

EXHIBIT

A

Edgar County Watchdogs, Inc.

vs.

Bonnie Kurowski, IL Reporter, LLC.

Deposition of:

Bonnie Kurowski

February 16, 2022

Vol 01

PHIPPS REPORTING

Raising the Bar!

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

CASE NO.: 5:21-cv-302-JSM-PRL

EDGAR COUNTY WATCHDOGS, INC.,
KIRK ALLEN, JOHN KRAFT, AND
ALYSSIA BENFORD,

Plaintiffs,

Vs.

BONNIE KUROWSKI, IL REPORTER,
LLC, A FLORIDA LLC, FIGHT FOR
IL, INC. A FLORIDA
NOT-FOR-PROFIT CORPORATION, AND
ERIK PHELPS,

Defendants.

DEPOSITION OF
BONNIE KUROWSKI

VOLUME 1
Pages 1 through 293

Wednesday, February 16, 2022
10:05 a.m. - 6:16 p.m.

Phipps Reporting
305 Northeast First Street
Gainesville, Florida 32601

Stenographically Reported By
Sierra Scarnati
Stenographer

Job No.: 230171

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ALSO PRESENT: KIRK ALLEN, JOHN KRAFT, AND ALYSSIA
BENFORD, Plaintiffs.

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1 **have come up?**

2 A Possibly during that timeframe, you know,
3 when was when it was unknown, but I don't recall
4 that was a few years ago.

5 Q How long did take you to recover from the
6 **strokes?**

7 A About two years.

8 Q You said two years?

9 A Mhm.

10 Q So 2015 to 2017?

11 A Mhm.

12 Q So you were recovered in 2017; is that
13 **correct?**

14 A I don't recall exactly when.

15 Q Ms. Kurowski, how many bankruptcy
16 **petitions have you filed?**

17 A Two.

18 Q Did you just say two?

19 A Two.

20 Q Okay. As in not one, not three, but only
21 **two; correct?**

22 A Correct. One was in 2008 and one was
23 during my divorce a few years ago.

24 Q So if there's a third bankruptcy in the
25 **U.S. Bankruptcy Court system, that would not be**

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1 A Yes. I took in an immediate foster child
2 who was being abused. That was priority. He's
3 still my stepson today.

4 Q In the last 15 years, can you tell me whom
5 you've been employed by?

6 A Can you narrow that scope, please?

7 Q Okay. I'm asking you who were employed
8 by. Do you not understand?

9 A No, that's a lot. And that would recall a
10 lot of memory. As a contractor, that's a big
11 question. Can you narrow the scope?

12 Q Okay. So who was your last employer?

13 A My last employer or my current employer?

14 Q Okay. Here's what we're not going to do
15 I'm not going to answer questions and become the
16 witness here. All right? So who was your last --

17 A -- that will take me an hour for me to try
18 to figure that out.

19 Q -- who was your last employer?

20 A -- that would be Ares.

21 Q Ares. What is Ares?

22 A Ares is an IT company.

23 Q Where are they located?

24 A I don't know. I work virtual. I don't
25 have that information on me.

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1 Q Where did you report to work?

2 A What do you mean? I work from home.

3 Q Where is Ares headquartered out of?

4 A I don't know. I'm a new employee. I
5 would have to look that up.

6 Q So it's your current employer?

7 A Correct.

8 Q How long have you been employed by Ares?

9 A About nine months.

10 Q What is your title at Ares?

11 A A senior instructional designer.

12 Q For someone that doesn't know what a
13 senior instructional designer is, what does a senior
14 instructional designer do?

15 A Project management, change management, and
16 designing training.

17 Q And are you paid by Ares money in a form
18 of a paycheck?

19 A Yes.

20 Q How often are you paid?

21 A Biweekly.

22 Q When was last time you received a paycheck
23 from Ares?

24 A The 15th.

25 Q Who do you report to at Ares?

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1 A Can you explain the relevance of that?

2 Q No, I cannot. I'm asking a question.

3 A I'm choosing not to answer that.

4 MR. HANLON: Counsel, is that your
5 instruction for not to answer it.

6 MR. EDINGER: I have not provided her any
7 instructions.

8 BY MR. HANLON:

9 Q Ms. Kurowski, if I have to file a motion
10 to compel your answer, I'll ask the District Court
11 to tax to you the cost of my filing that motion to
12 compel you to answer that question. Do you want to
13 stick with that answer that you refused to answer?

14 A Yes, I'm refusing to answer because of
15 what your clients did to cost me my job previous to
16 that.

17 Q We're not here today about that.

18 A I understand.

19 Q So you worked for Ares for nine months
20 prior to today; correct?

21 A Correct.

22 Q Did you ever have any prior employment
23 with Ares?

24 A No.

25 Q Are you sure about that?

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1 A Yes.

2 Q Have you ever represented or held out to
3 anybody that you were employed by Ares prior to
4 those nine months?

5 A No.

6 Q When you applied for employment at JHT,
7 did you tell JHT that you had prior employment at
8 Ares?

9 A No.

10 Q Are you sure about that?

11 A Pretty sure. I worked for JHT before I
12 worked for Ares.

13 Q So there would be no reason for you to
14 have listed Ares on your application for employment
15 with JHT; correct?

16 A I do not recall.

17 Q So your immediate employer prior Ares was
18 JHT?

19 A Correct.

20 Q And what reason were you given by JHT for
21 the termination of your employment?

22 A I was told that the bad publicity put out
23 there about them would cost them government
24 contracts which fund their business.

