adventure) (1999) ... Wolf (English version, voice)

Steel Angel Kurumi (TV Series)

Main Bully (English version, voice) 1999

Gamera 3: Revenge of Iris

Doctor / Male Anchor A (English version, voice) 1999

Sorcerous Stabber Orphen (TV Series)

Lai / Cox 1998-1999

- Snake in the Temple (1999) ... Lai (English version, voice)

- The Relic, Part 2 (1998) ... Cox (English version, voice)

- Azalie (1998) ... Lai (English version, voice)

All Purpose Cultural Cat Girl Nuku Nuku DASH! (TV Mini-Series)

Young President 1998

- Hametsu no Yokan (1998) ... Young President (English version, voice)

- Suzu no Oto, Too! Oto (1998) ... Young President (English version, voice)

- Koukai no Hate ni (1998) ... Young President (English version, voice)

- Hito to Kikai wo Tsunagu mono (1998) ... Young President (English version, voice)

- Saraba Nukunuku (1998) ... Young President (English version, voice)

<p>Initial D (TV Series) Shingo Shoji</p> <ul style="list-style-type: none"> - New Downhill Legend (1998) ... Shingo Shoji (voice) - Last Battle! (1998) ... Shingo Shoji (voice) - Akina's Superstar (1998) ... Shingo Shoji (voice) - Downhill Rain Battle (1998) ... Shingo Shoji (voice) - Severe Uphill Climb (1998) ... Shingo Shoji (voice) <p>Show all 26 episodes</p>	1998
<p>Generator Gawl (TV Series) Gawl</p> <ul style="list-style-type: none"> - Raihōsha (1998) ... Gawl (English version, voice) 	1998
<p>Spriggan Arcam Security 1 / Additional Voices (English version) (English version, voice)</p>	1998
<p>Martian Successor Nadesico - The Motion Picture: Prince of Darkness Araragi / Hokushin's Six A (English version, voice)</p>	1998
<p>Princess Nine (TV Series) Hiroki Takasugi</p> <ul style="list-style-type: none"> - Wave Motion Swing! (1998) ... Hiroki Takasugi (English version, voice) - Welcome Seira! (1998) ... Hiroki Takasugi (English version, voice) - In My Father's Footsteps (1998) ... Hiroki Takasugi (English version, voice) - A Baseball Team at a Prestigious Girl's School? (1998) ... Hiroki Takasugi (English version, voice) - Hayakawa Ryo, Age 15 (1998) ... Hiroki Takasugi (English version, voice) 	1998
<p>All Purpose Cultural Cat Girl Nuku Nuku (TV Mini-Series) Juza Mishima / Hell Mishima</p> <ul style="list-style-type: none"> - Nuku Nuku Forever! We Won't Forget Your Smile! (1998) ... Juza Mishima / Hell Mishima (English version, voice) - Diary of Nuku Nuku's Youth! All-Purpose Cultural Musical! (1998) ... Juza Mishima / Hell Mishima (English version, voice) - Nuku Nuku in Love! Who Is Her Valentine? (1998) ... Juza Mishima / Hell Mishima (English version, voice) - Nuku Nuku Wanders! A Happy New Year! I Was Dumped! (1998) ... Juza Mishima / Hell Mishima (English version, voice) - Nuku Nuku and Ryunosuke! It Was a Very Alligator Night! (1998) ... Juza Mishima / Hell Mishima (English version, voice) <p>Show all 14 episodes</p>	1998
<p>Detective Conan (TV Series) Ernie Bower / Nathan Greene / Kenyan / ...</p> <ul style="list-style-type: none"> - Holmes Freak Murder Case: Part 2 (1997) ... Ernie Bower (English version, voice) - Holmes Freak Murder Case: Part 1 (1997) ... Ernie Bower (English version, voice) - The Oja Ocean Sunfish Murder Case (1997) ... Nathan Greene (English version, voice) - The Victory Flag Vandalism Case (1996) ... Kenyan (English version, voice) - Murder at the Local Diner (1996) ... Steve Wilson (English version, voice) 	1996-1997

Show all 8 episodes

1996

Martian Successor Nadesico (TV Series)

Ikeda, Additional Voices (English version, voice)

1996

Escaflowne (TV Series)

Folken

- Eternal Love (1996) ... Folken (English version, voice)
- The Zone of Absolute Fortune (1996) ... Folken (English version, voice)
- Choosing Fate (1996) ... Folken (English version, voice)
- Sign of a Storm (1996) ... Folken (English version, voice)
- The Black Winged Angel (1996) ... Folken (English version, voice)

Show all 23 episodes

Neon Genesis Evangelion (TV Series)

Shigeru Aoba (2004 Director's Cut) / Shigeru Aoba

1995-1996

- Sekai no Chuushin de Ai o Sakenda Kemono (1996) ... Shigeru Aoba (2004 Director's Cut) (English version, voice)
- Do You Love Me? (1996) ... Shigeru Aoba (2004 Director's Cut) (English version, voice)
- Namida (1996) ... Shigeru Aoba (2004 Director's Cut) (English version, voice)
- Don't Be (1996) ... Shigeru Aoba (2004 Director's Cut) (English version, voice)
- Angel Attack (1995) ... Shigeru Aoba (English version, voice)

Super Dimensional Fortress Macross (TV Series)

Hikaru Ichijo

1982-1995

- Satan's Dolls (1995) ... Hikaru Ichijo (voice)
- Yasashisa Sayonara (1983) ... Hikaru Ichijo (voice)
- Romanesque (1983) ... Hikaru Ichijo (voice)
- Private Time (1983) ... Hikaru Ichijo (voice)
- Rainy Night (1983) ... Hikaru Ichijo (voice)

Show all 36 episodes

1995

Street Fighter II: V (TV Series)

Vega (ADV Films dub)

- The Despot's Commander (1995) ... Vega (ADV Films dub) (English version, voice)
- The Unveiled Ruler (1995) ... Vega (ADV Films dub) (English version, voice)
- The Clash of the Titans (1995) ... Vega (ADV Films dub) (English version, voice)
- The Bloodthirsty Prince (1995) ... Vega (ADV Films dub) (English version, voice)

Yu Yu Hakusho: Ghost Files (TV Series)

Bui / Ura Urashima / Additional Voices / ...

