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1 Toronto, Ontario
 2 --- Upon commencing on Tuesday, January 17, 2017,
 3 at 10:04 a.m.
 4 AFFIRMED: KEVIN ARRIOLA
 5 CROSS-EXAMINATION BY MS. WOOD:
 6 1 Q. Good morning, Mr.
 7 Arriola. My name is Alexi Wood. I am counsel for
 8 the Ryerson Students' Union. I am going to be
 9 asking you some questions this morning. I am sure
 10 your counsel has already explained to you that if
 11 you don't understand any of my questions or have a
 12 question about anything, just let me know. If you
 13 need to take a break at any point, you are in
 14 charge. Lawyers tend to just put our heads down
 15 and forget about everything else that is going on
 16 around us. If you need a break at any point, just
 17 let me know.
 18 Can you spell your name,
 19 please, for the record?
 20 A. K-e-v-i-n. My last name
 21 is A-r-r-i-o-l-a.
 22 2 Q. You are one of two
 23 Applicants in the application that is at issue
 24 today, which is the application bearing court file
 25 number CV-16-550599. Correct?

1 I was recently provided with
 2 the one that was given to me, so I received that
 3 at the beginning when I went to find out how we
 4 could apply, but I didn't know that it wasn't
 5 public, so that is why I was unclear about if I
 6 had seen it before.
 7 7 Q. So future Alexi can
 8 understand what you just said when I read the
 9 transcript again, I just want to be clear.
 10 We recently provided to your
 11 counsel a supplemental affidavit of Obaid Ullah
 12 that was sworn on January 16, and Exhibit A to
 13 that affidavit is a document entitled Policy on
 14 New Student Groups. You are referring to that
 15 document that is Policy on New Student Groups.
 16 Correct?
 17 A. Yes, I have seen that
 18 policy.
 19 8 Q. When did you see that?
 20 A. When I first went to find
 21 out how we could apply, Leatrice O'Neill, who was
 22 the student groups administrator, she gave me that
 23 document.
 24 9 Q. Thank you. Is there
 25 anything else in your affidavit that you would

1 A. Yes.
 2 3 Q. The Respondent in that
 3 application is the Ryerson Students' Union. I
 4 will be referring to that as RSU for short.
 5 A. Okay.
 6 4 Q. In support of that
 7 application, you swore an affidavit, which is
 8 contained in the application record, which is in
 9 front of you. Correct?
 10 A. Yes.
 11 5 Q. We just created an
 12 application record, but I see you just have the
 13 affidavit in front of you. That is fine. We
 14 created an application record just so I had one
 15 that had the notice and the affidavit in it.
 16 Mr. Arriola, have you reviewed
 17 your affidavit before today?
 18 A. Yes, I went over it.
 19 6 Q. Is there anything in the
 20 affidavit that is incorrect or that you would like
 21 to amend or correct?
 22 A. Yes, let me just find it.
 23 Paragraph 26 says, "To my knowledge, RSU has no
 24 such written policy requirement for student group
 25 recognition." I think I would like to amend that.

1 like to correct or amend?
 2 A. No.
 3 10 Q. This morning you affirmed
 4 to tell the truth in this cross-examination?
 5 A. Yes.
 6 11 Q. What did you do to
 7 prepare for today's cross-exam?
 8 A. I went over my affidavit
 9 and spoke to my counsel.
 10 12 Q. I don't want you to tell
 11 me anything that you talked about with your
 12 lawyer. That is between you and your lawyer. Did
 13 you talk to anyone else other than your counsel?
 14 A. No.
 15 13 Q. When you swore your
 16 affidavit, you were a fourth year student at
 17 Ryerson University. Correct?
 18 A. Yes.
 19 14 Q. Have you now graduated?
 20 A. I was three credits
 21 short, so I took off last semester, and I just
 22 went back now to finish it off.
 23 15 Q. Great. Congratulations.
 24 You will be done at the end of the semester?
 25 A. Yes, finally.