25 Q They had done --

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1 A -- and they couldn't risk that.

2 Q -- who told you that?

3 A The HR manager.

4 Q Who was the HR manager?

5 A Leigh Weaver something like that.

6 Q Could you spell that for me, please?

7 A W-E-A-V-E-R.

8 Q And first name was Leo?

9 A Leigh, L-E-I-G-H or L-E-A-H. I don't
10 remember.

11 Q Prior to your employment at JHT -- I'm
12 sorry. With respect to the reason that you give,
13 was that the comprehensive reason?

14 A Yes.

15 Q It had nothing to do with the fact that
16 you violated the employment policies at JHT?

17 A No.

18 Q And you understand we'll be taking the
19 deposition as well; correct?

20 A Yes.

21 Q Whom were you employed by prior to the
22 JHT?

23 A ICONNMA [sic].

24 Q Spell that for me.

25 A I-C-O-N-N-M-A [sic].

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1 Q And how long were you employed by ICONNMA
2 [sic]?

3 A Eighteen months.

4 Q And what did you do for ICONNMA [sic]?

5 A It was a government contract. I worked
6 for Lockheed Martin.

7 Q When you said "you worked for Lockheed
8 Martin," I want to be clear here. Nine defense
9 contractors are assigned to do jobs at
10 Lockheed-Martin. Were you employed by Lockheed
11 Martin?

12 A No. I was employed by ICONNMA [sic].

13 Q Okay. So you were employed by ICONNMA and
14 you were doing work at Lockheed Martin?

15 A Correct.

16 Q So where did you report to work for
17 ICONNMA?

18 A I worked from home.

19 Q What was your title?

20 A Senior instructional designer.

21 Q That was the same basic job that you have
22 presently?

23 A No. Oh, do you mean you title? Yes. Not
24 the same company.

25 Q No, the type of work. Is the work the

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1 same?

2 A Yes.

3 Q Is it similar to the work that you did at
4 JHT?

5 A Yes.

6 Q Whom did you work for prior to ICONNMA
7 [sic]?

8 A Prior to there, I had a three-month
9 contract -- I'm trying to remember the name -- it
10 was another defense contractor. I can't remember
11 the name of the company right now.

12 Q All right. So prior to this three-month
13 engagement with the defense contractor that you
14 can't remember, who else were you employed -- or I'm
15 sorry -- immediately prior to engagement, who were
16 you employed by?

17 A Before that one, I did Uber driving as I
18 was recovering from my strokes.

19 Q When did you commence Uber driving?

20 A When did I start?

21 Q Yeah.

22 A I want to say sometime in 2017. I did it
23 for like a year.

24 Q Did you have any other sources of income
25 other than those jobs in that same period of time

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1 going back to 2017 that you haven't told me about?

2 A No. I own a business. The business had
3 contracts, but those were my only W2 jobs.

4 Q So the answer is "yes," you did have
5 income from other sources outside of this
6 employment; correct?

7 A Those were W2s, correct.

8 Q So did you receive 1099s from these other
9 entities?

10 A Yes, I did.

11 Q What were those entity names?

12 A The name of my company that I run is
13 Project Change Consultants.

14 Q That's the Florida LLC that you
15 established; is that correct?

16 A Correct.

17 Q And this Project Change Consultants, did
18 you ever hold yourself out to be a doctor at Project
19 Change Consultants?

20 A No, not that I'm aware of.

21 Q Is there anything that would change your
22 testimony?

23 A I don't know. I do not recall.

24 Q And you've been doing Project Change
25 Consultants since approximately May of 2011?

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1 A Mhm.

2 Q So in 2010, you did not hold yourself to
3 be a doctor; correct?

4 A Correct.

5 Q Have you done any podcasts in the last six
6 months?

7 A Yes.

8 Q And in one of those podcasts, do you not
9 hold yourself out as a doctor of psychology?

10 A I don't recall.

11 Q So would it be your testimony that it's
12 possible that you would have held yourself out to be
13 a doctor?

14 A I do not recall. I do not have it in
15 front of me to listen.

16 Q In fact, you signed one of your complaints
17 to the Illinois Attorney Registration Disciplinary
18 Committee against me as Dr. Bonnie Kurowski; isn't
19 that true?

20 A I don't recall.

21 Q How long have you been generating income
22 from Project Change Consultants?

23 A I think I opened it in maybe 2011. I
24 don't recall the exact date.

25 Q Okay. 2017, were you earning any income

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1 from Project Change Consultants?

2 A I don't believe I was, but I don't have my
3 taxes in front of me.

4 Q Okay. how about 2018?

5 A Maybe, the latter part of 2018.

6 Q When you say the "latter part of 2018,"
7 that was during the pendency of your bankruptcy;
8 correct?

9 A Correct.

10 Q So during the pendency of your bankruptcy,
11 at any point in time did you alert the United States
12 Trustee of the change to the income that was
13 reported on the schedules that were attached to your
14 bankruptcy petition?

15 A If I had a change, I would have reported
16 it, but I don't have my taxes in front of me to
17 determine when I started the business back up after
18 the stroke.