1993-1994

- Kakusei no Toki! Batoru Futatabi (1994) ... Bui / Ura Urashima (English version, voice)
- Kyukyoku Ougi! Hoero Kokuryuha (1993) ... Bui (English version, voice)
- Kyo! Yoroi o Hazushi Ta Bui (1993) ... Bui (English version, voice)
- Shukumei no Taiketsu! Toguro no Kage (1993) ... Additional Voices (English version, voice)
- Yami Aitemu · Shide no Hagoromo (1993) ... Additional Voices (English version, voice)

Show all 8 episodes

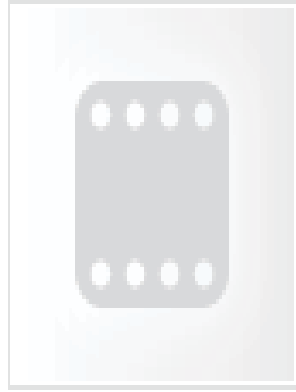
- Dragon Ball Z: Bio-Broly**
Bio-Broly (English version, voice) 1994
- Dragon Ball Z: Broly - Second Coming**
Broly (English version, voice) 1994
- Dragon Ball Z: Broly - The Legendary Super Saiyan**
Broly (English version, voice) 1993
- Sailor Moon** (TV Series)
Additional Voices
- Yuki yo yama yo yūjō yo! Yappari yōma mo yo (1992) ... Additional Voices (English version, voice) 1992
- All Purpose Cultural Cat Girl Nuku Nuku** (TV Series short)
Guy Outside School, Manager Soldier (English version, voice) 1992
- Original Dirty Pair: Flight 005 Conspiracy** (Video)
Dornschtern (ADV dub) (English version, voice) 1990
- Saint Seiya** (TV Series)
Jabu (English version, voice) 1986
- Megazone 23 Part II: Please Give Me Your Secret** (Video)
Shogo Yahagi (ADV Films dub) (English version, voice) 1986
- Dirty Pair: Mystery of Norlandia** (Video)
Sheriff (ADV 2003) (English version, voice) 1985
- Twice Given** 1985
- Megazone 23** (Video)
Shogo Yahagi (ADV Films dub) (English version, voice) 1985
- Aura Battler Dunbine** (TV Series)
Tokamk Robskiy, Neal Given (English version, voice) 1983
- Gatchaman** (TV Series)
Additional Voice / Additional Voices / French Representative / ...
- Ikari ni moeta Gacchaman (1973) ... Galactor Spy (English version, voice)
- Saraba, Reddo Imparusu (1973) ... French Representative (English version, voice)
- Hakkotsu kyōryū Dorakodon (1973) ... Maid / Additional Voice (English version, voice)
- Girochin tetsujō kamisorāru (1973) ... Captain / Additional Voice (English version, voice)
- Majin Gyarakku Ekkusu (1973) ... Boxing Announcer / Additional Voice (English version, voice)
Show all 17 episodes

Music department (2 credits) [Show](#)

Sound department (3 credits) [Show](#)

Writer (4 credits)	Show ▾
Producer (5 credits)	Show ▾
Director (5 credits)	Show ▾
Editor (5 credits)	Show ▾
Soundtrack (2 credits)	Show ▾
Miscellaneous Crew (2 credits)	Show ▾
Set decorator (1 credit)	Show ▾
Second Unit Director or Assistant Director (1 credit)	Show ▾
Composer (1 credit)	Show ▾
Thanks (4 credits)	Show ▾
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Archive footage (1 credit)	Show ▾

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Personal Details

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Other Works: [Free! Eternal Summer Rin](#)

Official Sites: [Official Site](#)

Alternate Names: [Vic Filetoftomorrow](#) | [Obi Frostips](#) | [Vic Mignona](#) | [Vic Mignonia](#)

Height: 5' 10" (1.78 m)

Did You Know?

[Edit](#)

Personal Quote: There is no question that knowing someone in the business will get you in the door. But it is your skill that will keep you in the room. [See more](#) »

Trivia: Loves Milky Way Dark candy bars. [See more](#) »

Trademark: An emotional resonance is always heard in the tone of his voice during dramatic scenes [See more](#) »

Star Sign: [Virgo](#)