1 16 Q. You are still currently a
2 student at Ryerson University now?
3 A. Yes.
4 17 Q. When you swore your
5 affidavit, you were the president of the Men's
6 Issues Awareness Society at Ryerson. Correct?
7 A. Yes.
8 18 Q. I will refer to the Men's
9 Issues Awareness Society at Ryerson as MIAS as we
10 go through.
11 A. Okay.
12 19 Q. You are no longer the
13 president?
14 A. No.
15 20 Q. It is a woman, Sarah.
16 What is her last name?
17 A. Hafizi.
18 21 Q. She is currently the
19 president?
20 A. Yes.
21 22 Q. But your application is
22 brought to try to make MIAS a student group at
23 Ryerson even though you are no longer the
24 president. Correct?
25 A. Yes.

1 28 Q. It is Sarah, and who is
2 the other person?
3 A. What is her name? Laila
4 Butt.
5 29 Q. What is her position on
6 the executive?
7 A. I think she is the
8 executive of -- what is it called? The events
9 coordinator.
10 30 Q. Ms. Godlewski, am I
11 pronouncing that correctly?
12 A. I think so.
13 31 Q. She was social media
14 coordinator. Correct?
15 A. Yes, social media
16 executive.
17 32 Q. Does MIAS have a social
18 media executive now?
19 A. No. That is being run by
20 Sarah, but we are sort of adjusting our executive
21 team into something else, so the president is now
22 doing a lot of social media stuff.
23 33 Q. Ms. Godlewski graduated?
24 She is no longer involved with MIAS?
25 A. Yes, she has graduated

1 23 Q. Your answers will bind
2 MIAS even though you are no longer the president?
3 A. Yes.
4 24 Q. Who is the current
5 executive of MIAS?
6 A. Sarah would be.
7 25 Q. She is the only executive
8 member?
9 A. No, there is another one,
10 and I said that I would be helping them this year
11 but more of a consulting thing, unless they need
12 me to sign. It is unclear whether I am going to
13 be their executive this year.
14 26 Q. When I talk about the
15 executive, I am talking about -- previously there
16 was you as the president. I know Alexandra
17 Godlewski was on the executive, as well. Was
18 there anyone else who was on the executive at the
19 time that you applied for status?
20 A. Yes, there was someone
21 else, but she wanted to remain anonymous.
22 27 Q. Who is on the executive
23 now? Do you still have three members or do you
24 only have two members now?
25 A. Right now it is two.

1 now.
2 34 Q. MIAS was founded in 2015.
3 Correct?
4 A. Yes.
5 35 Q. You were the first
6 president?
7 A. Yes.
8 36 Q. To whom did you speak
9 when you were getting MIAS up and running?
10 A. At first it was Leatrice,
11 the administrator for student groups. After that,
12 it was mostly --
13 37 Q. I am going to back you up
14 for a second. I want to talk about even before
15 you went to RSU, so when you were looking to
16 create the documents that you took to RSU, did you
17 consult with anybody? Did you talk to anyone, any
18 other men's rights groups? I am looking at the
19 very preliminary stages.
20 A. I had spoken to my
21 friends about it. I had attended CAFE events in
22 the past. I knew a lot of people who were
23 involved with men's issues, and I spoke to them
24 about it. They told me that I should start a
25 student group, so I did.

1 38 Q. You spoke to people that
2 you had met through CAFE?
3 A. Yes, I told them that I
4 had been interested in starting a student group
5 due to my interest in it. Also the fact that
6 there was another student group that had tried to
7 form previous to us that dealt with similar
8 issues, and they got denied, as well, so that was
9 probably the first thing that sparked my interest
10 in starting a student group.
11 39 Q. Did you speak to anyone
12 at CAFE, any CAFE employees or staffers?
13 A. Yes, Justin Trotter, who
14 is I guess the president or CEO. I don't know
15 what his exact position is, but he is kind of the
16 head administrator there. I told him about my
17 plan to start it, and he said that if I needed any
18 help with anything, he had experience with helping
19 other student groups form in other places.
20 40 Q. You have mentioned in
21 your affidavit that you used CAFE as a resource
22 when you were starting MIAS. What do you mean by
23 that? What did CAFE bring to MIAS?
24 A. CAFE got me in contact
25 with a lot of people who not only had gone to