19 Q Okay. So in 2018, you filed a bankruptcy
20 petition in September; correct?

21 A Maybe, yeah, sounds right.

22 Q And at that point in time you had no
23 income; correct?

24 A Correct.

25 Q And in October of 2018, you filed a

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1 petition for a fee waiver in the Lake County Circuit
2 Court here in Florida in which you indicated you had
3 no income; is that correct?

4 A Correct. Then I probably had no income.

5 Q All right. And then you filed a separate
6 petition, 34 seconds later in that same court, in
7 which you articulated that you had a \$4,000 a month
8 income; isn't that correct?

9 A I don't recall that document.

10 Q Well, because there's a document on file
11 with the court in that case from you, is there any
12 reason that you would have to doubt its voracity?

13 A No.

14 MR. EDINGER: Can you show her that
15 document, Counsel?

16 MR. HANLON: I will, Counsel.

17 A I'm sure whatever was filed, was filed.

18 BY MR. HANLON:

19 Q I'm asking you, did you have any income
20 from Project Change Consultants in 2018?

21 A I don't have anything in front of me to
22 verify that right now.

23 Q Okay. So you can testify to only if you
24 can verify it; is that correct?

25 A Correct. I had a stroke. I was

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1 recovering from three strokes.

2 Q And that's when you commenced Uber
3 driving; correct?

4 A Sometime during that timeframe, yes.

5 Q Who was the treating physician for these
6 strokes?

7 A Allison Trembley.

8 Q Can you spell the last name, please?

9 A T-R-E-M-B-L-E-Y, maybe.

10 Q Have you started a GoFundMe page?

11 A Timeframes?

12 Q Well, let's say in the last year.

13 A Yes.

14 Q Okay. What was that GoFundMe page
15 designed for?

16 A To fight insurgency in Illinois.

17 Q You said to "fight insurgency"?

18 A Correct.

19 Q So we're going to takeover the government?

20 A That seems to be a pretty vague statement.

21 Q Well, you used the term "insurgency."
22 What did you mean by it?

23 A Insurgency as it is. Anybody that's
24 trying to harm democracy and take over governments
25 in Illinois.

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1 Q Okay. So on this GoFundMe page that you
2 created, do you refer to the Edgar County Watchdogs
3 as a hate group?

4 A On the GoFundMe, it strictly says
5 insurgency.

6 Q Is there a -- one second. Is there a
7 photograph on that GoFundMe page when there's
8 reference to Edgar County Watchdogs?

9 A I believe it's a picture of the Capitol.

10 Q The Capitol of the United States?

11 A I think so. I think that's what was used.

12 Q How sure are you about that photograph?

13 A Not 100 percent.

14 Q Can you tell me what the source of the
15 photograph was?

16 A I don't recall.

17 Q Okay. And does it not articulate that the
18 Edgar County Watchdogs are at the Capitol on
19 January 6th?

20 A I do not recall that on the GoFundMe.

21 Q Would you be surprised to know that the
22 picture that you posted was of a riot in London,
23 England?

24 A No, it wouldn't surprise.

25 Q So source of the picture came from where?

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1 A I don't know. It was one of the automatic
2 ones you can choose on the GoFundMe sites.

3 Q Since we both know what I'm talking about,
4 it wasn't a picture of Mr. Kraft or Mr. Allen --

5 A -- if you're going to ask me generic
6 questions without showing the documents, I can't
7 recall any of this. It was a while ago.

8 Q -- so how long ago did you set up the
9 GoFundMe page?

10 A I don't recall.

11 Q All right. There's a stack of papers that
12 are in front of you at the moment. I want you to go
13 to a -- commencing at 122.

14 So, in the lower right-hand corner of this
15 big stack that's in front of you, you'll see that it
16 says Kurowski and there's a bunch of numbers and
17 those are called Bates stamp numbers. And so if you
18 could just go to that page, 122.

19 I promise I won't ask you anything any
20 time soon about anything before 122. So you can set
21 the stack aside. Just so that you're looking at the
22 same thing I'm looking at, could you just hand me
23 that one page, and I'll give it right back to you
24 here because of the volume here.

25 That's a publication on a website that you've

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1 commissioned an audit performed by Ms. Benford?

2 A No.

3 Q Who commissioned the audit that was
4 conducted by Ms. Benford?

5 A The newly elected official at the time.

6 Q And do you know what his name was?

7 A I don't recall at this moment.

8 Q All right. And could it have been
9 Andrew Gasser?

10 A I believe so.

11 Q Okay. And Mr. Gasser paid for an audit,
12 and he received an audit, didn't he?

13 A When did he receive the audit?

14 Q I'm asking you.

15 A My FOIA request for four FOIA request over
16 last year, where each and every time they
17 ascertained that no audit had been received.

18 Q So you got that from the township, though,
19 because you sent the FOIA request to Algonquin
20 Township; correct?

21 A No. I sent to the road district to.

22 Q Did you maintain a copy of that?

23 A I don't know. I could look back in my old
24 e-mails.

25 Q Would that be a business record of yours?

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1 number of podcast over the course of the last year;
2 correct?

3 A Yeah. I don't recall how many, but, yeah.

4 Q And I don't know if I've asked you this
5 question, and if I have, forgive me, but in your
6 podcast have you held yourself out to be a doctor?