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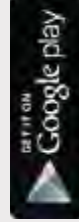
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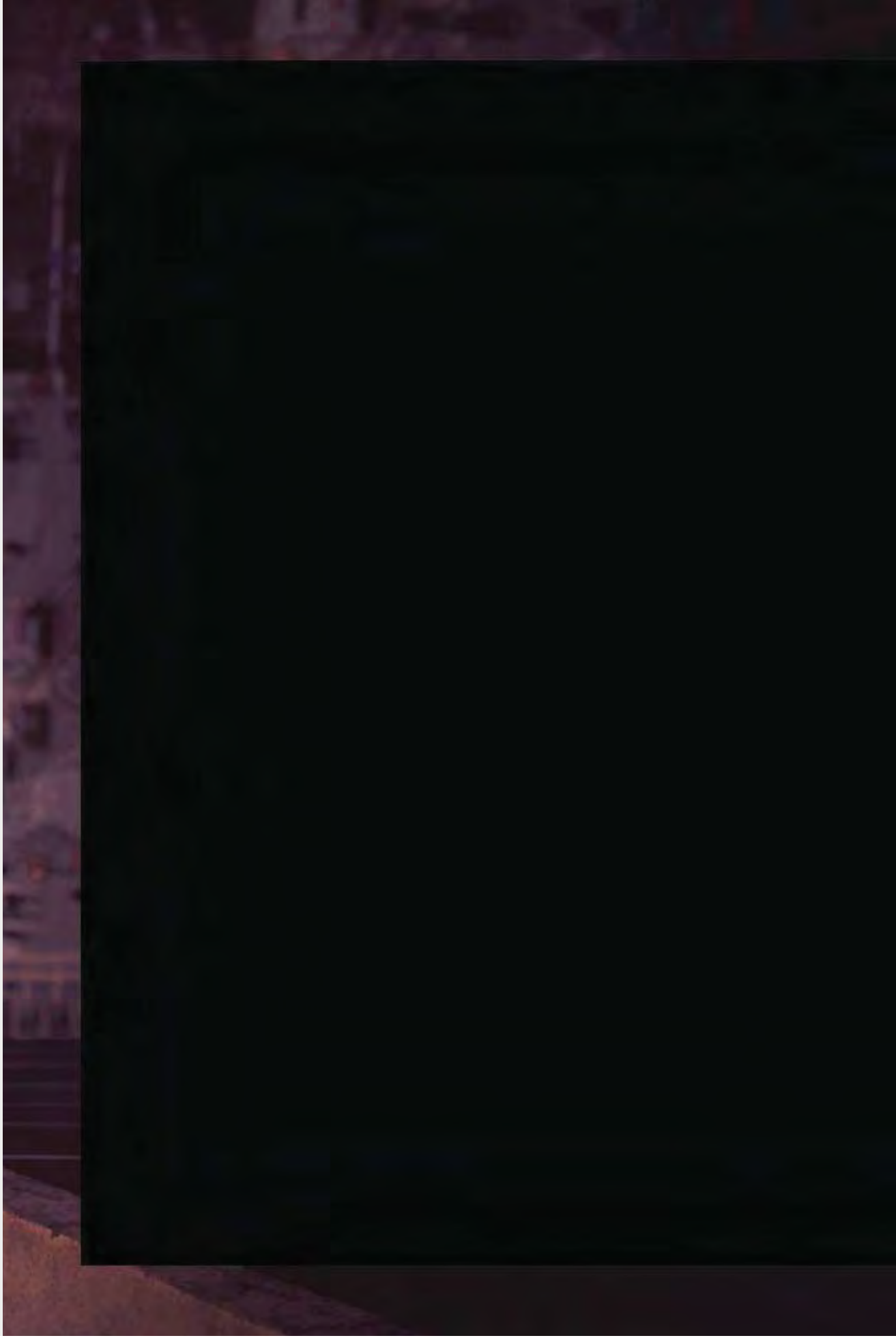
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Well well well.....long time [[May, 4th, 2008 | 05:35 pm](#)]

[**Time Out! I feel...** | energetic]

What a football draft.....ZOWIE.....Ben spoke and the suits listened....got him a BIG receiver as the first pick.....we are gonna have a great season.....

Mandy and I did our thing on his honor at the Seattle con.....great time was had by all.....the Fuhrer is SOOOOOO easy to sneak up on(S).....Mandy called him on the phone as the Ranger panel was starting.....he said.....HERE SAY HI TO THE RANGERS(S).....and out we walked from a side entrance.....it was wonderful.....and the house

was full. The Risebool Rangers know how to come to a convention.....glad to have seen you all and we will do it again.....infact we are already scheming(S).....lots of Ranger Lobve to you all.....

GET CARDS and MORE RANGERS(S).....Matriarch

[link](#)

[Go For It!!](#)

Tandukocon

[Nov. 11th, 2007 | **09:57 pm**]

[**Time Out! I feel...** | 😊grateful!]

Well, what a Sunday.....wonderful time at the con, Steelers win, raisins lose.....been a good weekend all around.....

I met some new Rangers, met up with some OLD Rangers(S).....not in age understand just have known them for a while.....and a good time was had by all. Three great panels on Sat.....all the VA that were invited were involve in the first one.....then the RISEMBOOL RANGERS we on the map for the secomd one.....my gosh how many kids were at the Risebool panel and you got ON THE SCHEDULE.....then Vic's autograph session was great.....hope everyone that wanted a card got one.....they sold out fast(S).....Aaron got one year older and we all celebrated at The Bannana Leaf.....GOOD FOOD.....Those are just the highlites of my time there, other Rangers will post a more definitive log I am sure.....I enjoy so much seeing the kids have clean fun and to be a part of it is very special....You are all very special and you make me feel special as well.....thanks for my gifts(S).....Matriarch

[link](#)

4 Touchdowns! [Go For It!!](#)

Mini UPDATE

[May. 6th, 2007 | **09:10 pm**]

Well been a while since I updated this journal.....Since the last post Mandy and I graced Tekkoshokon with our presence.....haha.....There was a Ranger dinner arranged and set up by Britt(aka Justyouraverage.....)



We had a great time.....The Rangers brought all kinds of gifts and we had a surprise party for Vic.....a good time was had by all.....Next stop.....Otakon!!!!

Matriarch

[link](#)

[3 Touchdowns](#) | [Go For It!!](#)

FMA.....VIC WIN!!!!

[Feb. 24th, 2007 | **11:52 pm**]

And the winners are...

Best Cast: Fullmetal Alchemist

Best Manga: Fruits Basket

Best Actor in a Comedy: Dave Wittenberg

Best Actor in a Comedy: Debbi Derryberry

Best Anime Theme Song: "Rewrite," Asian Kung Fu Generation

Best Anime Feature: Final Fantasy VII: Advent Children

Best Package Design: Fullmetal Alchemist

Best Anime Comedy: FLCL

Best Actress: Mary Elizabeth

Best Actor: Vic Mignogna

Best Short Series: FLCL

Best Long Series: Fullmetal Alchemist



[link](#)

3 Touchdowns | [Go For It!!](#)

American Anime Awards

[Feb. 23rd, 2007] **10:15 pm**

Well tomorrow will be the presentations at Comicon New York.....I am excited.....Matriarch

[link](#)

1 Touchdown | [Go For It!!](#)

Vic makes the cut in the American Anime Awards Finals!!!

