



- Prepared for trial testimony. [REDACTED] previously undisclosed, clarifying, or different recollections/information below:



- Estimates speaking with JE 6 or more times on the phone; understood JE was [REDACTED] boss; when JE called, he would talk about how impressed he was [REDACTED] and wanted to help open doors for [REDACTED] wanted them to have opportunities like he provided for other students

- [REDACTED] remembers certain details more clearly than others; has had a lot going on in the past few years; not exactly sure on some dates

- When JE called [REDACTED] the first time, [REDACTED] remembers she was running the vacuum

- [REDACTED] understood that [REDACTED] was raising money for the trip to [REDACTED] JE also told [REDACTED] that he was contributing money to the trip

- [REDACTED] understood that JE helped a lot of students, was interested in helping students to get into other schools

- Approximately a couple of weeks between call and [REDACTED] trip to New Mexico

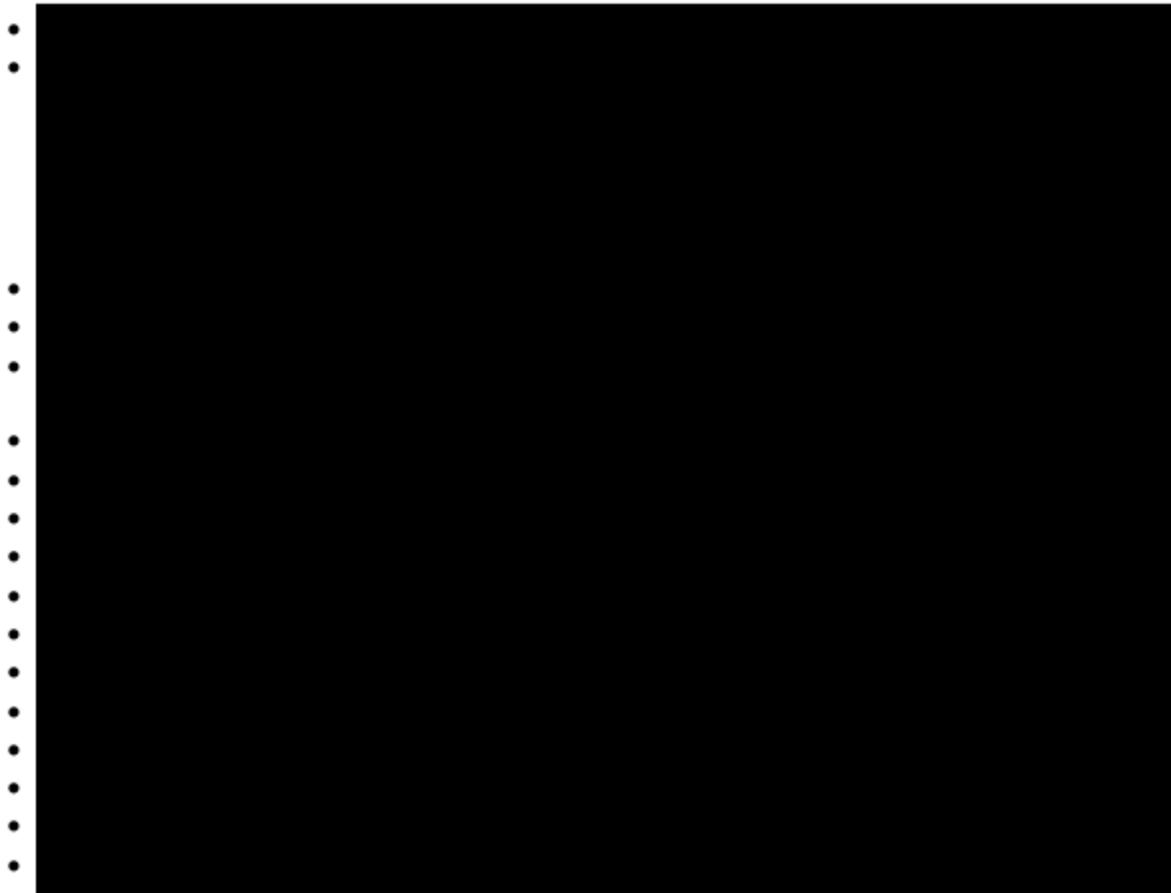
- JE told [REDACTED] that students would be staying in cabins in NM; JE told [REDACTED] that he wanted [REDACTED] to go to NM to join other students who were traveling abroad; [REDACTED] told him that she could not afford additional expenses; JE said he would be paying for all expenses for all the students

- [REDACTED] thinks [REDACTED] had not yet decided where she was going to go that summer; saw NM as an opportunity for her to get information from other students

- [REDACTED] had been to NM for some [REDACTED] had talked to [REDACTED] about that and shown her photos from NM; [REDACTED] thought trip to NM for [REDACTED] would be similar but for a different age group and for students looking to travel abroad



SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17



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