7 A I don't know. I don't recall.

8 Q Have you ever suggested the ability to
9 confine someone due to a mental disability in
10 relationship to your status as a doctor?

11 A I don't know. I don't recall.

12 Q Well, is that something that you might
13 assert?

14 A Anyone could do that in Florida.

15 Q Okay. So you've not made any
16 representation being a doctor, in connection with
17 potentially, you know, confining someone for
18 evaluation?

19 A I don't recall at this time.

20 Q Have you referred to either Mr. Kraft or
21 Mr. Allen as mentally unstable?

22 A I don't recall at this time.

23 Q I'd like you to look at page No. 314,
24 please. Do you see on that page where there's a
25 statement about Ms. Benford? It says "accounting

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1 and CPAs, she is not a forensic auditor, yet has
2 done services, collected pay, but not turned in the
3 audits."

4 A Actually, the sentence says, "accounting
5 and CPAs she is not a certified forensic auditor,
6 yet has done services, collected pay, but not turned
7 in the audits."

8 Q Okay. So it's your contention that
9 Ms. Benford performed an audit, did not turn the
10 report in and was paid money?

11 A That is what I was told.

12 Q Who told you that?

13 A That is when, like I said, when I called
14 and to talk to Randy Funk and said, "how many times
15 do I have to turn in this request for audit or can
16 you just finally send it when it comes in?"

17 Q Is it possible that you just simply sent
18 your FOIA request to the wrong unit of government?

19 A I'm not sure.

20 Q And isn't it true that Ms. Benford
21 prepared an audit and delivered an audit report to
22 the Algonquin Township Road District?

23 A I am unaware.

24 Q What steps did you take to verify the
25 truth and voracity of that statement before you

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1 published it?

2 A Sent in three FOIA request, called the
3 supervisor, inquired on the process.

4 MR. HANLON: Counsel, I just got a little
5 red flash from my computer that told me it was
6 the noon hour. This is typically where I like
7 to take a break.

8 MR. EDINGER: I'm cool with that.

9 (Lunch recess 1:03 p.m. until 2:13 p.m.)

10 BY MR. HANLON:

11 Q Ms. Kurowski, earlier I had asked you
12 about whether or not you had held yourself out as a
13 doctor. Do you recall that testimony.

14 A Yes.

15 Q All right. And as I understand it your
16 testimony is, that you have not held yourself out as
17 a doctor?

18 A I said I do not recall.

19 Q You don't recall. Would seeing a video of
20 yourself, representing yourself, to be a doctor
21 stimulate your memory?

22 A Depends what's the year of the video.

23 Q Has there ever been a year in your life
24 that you've been a doctor?

25 A No. I'm not understanding your question.

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Q Okay. In your lifetime, have you ever held yourself out as a doctor?

A Not that I'm aware of.

MR. EDINGER: How are we going to preserve this for the record?

MR. HANLON: Well, I'm going to play it and then I'm going to use the URL for the video. And this is posted on Citizens for a Bolingbrook.

MR. EDINGER: The way that we have done this past because the court reporter is, right, the recipient of our record. Typically, we've had you, as the proponent, provide me a copy by Dropbox, or some other way, with the link that the court reporter is going to be aware of.

And so the way I've done it in previous cases is, you will be the formal custodian of this piece of evidence, but by doing it this way, providing me the copy, and providing information to the court reporter, will have preserved the record properly.

MR. HANLON: I'm sending it to him right now. I just need the e-mail address to do it via e-mail. This is actually going to come from my client's device. And I'm, obviously,

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Reporter, that's one of your sites; right?

A Mhm.

Q And would you look at this and tell me whether or not you made this statement or not?

A There's no date on this.

Q Okay. I asked you whether or not you made the statement. I didn't ask you for the date. Look at it, read it.

A I just asked for clarification of the date.

Q Okay. Look at the document and just simply answer my question, yes or no, did you write it?

A I don't recall.

Q Have you looked at the entire document?

A I'm looking at it right now. I don't recall.

Q And even seeing the document, you still don't recall?

A I don't recall.

Q Okay. Exhibit No. 6 is two pages. I asked you earlier about your GoFundMe page and photo. Do you recall that discussion?

A Yes.

Q I'm marking for identification Exhibit

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No. 7.

(Thereupon, marked as Plaintiff's
Exhibit 7.)

BY MR. HANLON:

Q Where it says "raising money to protect
Illinois Democracy." This is your GoFundMe page;
correct?

A Correct.

Q All right. And this says "during this
process we stumbled upon a local hate group called
ECW, they're training insurgency and doing hostile
takeovers of our local government. This is their
picture." Do you see that statement highlighted in
yellow?

A Mhm.

Q Okay. Where in the picture in that are
any members of the Edgar County Watchdogs?

A It doesn't seem to match.

Q But you published this; correct?

A There's two other people on the site.
Maybe it was different at one point. It change or
altered.

Q It says "Bonnie Kurowski-Alicea is
organizing this fundraising." This is your
statement, "my name is Bonnie and I am"; right?

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A Right. But apparently there was something changed overtime or something.

Q Did you publish the statement, yes or no?

A I don't recall publishing that part. There must be a mismatch somewhere.

MR. EDINGER: It would be helpful if you identified which parts you can ID and which parts you can't.

A I mean obviously the first sentence looks like mine. It might have been the original.