[Feb. 7th, 2007] **11:47 pm**

The top five finalists for the first American Anime Awards are as follows:

Best Actor

Johnny Yong Bosch (Akira, Bleach, Eureka 7)

Crispin Freeman (Hellsing Ultimate, Noein, Revolutionary Girl Utena)

Richard Hayworth (Rurouni Kenshin)
Yuri Lowenthal (Naruto)
Vic Mignogna (Fullmetal Alchemist, Macross)
Best Actress
Luci Christian (Princess Tutu)
Susan Dalian (Naruto)
Mary Elizabeth (Ghost in the Shell: Stand Alone Complex 2nd GIG)
Maile Flanagan (Naruto)
Michelle Ruff (Bleach, Lupin the 3rd)
Best Actor in a Comedy
Greg Ayres (Negima, Nerima Daikon Brothers)
Johnny Yong Bosch (Akira)
Liam O'Brien (Comic Party, DNA Squared, Girls Bravo)
Tony Oliver (Lupin III)
Dave Wittenberg (Zatch Bell)
Best Actress in a Comedy
Laura Bailey (Kodocha)
Luci Christian (Desert Punk, Negima, Nerima Daikon Brothers)
Debi Derryberry (Zatch Bell)
Hillary Haag (Paniponi Dash)
Michelle Ruff (Lupin the 3rd)
Best Cast
FLCL

Fullmetal Alchemist

Ghost in the Shell: Stand Alone Complex 2nd GIG

Inuyasha

Naruto

Best DVD Package Design

Bleach Vol. 1

Final Fantasy VII: Advent Children

Fullmetal Alchemist

Hellsing Ultimate 1-Limited Edition Steelcase

Naruto Uncut Box Set Vol. 1

Best Anime Theme Song

Asterisk (Bleach)

Heart of Sword-Yoake Mae (Rurouni Kenshin)

Rewrite (Fullmetal Alchemist)

Ride on Shooting Star (FLCL)

Rise (Ghost in the Shell: Stand Alone Complex 2nd GIG)

Best Comedy Anime

Ah! My Goddess TV

FLCL

Kodocha

Ranma 1/2

Tenchi Muyo OVA

Best Anime Feature

Akira

Final Fantasy VII: Advent Children
Fullmetal Alchemist-The Movie
Inuyasha Movie 4: Fire on Mystic Island
Pokemon Movie 8: Lucario and the Mystery of Mew
Best Short Series
Elfen Lied
FLCL
Gravitation TV
Hellsing Ultimate
Ranma 1/2 OAV
Best Long Series
Fullmetal Alchemist
Inuyasha
Naruto
Rurouni Kenshin
Samurai Champloo
Best Manga
Bleach
Death Note
Fruits Basket
Naruto
Neon Genesis Evangelion: Angelic Days

The American Anime Awards ceremony will take place during the evening of Saturday February 24 at the New Yorker Hotel in Midtown

Manhattan. In attendance will be executives and creative personnel from every major anime studio and manga publisher active in the United States.

The American Anime Awards ceremony will be hosted by a group of the most prominent voice actors in the business, including Christine Auten, Jessica Boone, Shelley Calene-Black, Luci Christian, Alice Fukks, Hilary Haag, Taylor Hannah, and Serena Varghese. These "Babes of Anime" will be dressed in designs by Project Runway winner Chloe Dao, who will be on hand during the awards ceremony to present the award for Best Package Design. Many more actors, directors, and celebrities will be participating in the awards ceremony and the post-awards gala that follows.

Tickets to the ceremony and gala are sold out, but fans can enjoy both through a special broadcast event on Anime Network. American Anime Awards will premiere on Anime Network March 23 (broadcast) and April 12 (VOD). The two-hour program will include pre- and post-ceremony coverage and will feature the inaugural award ceremony, where anime professionals will be recognized for their outstanding achievements in the multi-billion dollar anime industry.

[link](#)

[4 Touchdowns](#) | [Go For It!!](#)

Vic's PostOp Status

[Dec. 23rd, 2006|03:20 pm]

Yesterday(Friday) the Fuhrer got a great report from the orthopedic surgeon, NO MORE CRUTCHES.....walked out of the office and is coming along nicely. Now for the regimented exercises and rehab so he can again be the Leader of the RiseemboolRangers Champion DODGE BALL team.....Beautiful weather in Houston, enjoying my visit.....Talk again soon everyone.....Matriarch

[link](#)

[6 Touchdowns](#) | [Go For It!!](#)

Almost Christmas

[Dec. 11th, 2006|12:09 am]

[[Field Position](#) | [Home](#)]
 [[Time Out! I feel...](#) |  happy]
 [[Huddling Music](#) | [At Calvary](#)]

Hi everyone, I will be going to Houston to spend Christmas with Vic.....First time I have seen him since Mandy, Miss Helen and I surprised him in SF.....be a great time. Jesus birthday, dont you just wish people would stop calling it xmas.....it is Christs Birthday. CHRISTMAS.....have a good holiday and be thankful for family and good health.....As Vic's Gramps would say, Jesus Bless You, Matriarch

[link](#)[7 Touchdowns](#) [Go For It!!](#)[Sep. 30th, 2006 | **11:36 pm**]

b_k_myers's LJ
stalker is
piscesmaiden!

LiveJournal Username:

Who is your LJ Stalker Friend?