1 Ryerson, not only were at Ryerson but also had
2 gone to Ryerson. Nothing came about with the
3 people who actually attended, but some of the
4 alumni helped us with creating a logo.
5 As well, he gave me general
6 advice about how you should go and recruit doing
7 this if you want, but you should really talk to
8 someone who is the head of student groups at your
9 university to find out what the procedures are.
10 Just sort of general advice like that.
11 He said if I ever needed to use
12 any of the facilities or anything, that the doors
13 for CAFE were always open to groups like ours.
14 41 Q. You said that he put you
15 in touch with people at Ryerson and alumni at
16 Ryerson. Do you recall any of the names of the
17 people that he put you in touch with?
18 A. Yes, probably the biggest
19 one was a guy by the name of Nick Boychuk, who was
20 an architecture student alumnus. He had
21 experience with creating designs and stuff, so he
22 created our first logo.
23 42 Q. Do you recall any other
24 names that he put you in touch with?
25 A. Not really, because

1 nothing really came too much of the other people.
2 I think one of them came to our event, but I
3 couldn't remember her name. She said that she had
4 previously been a student.
5 43 Q. Other than CAFE and your
6 connections through CAFE, did you speak with
7 anyone else or any other groups when you were
8 getting MIAS up and running?
9 A. Yes, we stayed in contact
10 with the Simon Fraser University advocacy for boys
11 and men student group over there. They are
12 actually a student group. They got recognized by
13 their university. They sort of gave us advice
14 about what to do and how to wade through the
15 process of becoming a group.
16 44 Q. Any other groups or
17 individuals?
18 A. I guess Denise Fong, who
19 also worked at CAFE. She is also, I think, the
20 president of the men's issues group at U of T.
21 They are not recognized by their student union,
22 but they are recognized by their university,
23 because it works differently at U of T, I think.
24 We are in contact with U of T. We actually
25 invited them to a lot of our events.

1 45 Q. Anyone else?
2 A. No, just friends and
3 family who were interested.
4 46 Q. How many members did MIAS
5 have when you applied for student group status in
6 2015?
7 A. They had about 40.
8 Around 45.
9 47 Q. Do you know how many
10 members there are now?
11 A. Yes. We recruited about
12 30 this year. I guess the ones from last year and
13 the ones from this year.
14 48 Q. About 75 or so now?
15 A. Sure.
16 49 Q. I am going to show you a
17 printout. This is a copy of the Men's Issues
18 Awareness Society or MIAS Facebook page. We just
19 printed the MIAS posting feed. Would you agree
20 that this is the MIAS Facebook posting?
21 A. Yes, it looks like it.
22 50 Q. I would like to mark this
23 as an exhibit. This will be Exhibit 1.
24 EXHIBIT NO. 1: Printout
25 of MIAS Facebook feed.

1 MS. WOOD:
2 51 Q. The pages are numbered in
3 the bottom right corner. If I could ask you to
4 turn to page 8 of 36, please.
5 A. Yes.
6 52 Q. The bottom post on that
7 page, when it is signed "Kevin," that is you.
8 Correct?
9 A. Yes.
10 53 Q. I want to understand how
11 some of these posts work on this Facebook page.
12 When this one is signed by you, were you posting
13 this in your personal capacity on the Facebook
14 page?
15 A. Yes.
16 54 Q. Then if you turn to
17 page 11 of 36, then again on page 12, in the
18 middle of the page on page 11, there is a post
19 that has Ryerson Men's Issues Awareness, April 11,
20 2016, and there is a link to the Ryersonian.ca
21 about free expression, not a free-for-all.
22 On page 12, Ryerson's Men's
23 Issues Awareness is sharing a CAFE post dated
24 March 17, 2016.
25 For those two posts, no one has

1 signed it, so I want to understand. Are these
2 being posted as posts from MIAS on the Facebook
3 page?
4 A. Yes.
5 55 Q. Who would have posted
6 these? Because you were president at that time.
7 This is in April 2016. You were still president.
8 Correct?
9 A. Yes.
10 56 Q. Would you have posted
11 these or would Alexandra have posted these?
12 A. Probably Alex. I don't
13 remember.
14 57 Q. But it is fair to say
15 that they were being posted on behalf of MIAS?
16 A. Yes.
17 58 Q. There are current posts
18 on the Facebook page if you turn to page 1. The
19 last one on the page that we printed was posted
20 December 30, 2016. Again we have Ryerson Men's
21 Issues Awareness Society sharing a CAFE post. You
22 are no longer president in December 2016.
23 Correct?
24 A. Yes.
25 59 Q. Do you happen to know who