Q The two sentences that are highlighted, did you make those statements?

A See, that I don't believe I did, but I don't want to confirm or deny it because, like I said, it changed overtime. I'm not even sure this is what it says right now.

Q Well, it says that you're the administrator for it; right?

A Yes.

Q And this is the same other two people that are administrators of this site as well?

A They have access, yes.

Q And you've gained a -- you've got a total of \$70 in contributions?

A Apparently.

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Q Did you make either of those two donations?

A Probably the first 20.

Q And you're sure you didn't make the second \$50 donation?

A No.

Q And you're sure about that?

A Yes.

Q I had sent you a letter before we filed the lawsuit in this case. Do you remember receiving that letter?

A Which letter?

Q The letter that I dated on May 15, indicating that I was going to file a lawsuit and attached the copy of the complaint?

A No, I do not recall. How was it sent and do you have a copy of that letter?

Q If you don't recall, you don't recall it. That's fine.

A Do you have a copy of it?

Q I'm not answering your questions. Please stop that. Okay. So --

A -- when he's asking questions about.

MR. EDINGER: Just answer his questions. If you don't understand something or need a

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record for Illinois Reporter.

Q Okay. So what business entity is associated with edgarcountywatchdog.com?

A What do you mean what business entity?

Q Is there one associated with edgarcountywatchdog.com or just you individually?

A It's just a -- what we call that -- I'm trying to think of the words.

Q Okay. Let me make it easier for you. Who paid for it?

A I did.

Q Personally?

A As a journalist.

Q Did you personally pay for it with your own money?

A Yes.

Q Okay. Did you get a reimbursement from anyone for having purchased that?

A No.

Q Have you been paid by anyone to advance any claims against Edgar County Watchdogs?

A What do you mean? Can you specify that a little?

Q Has anybody paid you any money to advance claims against Edgar County Watchdogs, Kirk Allen

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and John Kraft?

A No.

Q Did you assist Terry Wilke in creating a website called avontownship.com?

A No.

Q Have you shared e-mails with Terry Wilke?

A Journalistic privilege.

Q We're going to argue about that later. But right now I need you to answer the question, whether or not you exchanged e-mails.

MR. EDINGER: You should answer that question.

A I don't believe there are e-mail exchanges. I believe it's just phone exchanges.

Q Have you exchanged any e-mails with Ms. Figgs?

A No, just phone.

Q Just phones? You didn't have any exchange of documents between the two of you?

A I did send her an e-mail that notified her that she was going to be subpoenaed by you.

Q And was that so that she could evade service of process?

A No. That was so she was aware she was being dragged into the case.

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Q Okay. And is that the extent of your communications with her?

A No. I do have phone conversations with her.

Q Okay. Did you have any written communications with her?

A Not that I recall.

Q Okay. You recently sent a -- I think it's your fifth complaint in the Illinois ARDC about me in which you attached an affidavit from Ms. Figgs; is that correct?

A Yes. That came into my tip line.

Q Okay. An affidavit came in to your tip line?

A Yes, as an attached document.

Q So you don't know that that actually came in from that Ms. Figgs; right?

A I am unaware. I did not even ask her.

Q So when making your complaint about me, you didn't even ask the person whose affidavit you relied upon, is that it? Is that true?

A The reason why is because the affidavit was not from her first point of view, but it was from her opinion of other people's point of view, therefore, as a journalist that's not first point of

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A One of her campaign managers.

Q Who?

A Cornel Darden.

Q So Cornel Darden contacted your employer?

A Yes, you have the evidence of that. There is a letter that exists that you received from JHT.

Q Okay. So Cornel Darden contacted JHT and that caused you to lose employment at JHT?

A Yes. He falsely accused me of things.

Q That was Cornel Darden?

A On top of the other ones that they have received from this group.

Q Okay. So have you ever had a top-secret security clearance?

A I've had a security clearance.

Q Okay. I asked you a "yes or no" question. Do not interrupt. We are not doing this the rest of today. Have you ever had a top-secret security clearance?

A Yes, I have.

Q When did you have a top-secret security clearance?

A On and off since 2012. Different clearances throughout. I've been doing government contracts for the better part of 12 years.

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A Yes, I'm very familiar with him.

Q And did he not say that your security clearance remained in effect and it could be reanimated if you secured employment at another defense contractor?

A They would have to start it over. It would take six to nine months to hopefully clear me.

Q Actually, that's not what he says, does it?

A That is. Him and I had a conversation about it.

Q Okay. Other than what you've told me in your testimony so far, did you have any other reasons to name one of your websites edgarcountywatchdog.com?

A Because they spoofed a bunch of my sites and it just made sense.

Q Other than that, anything else?

A No.

Q Identify for me each employer that you had where you had a top-secret security clearance.

A Okay. I think the first one -- I'll do my best because it's been a lot -- the first one was HP, Corporation HP. I was working for them doing work for the Department of Veterans affairs.

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Q I didn't ask what you were doing. I just said identify the corporation. You said HP, as in Hewlett-Packard?

A Yes.

Q So you were an employee for Hewlett-Packard?

A Yes.

Q When were you an employee of Hewlett-Packard?

A 2012, 2014.

Q So you were an employee of Hewlett-Packard between 2012 and 2014?

A Mhm.

Q What was your title there?

A Senior instructional designer, probably.