LJ Stalker Finder
From [Go-Quiz.com](#)

[link](#)[2 Touchdowns](#) [Go For It!!](#)[Yikes a cell phone](#)[Sep. 30th, 2006 | **11:21 pm**]

[[Time Out! I feel...](#) |  thankful]
[[Huddling Music](#) | At Calvary]

Where was this new cell phone when you were sleeping in the airport in San Fran and I was fretting about how to find you??? We had a great time, I should have posted prior to this but time has a way.....etc etc etc

Glad you have moved up in the world....talk soon.....B

[link](#)[1 Touchdown](#) [Go For It!!](#)[navigation](#)

[[viewing](#) | most recent entries]
[[go](#) | earlier]

JSL DEC.
EXHIBIT 8

Accused of Sexual Harassment, Vic Mignogna Sues Fanimation

By [LIZ LANIER](#)

APRIL 19, 2019 8:41AM PT





CREDIT: ROB LATOUR/SHUTTERSTOCK

Vic Mignogna, known for voicing Broly in the “Dragon Ball” series of games, films, and tv shows, filed a lawsuit claiming defamation and other charges against Funimation and other voice actors on Thursday, according to public court documents.

Fellow Funimation voice actors Monica Rial and Jamie Marchi, along with Rial’s fiance Ronald Toye, are also named in the suit. Mignogna’s suit stated that he is suing for interference in other work contracts and that the charges made against him accusing him of sexual harassment are false, and affected his career due to not only Funimation’s decision to no longer work with him, but conventions also canceled his appearances. Mignogna and his lawyer, Ty Beard of Beard Harris Bullock Hughes, are seeking “monetary relief over \$1,000,000.00” in addition to other relief to which Mignogna “may be justly or equitably entitled.”

In January, accusations of sexual harassment and homophobia surfaced against Mignogna. Funimation ended its relationship with the voice actor a month later. A popular anime convention attendee, he was accused of sexual harassment by fans, in the form of hugging and kissing without consent. Some of the con attendees who said this happened were underage, and allegations go back as far as 2008. Some voice actors have also spoken out against Mignogna publicly. Marchi detailed her own encounter with Mignogna, and Rial stated that she was also sexually harassed by Mignogna.

Twitter posts by Rial, Marchi, and Toye may now be used as evidence for the lawsuit, with the lawsuit saying that the exposure the actors and Toye (noted as a "either a Funimation agent or employee" in the court documents) provided to accusations against Mignogna via tweeting and retweeting caused the matter to "go viral." "One or more" of the defendants then "actively" defamed Mignogna to conventions, according to the court document.

Mignogna, perhaps best known for voicing Ed in "Fullmetal Alchemist," developed a large fan following as a result of his voice work in numerous anime shows, films, and video games. He denied the allegations on his Twitter in a statement in January, calling the accusations "heartbreaking."

"I would also like to sincerely apologize to anyone who ever felt my interaction with them (a hug or a kiss on the cheek or forehead) was crossing a line," he wrote. "Never in a million years would it be my intent to make anyone feel uncomfortable."

Funimation did not respond to *Variety's* request for comment. The official court document for *Victor Mignogna v Funimation* is available below.



2019 Emmy Noms: Snubs and Surprises

HBO dominated the 2019 Emmy nominations, while broadcast TV falls further behind. Here are the snubs and surprises from th...



66

[LEAVE A REPLY](#)

[FULLMETAL ALCHEMIST](#)

[FUNIMATION](#)

[ROOSTER TEETH](#)

[RWBY](#)

[SONY](#)

[SONY PICTURES ENTERTAINMENT](#)

[VIC MIGNOGNA](#)

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Hilton CMO Kellyn Smith Kenny is passionate about driving innovation in marketing, including supporting data-driving advertising and highlighting the brand's connected hotel room offering.