1 is now posting? Would it be Sarah?
2 A. Sarah.
3 60 Q. This post from December
4 2016 would be on behalf of MIAS. Correct?
5 A. Yes.
6 61 Q. You spoke with CAFE and
7 some of the support that CAFE offered. Did MIAS
8 receive any funding from CAFE?
9 A. Not any direct funding,
10 no.
11 62 Q. What do you mean by
12 direct funding?
13 A. We never received any
14 money from them. They got us in contact with the
15 Justice Centre, but I think the Justice Centre
16 does their own fundraising.
17 63 Q. CAFE is the one who put
18 you in touch with the Justice Centre for
19 Constitutional Freedom?
20 A. Yes.
21 64 Q. I am going to show you a
22 newspaper article. This is a newspaper article
23 dated April 12, 2016, from the Financial Post, and
24 it is entitled Men's Issues Group Taking Ryerson
25 University Student Union to Court Over Club

1 Status.
2 Have you seen this article
3 before?
4 A. I might have. If so, it
5 was a while ago, and I don't really remember it.
6 65 Q. You are quoted in here.
7 Starting at the top of the second page:
8 "President Kevin Arriola
9 says those groups, and the
10 student union, have
11 misrepresented his club's
12 goals. He said their
13 membership is diverse and
14 discussion topics and
15 events include LGBT
16 issues, among other
17 'intersectional' causes."
18 Then there are some direct
19 quotes from you as it goes through the article.
20 Does that help refresh your
21 memory about having seen this article before?
22 A. Yes.
23 66 Q. I would like to mark this
24 as Exhibit 2.
25 EXHIBIT NO. 2: Newspaper

1 article dated April 12,
2 2016, from the Financial
3 Post.
4 MS. WOOD:
5 67 Q. In this article, on the
6 first page of the printout in the third big
7 paragraph, there is a quote from John Carpay, who
8 is the president of the Justice Centre for
9 Constitutional Freedoms. Have you had
10 conversations with Mr. Carpay? I don't want you
11 to tell me the contents, because that is with
12 counsel. Have you had discussions with Mr.
13 Carpay?
14 A. Not to my knowledge.
15 68 Q. How is it that he would
16 have come to know this information about your
17 group, then?
18 MR. MOORE: I think I might
19 have to object to some of this. This is
20 solicitor-client privileged areas.
21 MS. WOOD: I am not asking for
22 the contents. If he hasn't had any discussions
23 with Mr. Carpay, does he know how Mr. Carpay has
24 any knowledge about the group?
25 THE WITNESS: Let me just read

1 the quote. At this point, I don't think I have
2 spoken to him.
3 MS. WOOD:
4 69 Q. Okay. When CAFE put you
5 in touch with the Justice Centre for
6 Constitutional Freedom, to whom did they introduce
7 you?
8 A. I am not sure who it was
9 that I was originally speaking to. It could have
10 been Mr. Carpay, but I am not sure.
11 70 Q. It was definitely CAFE
12 that put you in touch with them?
13 A. Yes, originally. I went
14 to CAFE and asked them for advice after we got
15 denied. We said, "What is the next step? Is
16 there anything else we can do?" They said, "You
17 could try the Justice Centre," so we did.
18 71 Q. Is the Justice Centre for
19 Constitutional Freedoms representing MIAS on a pro
20 bono basis?
21 A. I believe so. We have
22 made an agreement to --
23 72 Q. I don't want to know
24 about your agreement. I just want to know if you
25 are being represented on a pro bono basis?