Q After you left HP, what other employer were you employed by where you had a top-secret security clearance?

A Kratos.

Q Spell it for me.

A K-R-A-T-O-S.

Q And where are they located out of?

A South Carolina or something. I work virtually.

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

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where they're located at?

A I'm a virtual worker. Where their corporate office is irrelevant to me.

Q So it could be anywhere in the world; right?

A Mhm.

Q Do you work for anybody outside of the United States?

A Sometimes.

Q Whom have you had a top-secret security clearance with other than HP and Kratos?

A General Dynamics.

Q Were you an employee of General Dynamics?

A Yes.

Q When were you an employee of General Dynamics?

A 2019.

Q Are you sure about that?

A Maybe it was 2020. It was recent.

Q So it was immediately before your employment at JHT?

A It was at the same time.

Q Did you disclose your employment at General Dynamics to JHT when you applied for employment at JHT?

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Q All right. We're not here about chains of evidence.

A I don't recall.

Q Okay. And that's a Facebook post; right?

A I don't know. It's an e-mail to somebody.

Q Can I retrieve that for a quick second? I got to mark this, Exhibit 14.

(Thereupon, marked as Plaintiff's Exhibit 14.)

BY MR. HANLON:

Q On January 9, three days after the incident at our nation's Capitol has been referred to as a D.C. siege or the insurgency. Are you familiar with that public event of January 6th, of 2021?

A Yes.

Q Okay. Did you make a statement on edgarcountywatchdog.com that "ECW is a team far-right wing patriots who involve themselves, and in fact they are patriots supporters linked to the D.C. siege." Did you make that statement?

A Possibly.

Q Okay. I'm asking you, did you make the statement, yes or no?

A I don't have in front of me, but I say

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possibly.

Q Is that because --

A -- because of Genie Ives. I actually was at the Capitol that day.

Q -- so is Genie Ives part of Edgar County Watchdogs?

A They have supported her, very recently and ongoing.

Q You continued on the Edgar County Watchdog site stating, "they are securing people mentally unstable and now have been attached to the hostile takeover of our nation's Capitol."

A I don't recall that statement.

Q All right. Why don't you take a look at Bates No. 869 to 870. We're going to mark that as Exhibit 15.

(Thereupon, marked as Plaintiff's Exhibit 15.)

MR. EDINGER: Counsel, is this your best copy you have for 870?

MR. HANLON: Yeah, it's the font that won't print out.

MR. EDINGER: We'll make due then.

MR. HANLON: I can give you a link to the website, your client runs that.

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question involvement on his stories? Because he's asking specifically Kirk Allen, but Kirk Allen and John Kraft both sign their stories?

MR. HANLON: Counsel, I appreciate that she's asking you to -- just tell us how to answer the question.

MR. EDINGER: You can ask him to clarify but just listen carefully. If he ask whether you -- as I understand it -- whether you have any information Mr. Allen, just Mr. Allen, making a false statement. So that seems to be a fair question. And if you have any information in response, answer. If you don't have any information in response, that will be your answer. Fair question, give the gentleman an answer.

A Okay. Let me think about it. Yes.

BY MR. HANLON:

Q What example can you give me in which Mr. Allen has made a false statement?

A He claimed, about a month ago, that I would not have an attorney. I would have to represent myself in a Facebook post.

Q Okay. So was that before you retained new counsel in Northern Illinois?

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A That was in the process of retaining new counsel, yes.

Q So it was a statement of opinion; right?

A Possibly, I'm not sure.

Q So with respect to any statement of fact -- do you know the difference between a fact and an opinion?

A Yes.

Q Okay. Can you tell me of a single factual statement made by Mr. Allen that was false?

A He wrote a story about Mary Pat Oliver that claimed she was a racist.

Q Mr. Allen wrote a story about --

A -- Mr. Allen and John Kraft on both the article. So if we're not going to clarify, I would have to say they're both responsible.

Q -- so I asked you pointedly --

A -- and I responded pointedly.

Q -- pointedly a statement by Mr. Allen that you know he made that was false? If you don't know who may have written whatever this statement was, okay. I'm asking you what statement that Mr. Allen made that you know is false?

A I already answered that.

Q I'm sorry. I don't have an answer for a

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statement that Mr. Allen made that you know is false.

A He publicly stated that I did not have an attorney representing myself. That's the most recent one that I can come up with right now.

Q Okay. Other than that, any other false statements by Mr. Allen that you're aware of?

A Let me think about it. I'm going to have to refer back to my documents for this. I don't have them with me.

Q Okay. If you can't identify one, you can just simply tell me you can't identify one. But your lawyer cannot answer the question for you.

A I'm saying we don't have time for me to try and access this. I believe that there were other ones, but right now I can't recall.

Q All right. Well, I'll give you a document to identify any others. If I ask you the same question, about Mr. Kraft can you identify a single false statement made by Mr. Kraft?

A Yes.

Q What is the false statement made by Mr. Kraft?

A He called a son of a "b" on his video in Wesley Township.

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Q Okay. Other than calling you a son of "b" -- and I'm assuming that by "b" you meant bitch; correct?

A Mhm.

Q On some video he referred to you as a son of a bitch?

A Mhm.

Q Did you retain a copy of that video?

A Yes, my attorney in Illinois has it.

