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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION  
HONORABLE DAVID O. CARTER, U.S. DISTRICT JUDGE

CLAUDIA CIAMPA,	)	
	)	
Petitioner,	)	<b>Certified Transcript</b>
	)	
vs.	)	Case No.
	)	8:24-cv-2556-DOC-ADS
ERIC HOWARD NICHOLS,	)	
	)	
Respondent.	)	<b>DAY 1, VOLUME I</b>
	)	

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BENCH TRIAL  
REPORTER'S TRANSCRIPT OF PROCEEDINGS  
MONDAY, FEBRUARY 3, 2025  
1:32 P.M.  
SANTA ANA, CALIFORNIA

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1                   **SANTA ANA, CALIFORNIA; MONDAY, FEBRUARY 3, 2025**

2                                   **1:32 P.M.**

3   - - -

4

01:32PM 5                   THE COURT: All right, Counsel, on the afternoon  
6 matter, Claudia Ciampa vs. Eric Howard Nichols. Why don't you  
7 come forward and be seated. It's nice seeing all of you folks.  
8 That means come up and be seated, please.

9                   Now, from the plaintiff, please.

01:34PM 10                  MR. QUINN: Good morning, Your Honor. Stephane  
11 Quinn of Quinn & Dworakowski for Ms. Ciampa.

12                  THE COURT: I'm sorry, there's a microphone next to  
13 you.

14                  Thank you.

01:34PM 15                  MR. QUINN: Good afternoon, Your Honor. Stephane  
16 Quinn of Quinn & Dworakowski.

17                  THE COURT: Thank you. Pleasure.

18                  MR. DWORAKOWSKI: Good afternoon, Your Honor. David  
19 Dworakowski, also Quinn & Dworakowski.

01:34PM 20                  THE COURT: Pleasure.

21                  Now, your client is present?

22                  MR. DWORAKOWSKI: She is.

23                  THE COURT: Thank you.

24                  Counsel on the defense?

01:34PM 25                  MR. BERMAN: Good afternoon. Brett Berman and Jeff



1 Layfield on behalf of the respondent, Eric Nichols. All  
2 present.

3 THE COURT: Your client's present.

4 Your opening statement, Counsel, on behalf of the  
01:35PM 5 plaintiff.

6 ***PETITIONER'S OPENING STATEMENT***

7 MR. QUINN: Good afternoon, Your Honor. May it  
8 please the Court.

9 Your Honor, we are here pursuant to the filing of  
01:35PM 10 mother, Claudia Ciampa, of a petition under the Hague  
11 Convention for the return of her minor child, Ethan Joseph  
12 Nichols, to his home in Italy. Her petition was initially  
13 filed in the Orange County Superior Court and later removed by  
14 respondent to this federal court.

01:36PM 15 In order to prevail on her petition, mother must  
16 demonstrate by a preponderance of the evidence that Ethan's  
17 relocation violated her custody rights recognized under the  
18 laws of Ethan's habitual residence.

19 Your Honor, mother will present evidence that will  
01:36PM 20 convincingly establish that when 6-month-old Ethan was taken  
21 from her on August 30th, 2024, and flown from Italy to  
22 California without her knowledge and her consent, that Italy  
23 was Ethan's home and habitual residence.

24 Mother will also show that father's unlawful taking  
01:36PM 25 was in breach of her custodial rights, which she was exercising

1 at the time of the abduction. It's anticipated that father  
2 will raise one of the defenses listed in the Hague Convention,  
3 specifically that prior to his departure from Italy with her  
4 son, mother was abusive to both him and Ethan, and that there  
01:37PM 5 is a grave risk that returning Ethan to his home in Italy will  
6 expose him to physical and psychological harm or otherwise  
7 place him in an intolerable position -- situation.

8 But apart from his self-serving statements,  
9 Your Honor, father will be unable to produce evidence, much  
01:37PM 10 less clear and convincing evidence, as is required to support  
11 such an absurd claim. In fact, the evidence will show that  
12 mother, who has three other children, Chiara, C-h-i-a-r-a, who  
13 is 18 years old; Ettore, which is spelled E-t-t-o-r-e, who is  
14 11 years old; and Clelia, C-l-e-l-i-a, who is 10 years old, is  
01:38PM 15 a fantastic mother.