1 A. I think so, yes.
2 73 Q. Are you aware that the
3 Justice Centre for Constitutional Freedoms is
4 using the MIAS case as a basis for its own
5 fundraising?
6 A. Sure.
7 74 Q. I am going to show you a
8 letter from the Justice Centre for Constitutional
9 Freedoms dated October 14, 2016. Have you seen
10 this letter before?
11 A. No.
12 75 Q. On the third page of this
13 letter, the Justice Centre for Constitutional
14 Freedoms discusses the Men's Issues Awareness case
15 and uses it -- this is a fundraising solicitation,
16 and there are only two cases that are discussed in
17 the fundraising letter, and MIAS is one of them.
18 You hadn't seen this letter before today?
19 A. No.
20 76 Q. I am going to go back to
21 some of the questions I was talking with you
22 before about CAFE. You appeared at a CAFE
23 conference in September 2016. Correct?
24 A. Yes.
25 77 Q. I am going to show you a

1 printout from the CAFE web site. On the second
2 page of the handout, about two thirds of the way
3 down the page, you are listed as one of the
4 speakers. Correct?
5 A. Yes.
6 78 Q. Looking at this page,
7 does this appear to be a correct list of the
8 speakers that you recall from the conference?
9 A. Yes.
10 79 Q. I would like to mark this
11 as Exhibit 3, please.
12 EXHIBIT NO. 3: Printout
13 from CAFE web site.
14 MS. WOOD:
15 80 Q. I am going to take you
16 back to the MIAS Facebook page for a minute, which
17 is what we had marked as Exhibit 1. If I could
18 have you turn to page 7 of that, please. It is
19 the big document there with the binder clip.
20 The bottom of the page, the
21 Ryerson Men's Issues Awareness Society, September
22 28, 2016, there is a post that says, "Check out
23 Kevin Arriola, former president, give a speech at
24 the Canadian Association for Equality's first
25 national conference." Cut off and going onto the

1 next page, that is actually a link to the YouTube
2 clip of your conference speech. Correct?
3 A. Yes.
4 81 Q. Have you watched the
5 YouTube video?
6 A. Yes.
7 82 Q. Is it an accurate
8 recording of your presentation that you gave at
9 the CAFE conference?
10 A. Yes.
11 83 Q. Is there anything in that
12 presentation that you gave that you would like to
13 correct or amend?
14 A. Not right now.
15 84 Q. If anything comes to you
16 later, you can always correct the record later and
17 let your counsel know. He can tell me if there is
18 anything to correct or amend.
19 A. Sure.
20 85 Q. Are you familiar with the
21 blog Toronto Men Unite?
22 A. No.
23 86 Q. I am going to show you
24 the blog. I am not going to mark it as an
25 exhibit. I just want to show you the blog. This

1 Tree is a member of MIAS, that is relevant.
2 MR. MOORE: Okay, I will let
3 him answer that question.
4 THE WITNESS: No, I don't know
5 who Pine Tree is.
6 MS. WOOD:
7 87 Q. That was all I wanted to
8 know. If he was a member of MIAS, that would be
9 relevant.
10 I am going to be referring back
11 to the Facebook page, which is Exhibit 1. I want
12 to make sure I get the chronology straight. MIAS
13 applied for RSU status in October 2015. Correct?
14 A. Yes.
15 88 Q. I am not trying to trick
16 you on that. You applied for status in 2015?
17 A. Yes.
18 89 Q. When in 2015 did you
19 start to create MIAS, and what were you doing up
20 to October 2015 when you applied for group status?
21 A. Before that, I was trying
22 to get in contact with speakers to see if anyone
23 would come out to speak for any of our events. I
24 was recruiting. I was setting up our social media
25 pages and doing a lot of promoting, trying to get

1 is a printout from the blog. If I could have you
2 turn, please, to page 22 of 32, halfway down the
3 page, there is an entry on that page from a
4 blogger named Pine Tree, and he is discussing and
5 promoting an MIAS event. I just want to ask, do
6 you know who Pine Tree is?
7 REF MR. MOORE: I am going to
8 object to this as relevant.
9 MS. WOOD: He is promoting an
10 MIAS event. He could be an MIAS member.
11 MR. MOORE: This is not
12 related to the affidavit.
13 MS. WOOD: It is absolutely
14 related to his affidavit because it discusses one
15 of his events. It discusses an event, on the
16 second page, on 23, hosted by Ryerson's Men's
17 Issues Awareness Society, location, Canadian
18 Centre for Men and Family. That is in their
19 Facebook page. That is an event that they
20 promoted. I want to know if he knows who Pine
21 Tree is, who was promoting their event.
22 MR. MOORE: This is related?
23 Anyone who talks about an MIAS event is now
24 relevant to this application?
25 MS. WOOD: No, but if Pine