THE STENOGRAPHER: Just to kind of refresh your memory, saying "mhms" are not clear on the record.

MR. HANLON: Can you read back the question that she said "mhm" to?

(Thereupon, requested portion read back.)

BY MR. HANLON:

Q And was that a "yes"?

A I would assume that's what it is.

Q Okay. It's your answer. Did he use the word "bitch" or did he say "son of a b"?

A Son of a.

Q I'm asking to put quotation with marks.

A That's what he said. Just son of a...

Q Without finishing that? So he went so far as imply son of a bitch, but not necessarily say son

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of a bitch?

A That's not my interpretation.

Q I just want to know what he said. Give me the words that he said.

A I just said it.

Q Okay. Are there any false statements that were made by Mr. Kraft, that you can identify?

A Off the top of my head, no, but if you like to send me a document I can identify that.

Q As you sit here today, you can't identify any other false statement from Mr. Kraft; is that correct?

A At this moment I cannot recall. It doesn't mean it doesn't exist.

Q So what about Ms. Benford? Have you ever met Ms. Benford before these depositions this week?

A No.

Q Okay. In fact, today is the first time you've ever met her; correct?

A Mhm.

Q And if she wasn't present here in this room you probably -- I'm sorry strike the question. Are you aware of single false statement made by Ms. Benford? What false statement are you aware of made by Ms. Benford?

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A She referred to my religion recently about the Buddhist and the Jewish heritage and practicing Buddhism that was a false statement. And there was some others in that same chain that she had mentioned. As a matter of fact, I believe there was a threat in that one as well about some friend that could take me on. So I figured that was a lie too, I would suppose because I'm still here. That was the most recent, but again I can go back in my records if needed.

Q Have you ever suffered any pecuniary loss from a false statement made by Ms. Benford?

A I would have to think about what the loss was. That might take some time.

Q Okay. Does anything come to mind where you suffered a pecuniary loss because someone made a false statement about you?

A Yes.

Q Okay.

A I've suffered a lot of losses here financially from the false statements made by either the people at this table or the people associated to them.

Q I'm asking you about Ms. Benford right now.

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opening of my new business.

Q So did you have any contracts that were executed and signed that you lost as a result of whatever the statement that Alyssia Benford made?

A We had some pending artist we were trying to sign that I had to tell him we were no longer opening just yet. That did harm us.

Q Stop. That is not what I asked you. I asked if you had a written contract that was canceled as a result of anything that you said? The answer is either yes or no?

A Okay. No, there is no written contracts.

Q Okay. Had you any other agreements with other individuals associated with this Tontell Records production? Do you have any other agreements that were pending?

A I have verbal agreements.

Q Who did you have a verbal agreement with?

A I had a verbal agreement with one artist named Charles something. A big blues artist who was in hall of fame, blues hall of fame, that fell through because of this. I had agreements with Zanius Motown for running and operating the studio. I had spoken with some other people about some other work to be done for that studio that has now been

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placed on indefinite hold.

Q Just identify the persons by name.

Nothing other than that.

A Okay, I just did.

Q You said Charles somebody. What's Charles somebody's last name?

A I'm trying to remember.

Q What was the definite and specific terms of the agreement with this Charles somebody?

A We were going to take him on as a -- as his label and his studio and his manager.

Q Charles, in the hall of fame. What hall of fame is he in?

A He's in the blues hall of fame. He was just induced in 2019. His name will come to me, I just can't think of it right this second.

Q Have you ever labeled Kirk Allen, John Kraft, or Alyssia Benford as a terrorist?

A I don't know. I do not recall.

Q I want you to look at Bates No. 797. Have you had a chance to familiarize yourself with 797? I required a "yes or no" answer. Did you or did you not?

A I'm sorry. What was the question? I was reading.

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location.

Q That's a federal agency that determines security clearances for the United States Government Department of Defense; right?

A Okay.

Q Well, if you don't know, you can say you don't know.

A I don't know.

Q And that is the only system security clearance where information is stored; right?

A I don't know. This is not my line of work.

Q Okay. So when you obtained security clearances from HP and Kratos and General Dynamics, they took care of applying for your security clearances each time?

A Yes.

Q And any of these did they transfer your security clearance from one employer to the other?

A No.

Q So you were employed by General Dynamics in 2019?

A No. It was 2020 because it was the same time, right before JHT. Right before I took employment with JHT.

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Q So you had a security clearance of top-secret?

A No. They had put in an application for me and they were dueling the application with JHT.

Q So JHT, they were dueling?

A Duel sponsorship.

Q Okay. So when I asked you about that top-secret security clearance, do you recall filing a complaint in the Circuit Court of Lake County, Florida against Teresa Bhoj?

A Yes.

Q And you made a statement within that complaint, that your employer that deemed her high-level security risk. Do you remember making that statement?

A Yes.

Q Okay. What employer were you talking about?

A Project Change Consultants.

Q Which is you?

A Yes, that's one of my companies.

Q So you didn't tell the court that you determined that she was a high-level security risk?

A I said my company is the exact statement I used in the courts. My company deemed her a high.

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Q Okay. And that's the company that -- I'm sorry, strike that. Were you ever employed by the Department of the Defense?

A Direct employed, no.

Q Okay. You indicated that you were top-secret DOD employee. Was DOD an indication of Department of Defense in that pleading?