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EXHIBIT Q

Vic Mignogna Timeline

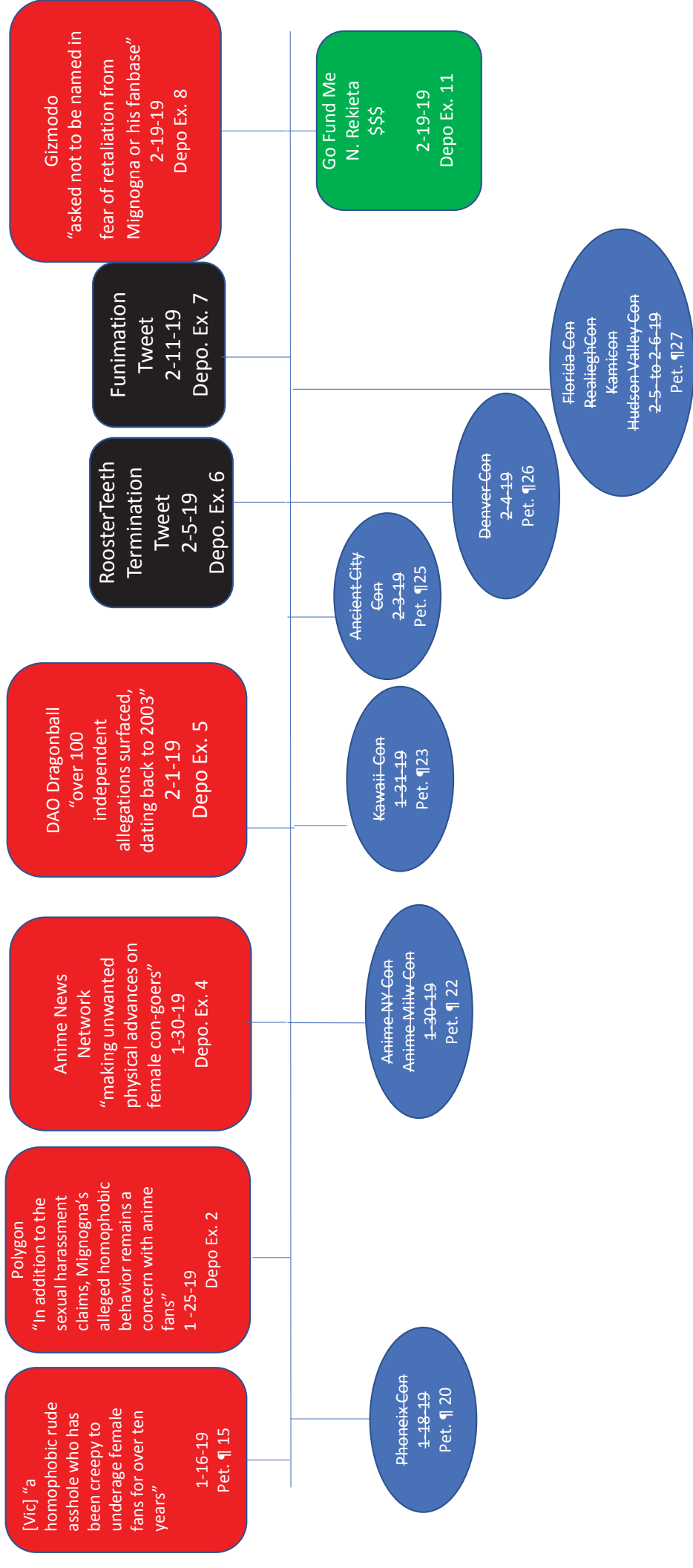


EXHIBIT R

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

V.

FUNIMATION PRODUCTIONS, LLC,
MONICA RIAL, RONALD TOYE, and
JAMIE MARCHI

Defendants.

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§
§

IN THE DISTRICT COURT

141st JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

DECLARATION OF MONICA RIAL

1. My name is Monica Rial. I am of sound mind, competent and authorized to make this declaration, the statements of which are within my personal knowledge, true, and correct.

2. Attached to the deposition of Vic Mignogna as Exhibits 12 and 13 are true and correct copies of email exchanges between and among myself, Chuck Huber, and Jamie Marchi on March 6, 2019.

3. Since Plaintiff filed this lawsuit, Ron Toye and I have been harassed by Plaintiff's supporters. I have been a victim of doxing by his fans online on a website called Kiwi Farms. Kiwi Farms is a website that is known for encouraging the harassment, bullying, and stalking of individuals. Information about where I live, my date of birth, and other information about me has been posted on Kiwi Farms in attempts to incite others to stalk, bully, harass, and intimidate me. Plaintiff's fans have contacted us directly, sending us emails and calling our places of employment. I believe Plaintiff and his supporters intend to intimidate us, and make our lives so difficult that we will capitulate to his demands.

My name is Monica Rial. My date of birth is October 5, 1975, and my address is 614 Ridgedale Drive, Richardson, Texas 75080. I declare under penalty of perjury that the foregoing is true and correct, and within my personal knowledge.

Executed on July 18, 2019.