1 the word out. Stuff like that.
2 90 Q. Was MIAS hosting any
3 events at that point?
4 A. Prior to our application?
5 91 Q. Yes.
6 A. We had a meeting that was
7 just a general meeting amongst our members to sort
8 of not just introduce ourselves but also set a
9 game plan for the year to see what issues our
10 members cared about and what issues we would try
11 to tackle that year. That was sort of the purpose
12 of the first meeting before we officially applied.
13 92 Q. Do you recall
14 approximately how many people attended that
15 meeting?
16 A. I believe it was 11.
17 93 Q. If you could look at
18 Exhibit 1, please, and turn to page 14 of 36, at
19 the top of the page, there is a post from the
20 Ryerson Men's Issues Awareness, and it says, "Our
21 first discussion of the year is tonight." That is
22 an event that was held with the Canadian Centre
23 for Men and Families. Correct?
24 A. Yes, it was held at their
25 location.

1 94 Q. They gave you the space
2 to hold it?
3 A. Yes.
4 95 Q. Who is the Canadian
5 Centre for Men and Families?
6 A. It is a centre. They are
7 connected with CAFE. They are part of the same
8 thing. It is the centre where men go for
9 different types of support and stuff. They offer
10 one-on-one therapy support. They offer group
11 session support. They also have different
12 resources for men who were going through divorce,
13 who don't have their kids anymore, as well as men
14 who are abused.
15 It is just a centre where
16 different things happen, and they have a pretty
17 big space with lots of chairs, so they offered it
18 to us as space to have our speakers come out,
19 because we weren't allowed to do it at Ryerson.
20 96 Q. You weren't allowed to do
21 it at Ryerson?
22 A. We could do it, but we
23 didn't have the resources to pay for a big enough
24 room to have something like that.
25 97 Q. Approximately how many

1 out to the Student
2 Learning Centre on Yonge
3 and Gould from 12:30 to 4
4 p.m. We will be right by
5 the stairs."
6 Again, that is an on-campus
7 recruitment that was being run?
8 A. Yes.
9 101 Q. Thank you. Does MIAS
10 fundraise?
11 A. No, we haven't fundraised
12 yet.
13 102 Q. Has MIAS received any
14 funding from any groups?
15 A. No.
16 103 Q. Do you post any blogs?
17 A. No.
18 104 Q. I am going to show you a
19 screen capture of a Facebook post. It is under
20 the name Kevin Andres. Is this your Facebook
21 post?
22 A. Yes.
23 105 Q. I would like to mark this
24 as Exhibit 4, please.
25 EXHIBIT NO. 4: Facebook

1 people attended that event?
2 A. That one, I want to say
3 between 20 and 30. It wasn't just our members.
4 We also invited the U of T group to come out, and
5 we made it public. We advertised.
6 98 Q. Then approximately two
7 weeks later, on the 26th of January, on page 13 of
8 36, you have a second post, "Our second event of
9 the month is tonight. See you soon." That event
10 was held at a CAFE space. Correct?
11 A. Yes.
12 99 Q. If I could have you turn
13 to page 6 of 36 in that same exhibit, please, at
14 the top of the page, there is a post from October
15 19, 2016. It says, "We are recruiting today.
16 Come check us out in front of Lake Devo." That is
17 on campus? You were recruiting on campus?
18 A. Yes.
19 100 Q. On page 4 of 36, there is
20 a post at the top, Ryerson Men's Issues Awareness,
21 October 26, 2016:
22 "We will be back at it
23 tomorrow. Anyone who
24 would like to join us in
25 recruiting members, come

1 post under the name Kevin
2 Andres.
3 MR. MOORE: Can I ask a
4 question about this exhibit? It appears to be
5 incomplete.
6 MS. WOOD: Unfortunately, it
7 is a screen capture. It is literally a letter or
8 two off the end of each line that is cut off. We
9 could do a transcription of what we believe it is,
10 but it is literally a word or two cut off on the
11 end of each line. On the end of some lines. Not
12 even every line. Unfortunately, the post has been
13 deleted, so we could only use the screen capture
14 that we have.
15 MR. MOORE: I may be objecting
16 to this based on that, but we will see as we go
17 along. I haven't had a chance to review this.
18 MS. WOOD: As I said, I am
19 happy to provide a transcript and let your client
20 say whether or not he thinks it is accurate,
21 because it is literally a letter or two at the end
22 of some lines.
23 MR. MOORE: I am willing to
24 proceed with this.
25 MS. WOOD: I am not asking any