A No. That was referring to -- I was an employee of JHT, which was a DOD contractor.

Q Okay. So the employer that had the defense contract, the security clearances, they never deemed Teresa Bhoj to be a high-level security risk; right?

A No, I said my company did.

Q Right. And you identified your company in the pleading as JHT and something that I couldn't --

A -- no, I did not.

Q -- are you sure about that?

A Yes.

Q So if there's a pleading that says your employer was JHT and that was connected or filed with the court. You would not have written JHT underneath the employer?

A JHT is not written anywhere in that complaint. And just for the record --

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was ordered to immediately reduce her workload since she is at a high risk of having another stroke. The Debtor has medical documents to support this claim."

And in paragraph 7 it reads, "this year the debtor has become unemployed due to these medical conditions, the sole source of income for herself and her child barely suffices for the necessities of this life. This condition is deemed a lifetime condition, indicating the state of affairs is likely to persist for the significant portion of the repayment period for the student loans." Do you see that?

A Yes.

Q All right. So that lifetime condition, do you still have that lifetime condition?

A Yes. Once you have strokes, they do not go away.

Q According to this document, that impaired your ability to obtain income; correct?

A Yes, during that time it did.

Q Well, at the time you filed this, and that was in to 2018; correct?

A Mhm.

Q All right. And you were making a roughly \$4,000 a month from Project Change Consultants at

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that time; isn't that correct?

A At that time I believe I was Ubering to try and make ends meet.

Q Just Ubering?

A Yes, I believe so. I don't have my taxes in front of me, but, yes, I had a very much reduced income on my taxes.

Q And because your brain wasn't working properly, at that time you were Ubering; right?

A Correct, when I could.

Q Okay. Is this a true and accurate copy of the adversarial proceeding that you filed in bankruptcy court?

A Yes.

Q Now, you're aware that you testified earlier that you had only filed bankruptcy twice; right?

A Correct.

Q All right. You filed bankruptcy on 2/27 of '06 in the Northern District of Illinois; is that correct?

A About that, I thought it was '08, but it could be '06.

Q Okay. And also you filed a petition -- do you know a Dennis Kurowski?

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Q Before I get to that exhibit, I'm going to ask a question. Did you ever reside at 1333 Modaff Road, Apartment A7, in Naperville?

A Yes.

Q And do you know a Steve B. Welch?

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A Yes.

Q Who is Steve B. Welch?

A My ex-husband.

Q And so you filed a joint bankruptcy petition with Mr. Welch, as case No. 96-28146 on October 22, 1996; is that correct?

A I do not recall that.

Q You don't recall if you filed a bankruptcy with Mr. Welch?

A I think he filed it. I don't recall if I was on that or not.

Q All right. The last four digits of your social security number 0529; correct?

A Correct.

Q All right. Now, the declaration that's in front of you. So we're going mark this as Exhibit No. 19.

(Thereupon, marked as Plaintiff's Exhibit 19.)

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Q Okay. Is there a reason that you're hedging that you said "believe so"?

A When I had initially spoke with my attorney about this, is when I went into the Mayo Clinic. So I do believe this is, yes.

Q So that was 4/15 of '18?

A Yes.

Q So you were at the Mayo Clinic in April of 2018?

A Yeah, around then. I don't remember the exact dates.

Q Okay. I'd like to draw your attention to paragraph 8. And it says in paragraph 8, "I have a Master's degree from National Louis University and a the Ph.D. from Capella University in industrial and organizational psychology." Do you see that?

A I see where it says that. That should have been on two different lines.

Q Okay. But, you know, whether that should or shouldn't be two different lines, is okay. Is paragraph 8 true, yes or no?

A It does not appear to be complete.

Q Is it true, yes or no?

A It's missing the ABD.

Q You do not have a Ph.D. from Capella

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University; isn't that correct?

A It's missing the ABD from that statement.

Q It may be missing. Is that statement true or not, as it's written?

A No.

Q So it is not true; correct?

A Correct.

Q All right. Paragraph 17, says "Project Change Consultants, LLC, has 20 to 30 fortune 500 companies. These include Aetna, Wells Fargo, Walt Disney, IBM, Walmart, Fenestro, Build-ED, Pentaho, Anthem, State Farm, and Walgreens." Do you see that?

A Yes.

Q Does Project Change Consultants still do business with those same entities to this day?

A No.

Q Okay. How many contracts did Project Change Consultants have with Aetna?

A One.

Q How many did it have with Wells Fargo?

A One.

Q How many with Walt Disney?

A One.

Q How many with IBM?

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ALACHUA

I, SIERRA SCARNATI, STENOGRAPHER, Notary
Public, State of Florida, certify that
BONNIE KUROWSKI personally appeared before me on
February 16, 2022 and was duly sworn.

Signed this 2nd day of March, 2022.



SIERRA SCARNATI, STENOGRAPHER
Notary Public, State of Florida
My Commission No. HH 170498
Expires: 08/29/2025

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CERTIFICATE OF REPORTER

STATE OF FLORIDA
COUNTY OF ALACHUA

I, SIERRA SCARNATI, STENOGRAPHER, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of BONNIE KUROWSKI; that a review of the transcript was requested; and that the transcript pages 1 through 289, is a true record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated this 2nd day of March, 2022.



SIERRA SCARNATI, STENOGRAPHER