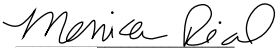

Monica Rial

EXHIBIT S

Case	Jurisdiction	Topic	Case/Statute/Rule?	Relevance	Cited In	LOOK UP	Fix Citation
Goughnour v. Patterson 2019	Texas	Ooops Beard's partner got sanctioned	LOL	Bad Lawyering			
Preston Gate LP v. Bukaty, 249 S.W.3d 892, 898 (Tex. 2008)	Texas	Civil conspiracy cannot exist without an u	Case	Civil Conspiracy			
McKinley v. Baden, 777 F. 2d 1017 - Court of Appeals, 5th Circuit	5th Cir.	Sullivan applies to non-press	Case	Defamation			
Anderson v Liberty Lobby	LOOK UP	Clear and convincing is the standard for e	Case	Defamation			
Maethner v. Someplace Safe, Inc. (Minn. 2019)	Minnesota	Defamation is also hard to prove in MN	Case	Defamation			
Dun & Bradstreet, Inc. v. Greenmoss Builders, Inc., 472 US 749 -	SCOTUS	Public concern and actual malice	Case	Defamation			
Gertz v. Robert Welch, Inc., 418 U.S. 323 (1974)	SCOTUS	opinions cannot be defamatory	Case	Defamation	Funi TCPA motion		
Hustler Magazine v. Falwell, 485 US 46 (1988)	SCOTUS	Parody is protected by 1A	Case	Defamation			
Letter Carriers v. Austin, 418 U.S. 264 (1974)	SCOTUS	rhetorical hyperbole protected by 1A	Case	Defamation			
Masson v New Yorker Magazine, 501 US 496 (1991)	SCOTUS	substantial truth doctrine	Case	Defamation			
New York Times Co. v. Sullivan, 376 U.S. 254 (1964)	SCOTUS	ACTUAL MALICE!!	Case	Defamation			
Rosenbloom v. Metromedia, Inc., 403 U.S. 29 (1971)	SCOTUS	limited pupose public figures	Case	Defamation			
St. Amant v. Thompson, 390 U.S. 727 (1968)	SCOTUS	Reckless Disregard	Case	Defamation			
Carr v Brasher, 776 S.W.2d 567 (Tex. 1989)	Texas	Burden in defamation is with plaintiff	Case	Defamation			
Casso v. Brand 776 S.W.2d 551 (Tex. 1989)	Texas	Jury disbelief is not enough (clear and co	Case	Defamation			
Hancock v. Variyam, 400 S.W.3d 59 (Tex 2013)	Texas	per se defamation= assumed damages	Case	Defamation			
Huckabee v. Time Warner, 19 S.W.3d 413, 420 (Tex. 2000)	Texas	Malice v. Actual Malice	Case	Defamation			
Lane v Phares, 544 S.W.3d 881, 886-87 (Tex App XXXX 2018)	Texas	Limited purpose public figure in TX	Case	Defamation	Funi TCPA motion		
McClure v Allied Stores of Tex Inc, 608 S.W.2d 901, 903 (Tex. 198	Texas	"Cause in fact"	Case	Defamation			
Rogers v Zanetti, 518 S.W.3d 394, 411 (Tex. 2017)	Texas	proving causation	Case	Defamation			
Turner v. KTRK Television, Inc., 38 S.W.3d 103,119 (Tex. 2000)	Texas	Standard for Pub. Fig. in TX is clear and i	Case	Defamation			
Van Der Linden v. Khan, 535 S.W.3d 179, 198-99 (Tex. App XXXX	Texas	Burden in defamation	Case	Defamation			
WFAA-TV Inc v McLemore, 978 S.W.2d 568 (Tex. 1998)	Texas	Burden in defamation is with plaintiff	Case	Defamation	Funi TCPA motion		
Bos v. Smith, 556 S.W.3d 293, 307-08 (Tex. 2018)	Texas	Damages and Cause-in-Fact	Case	Defamation			
Bird v WCW, 868 SW2d 767, 771 (Tex 1994)	Texas	Sworn statements cannot be defamatory	Case	Defamation			
Hill v Herald-Post Pub Co, 877 SW2d 774, 782-783 (Tex App El P	Texas	Sworn statements cannot be defamatory	Case	Defamation			
Civil Practice and Remedies Code 73.005	Texas	Truth is a defense to defamation	Case	Defamation			
1st Amendment to US Constitution	Constitution	Freedom of Press, Religion, Assembly, S	Statute?	Defamation			
TDMA	Texas	Gotta write weird letters	Statute	Defamation/Procedural			
8th Amendment to US Constitution	Constitution	Reading the Threadnought may be cruel	Statute?	Funny Lawyer Joke			
3rd Amendment to US Constitution	Constitution	@ing people and clogging mentions may be quartering	Statute?	Funny Lawyer Joke			
See Article VI, Clause 2 of the Constitution	Constitution	Where federal law exists it supercedes st	Statute?	How Laws Work			
Streber v Hunter, 221 F3d 701, 722 (5th Cir 2000)	5th Cir.	specialization and duty of care	Case	Legal Malpractice			
Cook v Irion, 409 S.W.2d 475, 478 (Tex Civ App San Antonio 196	Texas	localization rule	Case	Legal Malpractice in TX			
Cosgrove v Grimes, 774 S.W.2d 662, 665 (Tex. 1989)	Texas	legal malpractice	Case	Legal Malpractice in TX			
Parker v. Carnahan, 772 S.W.2d 151, 157 (Tex. App. Texark. 198	Texas	Implied Attorney-Client relationship	Case	Legal Malpractice in TX			
Perez v.Kirk & Carrigan, 822 S.W.2d 261, 265-66 (Tex. App. Corp. Texas	Texas	Implied Attorney-Client relationship	Case	Legal Malpractice in TX			
Rhodes v Batilla, 848 S.W.2d 833, 842 (Tex App Houston 1993, wi	Texas	specialization and duty of care	Case	Legal Malpractice in TX			
Tijerina v Wennermark, 700 S.W.2d 342, 347 (Tex App San Antoni	Texas	localization rule	Case	Legal Malpractice in TX			
https://www.legalethicstexas.com/Ethics_Resources/Rules/Texas-	Texas	Rules for Trial Publicity for Lawyers	Rule	Legal Malpractice in TX			
QBE Ins. Corp. v. Jorda Ent. Inc, 277 F.R.D. 676 (S.D.FI. 2012)	Florida	Rule 30(b)(6) depositions	Case	Not Directly Relevant			
Engblom v. Carey,	SCOTUS?	3rd Amendment	Case	Not Directly Relevant			
Mitchell v. Henderson	SCOTUS?	3rd Amendment	Case	Not Directly Relevant			
Texas SB194 "Hollis's Bill"	Texas	New statute about harrassment (does not	Statute	Not Directly Relevant			
Ashcroft v. Iqbal, 556 U.S. 662 (2009)	SCOTUS	Notice Pleading	Case	Procedural			
Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)	SCOTUS	Notice Pleading	Case	Procedural			
Crown Asset Management, LLC v. Loring 294 S.W.3d 841 - Tex: C	Texas	Notice Pleading in TX	Case	Procedural			
Texas Rules of Civil Procedure 193.2	Texas	Discovery rules about objections	Rule	Procedural			
Texas Rules of Evidence 405(a)(1) and 803(21)	Texas	reputation evidence as heresay	Rule	Procedural			
Texas Rules of Evidence 803 and 804	Texas	admissibility of heresay	Rule	Procedural			
McDonald Oilfield Operations, LLC v. 3B Inspection, LLC, No. 01-1	Texas	TCPA/motion for summary judgement	Case	SLAPP			
Youngkin v Hines, 546 S.W.3d 675 (Tex. 2018)	Texas	Breadth of TCPA	Case	SLAPP			
Tex. Civ.Prac. & Rem. Code § 27	Texas	Formal cite for TCPA	Statute	SLAPP	Funi TCPA motion		
https://statutes.capitol.texas.gov/Docs/CP/htm/CP.27.htm..._sectic	Texas	Awards in Anti-SLAPP motions	Statute	SLAPP			
Community for Creative Non-Violence v. Reid, 490 US 730, 740-4	SCOTUS	Work for hire law is not state specific	Case	Tortious Interference			
ACS Inv'rs, Inc. v. McLaughlin, 943 S.W.2d 426, 430 (Tex. 1997)	Texas	defining tortious interference in TX	Case	Tortious Interference			
Dall. Symphony Ass'n, Inc. v. Reyes, NO. 17-0835 (Tex. Mar. 8, 2	Texas	TI cannot exist without defamation	Case	Tortious Interference			
The Prudential Ins. Co. of America v. Financial Review Serv., Inc.,	Texas	Justification as defense for tortious interf	Case	Tortious Interfere	Funi TCPA motion		
Coinmach Corp. v. Aspenwood Apt. Corp., 417 S.W.3d 909, 923 (T	Texas	Elements required to prove tortious interf	Case	Tortious Interfere	Funi TCPA motion		
Texas Beef Cattle Co. v. Green, 921 S.W.2d 203, 211 (Tex. 1996)	Texas	Good faith argument can serve as justific	Case	Tortious Interference			
Hammerly Oaks, Inc. v. Edwards, 958 SW 2d 387, 391 (Tex 1997)	Texas	Respondeat Superior	Case	Tortious Interference			
Leshner v. Doescher, NO. 02-12-00360-CV (Tex. App. Oct. 10, 201	Texas	NOT SURE					
In re Lipsky,460 S.W.3d 579, 590 (Tex. 2015)	Texas	Clear and specific evidence required to o	Case	SLAPP	Funi TCPA motion		
Schoellkopf v. Pledger, 778 S.W.2d	LOOK UP	Civil conspiracy claims fail if underlying tc	Case	Civil Conspiracy	Nick on Twitter, Funi TCPA motion		
Greer v. Abraham, 489 SW3d 440 (Tex. 2016)	Texas	reckless disregard	Case	Defamation			