1 questions about it. I just wanted to know that it
2 was his Facebook page.
3 MR. MOORE: Okay.
4 MS. WOOD:
5 106 Q. I am going to show you a
6 Reddit post, as well. On this post at the top,
7 there is a posting from Kevin Arriola, president
8 of MIAS RU. Is that your posting on Reddit?
9 A. Yes.
10 107 Q. If you turn to pages 2
11 and 3 of the document, starting at number 4 and
12 continuing on to the end of the document, is that
13 your text starting at number 4 and continuing to
14 the end of 4, and then it goes 6, 7, and there is
15 a topic of patriarchy, toxic, MAS/FEM. Is that
16 your text?
17 A. Let me just read it.
18 Starting from where?
19 108 Q. The bottom of page 2 at
20 number 4.
21 A. Yes.
22 109 Q. That is yours?
23 A. Yes.
24 110 Q. Does that continue on
25 page 3, 6, and 7? Page 3. You see numbers 6 and

1 down to the RSU in the application. Correct?
2 A. Yes, her name is in the
3 application.
4 114 Q. I know you and Ms.
5 Godlewski were students. Was the third member a
6 student?
7 A. Yes.
8 115 Q. How did you come to meet
9 Ms. Godlewski and this other person?
10 A. The other person, I met
11 her in class. She was in my program, so we had
12 taken lots of classes together, and I told her
13 about my interest in starting a group, and she was
14 super-excited to join it.
15 How did I get in contact with
16 Alex? I am not really sure. I think she got in
17 contact with me or something like that. It turns
18 out she was a semi-popular blogger or blogger on
19 YouTube. She used to go by the name of Alexandra
20 Blue. We somehow got in contact together, and she
21 told me that it was great, and I asked her if she
22 wanted to run our social media pages.
23 116 Q. You also mentioned
24 earlier that the executive is currently changing,
25 and there are only two members of the executive at

1 7. Is that still your text there?
2 A. Sure. Where is 7,
3 though? Right.
4 111 Q. That is still your text?
5 A. Yes.
6 112 Q. We are going to mark that
7 as an exhibit, as well, please. That will be
8 Exhibit 5.
9 EXHIBIT NO. 5: Reddit
10 post from Kevin Arriola,
11 president of MIAS RU.
12 MS. WOOD: I would just like
13 to take a minute to confer with my co-counsel, but
14 I think I may be done.
15 --- Recess taken at 10:46 a.m.
16 --- Upon resuming at 10:57 a.m.
17 MS. WOOD:
18 113 Q. I just have a couple of
19 last questions for you about the executive of
20 MIAS.
21 You mentioned that originally
22 there were three executive members: You,
23 Alexandra Godlewski, and a third person. That
24 third person you said wished to remain anonymous,
25 but surely you would have had to put their name

1 the moment. Correct?
2 A. Yes, Sarah has someone
3 else, but I am not sure who it is.
4 117 Q. There are two members of
5 the executive?
6 A. Well, I know the other
7 one for sure, but I think she has someone else if
8 they are going to apply again, because they will
9 need two executives besides the president. If
10 they do apply, I think she has someone on reserve
11 just in case. I might also step up as an
12 executive.
13 118 Q. Sarah and these other two
14 people, are they all students?
15 A. Yes, you have to be a
16 student to be in the executive.
17 119 Q. Are all of MIAS's members
18 students?
19 A. Yes, but we do have
20 unofficial members. Right now, because we are not
21 an official student group, they are all the
22 members, but to be an official member, you have to
23 be a member of the RSU. You have to be a
24 full-time student kind of thing. If we were to
25 become official, some of them wouldn't be voting

1 members, but they could still come to our meetings
2 and stuff.

3 MS. WOOD: Perfect. Those are
4 my questions. Thank you very much.

5 --- Whereupon the proceedings adjourned
6 at 11:01 a.m.

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