16 Chiara, who is in the United States with Claudia,  
17 will testify to her mother's love, her devotion and dedication  
18 to all her children, including little Baby Ethan. In the end,  
19 Your Honor, we believe that this Court will agree that Ethan's  
01:38PM 20 removal from Italy was unlawful and that he must be returned to  
21 Italy, his home, with his mother.

22 Thank you, Your Honor.

23 THE COURT: All right. Thank you.

24 Counsel, your opening statement for the defense.

01:38PM 25 MR. BERMAN: Thank you, Your Honor.

**RESPONDENT'S OPENING STATEMENT**

MR. BERMAN: May it please the Court.

The parties, Petitioner Claudia Ciampa and Respondent Eric Nichols, are the parents of Ethan Joseph Nichols; date of birth, February 13th, 2024.

The law is clear, Your Honor, as set forth in *Monasky vs. Taglieri*, that if Ms. Ciampa cannot prove by a preponderance of the evidence that Italy was Ethan's habitual residence on August 30th, 2024, when Mr. Nichols took Ethan back to their previously agreed-upon home, the United States, that Ethan must not be ordered back to Italy and must be ordered to stay in California.

In addition, pursuant to *Nisbet vs. Bridger*, which is a very new -- which is a very new case, if this Court finds that Ethan had no habitual residence on August 30th, 2024, also Ethan, then, must not be returned to Italy and must stay here in California for the Court to decide the custody contest.

Why is this the case? Because, as set forth in Hague Convention Article III and *Mozes vs. Mozes*, *Monasky vs. Taglieri*, and *Wipranik vs. Superior Court*, the Hague Convention procedures are an available remedy in the United States when a child under 16 has been wrongfully removed or retained in a ratifying country on or after July 1, 1998.

The child is wrongfully removed or retained only if, two things: One, the child's habitual residence just before

1 the taking was in a ratifying country; and number two, the  
2 child was removed from a person who was exercising lawful  
3 custody rights.

4 As set forth in *Murphy vs. Sloan*, to invoke the  
01:40PM 5 Convention, the removal or retention of the child must have  
6 occurred from the place of their habitual residence. The Court  
7 in *Monasky* states, quote:

8 "The term 'habitual residence' is not defined  
9 by the Convention. The Supreme Court, however, has  
01:41PM 10 considered the Circuit Court's varying approaches  
11 and concluded that a child's habitual residence  
12 depends on the totality of the circumstances  
13 specific to the case, not on categorical  
14 requirements, such as an actual agreement between  
01:41PM 15 the parties. Moreover, locating a child's 'home'  
16 is a fact-driven inquiry that must be sensitive to  
17 the unique circumstances of the case and informed  
18 by common sense."

19 The Court in *Watts vs. Watts* stated:

01:41PM 20 "The Convention does not require a District  
21 Court to determine where a child habitually  
22 resides. Instead, the Convention requires that a  
23 District Court" -- excuse me -- "Instead, the  
24 Convention requires a District Court to determine  
01:42PM 25 whether the child habitually resides in the

1 location that the petitioner claims."

2 The Court in *Pope vs. Lunday* states:

3 "Although *Monasky* did away with the  
4 presumption that a child's habitual residence was  
01:42PM 5 determined by the parents' shared parental intent,  
6 the parents' intent does remain a consideration in  
7 determining habitual residence" -- particularly,  
8 Your Honor -- "in a case of an infant" -- which is  
9 what we have here -- "therefore, the approach is  
01:42PM 10 taken by the Courts to determine the parents'  
11 intent may still be relevant."

12 Ethan was born in the U.S. and was only in Italy for  
13 an agreed-upon temporary sojourn from ages -- from the age of  
14 2 months to 6 months. As mother admits in her deposition and  
01:43PM 15 as the messages between the parties make abundantly clear, it  
16 is undisputed that Mr. Nichols, the father, never intended to  
17 live in Italy. And the only reason the parties were back in  
18 Italy after the child was born here and -- was so that mother  
19 could work things out with the father of her other two children  
01:43PM 20 from a previous marriage who she -- from a previous marriage.