Case/Statute/Ru/ Jurisdiction		COUNTA of Cas
	Constitution	1
Total		1
Case	5th Cir.	2
	Florida	1
	LOOK UP	1
	Minnesota	1
	SCOTUS	10
	SCOTUS?	2
	Texas	22
Case Total		39
LOL	Texas	1
LOL Total		1
Rule	Texas	1
Rule Total		1
Statute	Texas	2
Statute Total		2
Statute?	Constitution	3
Statute? Total		3
Grand Total		47

Term	Definition	Source	Relevance
"Lolsuit"	Urban Dictionary	"Term of art" in 2	LOL

Twitter Handle	State/Country	Practice	Lawyer?
@NameRedacted	Australia		Solicitor
@NameRedacted	Britain		Barrister
@NameRedacted	Britain	Began practice in	Barrister
@NameRedacted	CA	1st Amendment,	Lawyer
@NameRedacted	CA		Law Grad
@NameRedacted	CA		Lawyer
@NameRedacted	CA		Lawyer
@NameRedacted	CA (?)	Defamation	Lawyer
@NameRedacted	Canada		Paralegal
@NameRedacted	Canada	Practiced in US (Lawyer
@NameRedacted	CO		Lawyer
@NameRedacted	CT (?)		Lawyer
@NameRedacted	CT/MA	1st Amendment	Lawyer
@NameRedacted	DC		Law Student
@NameRedacted	DC	Policy	Lawyer
@NameRedacted	FL	Estate, Taxes	Lawyer
@NameRedacted	Hong Kong	American corpora	Lawyer
@NameRedacted	IL	Appellate Crimin	Lawyer
@NameRedacted	IL		Lawyer
@NameRedacted	IL	1st Amendment (Lawyer
@NameRedacted	IL		Lawyer
@NameRedacted	IL	IP	Lawyer
@NameRedacted	IN (?)		Law Student
@NameRedacted	KY	Class action, civi	Lawyer
Screech	MN	Drunken Rage	LOLyer
@NameRedacted	MN		Lawyer
@NameRedacted	MN		Lawyer
@NameRedacted	MN		Lawyer
@NameRedacted	MN		Lawyer
@NameRedacted	MS	Family	Lawyer
@NameRedacted	NC	Defamation, Stre	Lawyer
@NameRedacted	NC		Lawyer
@NameRedacted	NC		Law Student
@NameRedacted	NC		Lawyer
@NameRedacted	NC	Cyber, Regulator	Lawyer
@NameRedacted	NJ		Lawyer
@NameRedacted	NY	IP	Lawyer
@NameRedacted	NY (?)		Lawyer
@NameRedacted	OH		Lawyer
@NameRedacted	OR	Appellate (Retire	Lawyer
@NameRedacted	OR		Lawyer
@NameRedacted	PA	1st Amendment (Lawyer

Twitter Handle	State/Country	Practice	Lawyer?
@NameRedacted	PA	not practicing	Law Grad
@NameRedacted	PA/DE		Lawyer
@NameRedacted	TN		Law Student
@NameRedacted	TN		Lawyer
@NameRedacted	TX		Lawyer
@NameRedacted	TX	Appellate, Person	Lawyer
@NameRedacted	TX		Law Librarian
@NameRedacted	TX		Lawyer
Percy	TX	Inability to Read	LOLyer
@NameRedacted	USA	IP	Lawyer
@NameRedacted	USA		Lawyer
@NameRedacted	USA	Criminal	Lawyer
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@NameRedacted	USA		Lawyer
@NameRedacted	USA		Lawyer
@NameRedacted	USA		Law Student
@NameRedacted	USA		Lawyer
@NameRedacted	USA		Lawyer
@NameRedacted	VA		Lawyer
@NameRedacted	VA		Lawyer
@NameRedacted	WI		Lawyer

<i>Lawyer?</i>	<i>State/Country</i>	<i>COUNTA of Twit</i>
Barrister	Britain	2
Barrister Total		2
Law Grad	CA	1
	PA	1
Law Grad Total		2
Law Librarian	TX	1
Law Librarian Total		1
Law Student	DC	1
	IN (?)	1
	NC	1
	TN	1
	USA	1
Law Student Total		5
Lawyer	CA	3
	CA (?)	1
	Canada	1
	CO	1
	CT (?)	1
	CT/MA	1
	DC	1
	FL	1
	Hong Kong	1
	IL	5
	KY	1
	MN	4
	MS	1
	NC	4
	NJ	1
	NY	1
	NY (?)	1
	OH	1
	OR	2
	PA	1
	PA/DE	1
	TN	1
	TX	3
	USA	14
	VA	2
	WI	1
Lawyer Total		55
LOLyer	MN	1
	TX	1
LOLyer Total		2

<i>Lawyer?</i>	<i>COUNTUNIQUE</i>
Barrister	1
Law Grad	2
Law Librarian	1
Law Student	5
Lawyer	26
LOLyer	2
Paralegal	1
Solicitor	1
Grand Total	29

Paralegal	Canada	1
Paralegal Total		1
Solicitor	Australia	1
Solicitor Total		1
Grand Total		69