21 When the parties were here, when the child was born,  
22 the mother, Claudia Ciampa, had her children from her other  
23 relationship, two of them, and enrolled them in elementary  
24 school in the United States. If Ms. Ciampa never intended to  
01:44PM 25 live in the United States, then she certainly misled

1 Mr. Nichols, as evidenced by her numerous messages indicating  
2 her intent to live in the United States, including looking up  
3 houses in the United States and enrolling her two older  
4 children, as I said, in school in the U.S.

01:44PM 5 The only reason, Your Honor, that Ethan was kept in  
6 Italy longer than a couple of months was due to the mother's  
7 coercive behavior, which, as set forth in *Pope* and in *Nisbet*,  
8 cannot be used to determine habitual residence. The children  
9 in *Nisbet* were enrolled in school in Scotland and stayed there  
01:44PM 10 with mother and the father for four years. Still, in that  
11 case, the Court found -- did not find that Scotland was the  
12 child's habitual residence.

13 I just want to take a moment to mention this issue  
14 of Mr. Nichols' prior counsel. I think it's important and I  
01:45PM 15 think it's an extraordinary situation where a party would  
16 disclose attorney-client communications, but in this case, I  
17 think it is certainly necessary.

18 Mr. Nichols asked his attorneys, prior counsel,  
19 who's no longer on this case, numerous times before he came to  
01:45PM 20 the U.S. with Ethan and immediately when he arrived in the U.S.  
21 with Ethan, one, whether he should disclose the location of the  
22 child; and two, whether he should file any paperwork regarding  
23 him having the child in the U.S.

24 The legal advice was totally misguided, totally  
01:45PM 25 wrong, and totally treacherous, frankly, because, as the

1 evidence is going to show, Mr. Nichols, who was relying on  
2 these attorneys, was consistently telling him, "Do not disclose  
3 the location, and you do not have to file any paperwork being  
4 in the U.S."

01:46PM 5 Had he been given proper legal advice, Mr. Nichols  
6 would have filed for a domestic violence restraining order and  
7 reported to the District Attorney's Office within ten days of  
8 being here, and he would have filed for custody within 30 days  
9 of arriving in the U.S. Had he done those two things, which  
01:46PM 10 the law in California clearly says he should, he would still  
11 have custody of the minor child in California. There would be  
12 no Hague Convention proceeding. This case would not be a  
13 federal case with the federal court, frankly, wasting the  
14 Court's time with these types of issues that can be handled in  
01:46PM 15 state court.

16 Mr. Nichols would not have had Ethan taken from him.  
17 He would not be facing restitution by the District Attorney's  
18 Office. And, frankly, he would not be an emotional wreck,  
19 as he's experiencing significant issues right now because of  
01:47PM 20 this whole ordeal.

21 Several third parties will testify, Your Honor --  
22 two of them. One is William La Via. He will testify that he  
23 discussed with both the mother and the father several times in  
24 the U.S. and in Italy their mutual intent to live in the U.S.  
01:47PM 25 and only to return to Italy temporarily; and Marianne Allen,

1 who will testify that between February and August of 2024, she  
2 discussed with the parties multiple times their intent to live  
3 in the U.S. and only go back to Italy temporarily.

4 Lastly, Your Honor, Ms. Ciampa has attempted to  
01:47PM 5 influence one of these prospective witnesses, Marianne Allen's,  
6 testimony. She did this by, after finding out that Marianne  
7 had agreed with Mr. Nichols, sending her threatening messages,  
8 accusing her of being an accomplice to Eric's supposed crime,  
9 and that she is not sensible or trustworthy. That's our  
01:48PM 10 Exhibit X.

11 Lastly, Your Honor, if the Court does find that  
12 Italy is the habitual residence, there will be issues raised  
13 regarding grave risk of return to Italy, number one.  
14 Number two, Mr. Nichols will be arrested upon his return to  
01:48PM 15 Italy and that's, frankly, based on the advice he was receiving  
16 by counsel in the U.S.

17 Mr. Nichols will testify that he may not see this  
18 child until the child is 14 years of age, and the mother has  
19 committed significant domestic violence.

01:48PM 20 Thank you.

21 THE COURT: Counsel, your first witness.

22 MR. DWORAKOWSKI: We do have a witness in court that  
23 I'd ask to be excluded, Your Honor.

24 THE COURT: All right. Please.

01:49PM 25 MR. QUINN: Your Honor, we call --



1 THE COURT: Why don't we make that a blanket order,  
2 Counsel.

3 Witnesses who may be testifying, we're going to ask  
4 you to remain out in the hallway. That's to protect your own  
01:49PM 5 credibility; okay? So if you're going to be a witness in this  
6 matter, if you'll remain out in the hallway so you can't hear  
7 other witnesses testify.

8 Now, Counsel, look around and see if you have any  
9 witnesses prospectively; okay?

01:49PM 10 MR. QUINN: We do not, Your Honor.

11 THE COURT: All right. Counsel, thank you very  
12 much.

13 If you'd be seated here.

14 MR. QUINN: Your Honor, as our first witness, we  
01:49PM 15 call --

16 THE COURT: Counsel, just a moment. Thank you.

17 Now, would you put the binder down, please, and  
18 please raise your right hand.

19 THE WITNESS: Yes, sir.

01:50PM 20 **CLAUDIA CIAMPA, PETITIONER, IS SWORN**

21 THE COURT: If you would please be seated. And  
22 after you are comfortable, would you move your chair closer to  
23 the microphone, and then bend the microphone down to you so we  
24 can hear you.

01:50PM 25 THE WITNESS: Is that okay?

1 THE COURT: Yes.

2 Do you speak English?

3 THE WITNESS: I do.

4 THE COURT: We'll make certain that the questions  
01:50PM 5 are slow also so that you can understand and respond. And if  
6 at any time you don't understand a question, please notify your  
7 attorney and the Court.

8 THE WITNESS: Thank you.

9 THE COURT: What's your full name?

01:50PM 10 THE WITNESS: Claudia Ciampa.

11 THE COURT: Would you spell your first name?

12 THE WITNESS: C-l-a-u-d-i-a.

13 THE COURT: And your last name?

14 THE WITNESS: C-i-a-m-p-a.

01:50PM 15 THE COURT: Thank you.

16 This would be direct examination.

17 MR. QUINN: Thank you, Your Honor.

18 **DIRECT EXAMINATION**

19 BY MR. QUINN:

01:50PM 20 Q Good afternoon, Claudia.

21 A Good afternoon.

22 Q May I call you Claudia?

23 A Of course.

24 Q Thank you.

01:50PM 25 Claudia, where is your home?

1 A I live in Piano di Sorrento in Italy.

2 Q Which part of Italy is that?

3 A South, near Naples.

4 Q How long have you resided in Piano di Sorrento?

01:51PM 5 A All my life.

6 Q When you say all your life, literally all your life?

7 A Yes.

8 Q How old are you now?

9 A 46.

01:51PM 10 Q Have you had periods where you moved outside of Piano di  
11 Sorrento?

12 A I lived for ten months in Canada when I was 18, and few  
13 months in Australia for some experiences.

14 Q Okay. Have you lived outside of the city of Piano di  
01:51PM 15 Sorrento, anywhere else in Italy?

16 A No.

17 Q And where do you -- the property where you reside, do you  
18 own that or rent it?

19 A I own it.

01:51PM 20 Q And how long have you lived in this particular residence?

21 A All my life.

22 Q Was it the -- your parents' home?

23 A Yes.

24 Q And when did it become your own property?

01:52PM 25 A In 2019.

1 Q Do you have any other children?

2 A I have four children. Yes.

3 Q So how old is your oldest child?

4 A Chiara is 19 years old.

01:52PM 5 Q And who is her father?

6 A Paolo Pastorino.

7 Q And did you -- were you ever -- strike that.

8 The relationship with Chiara's father, at some point  
9 it ended?

01:52PM 10 A Yes.

11 Q How old was Chiara?

12 A 1 year and 3 months old.

13 Q And following your separation from her father, who had  
14 custody of Chiara?

01:52PM 15 A Both of us, but she was living with me.

16 Q Primarily?

17 A Yes.

18 Q And did father have custody, parenting time, with Chiara?

19 A Of course.

01:53PM 20 Q And did this continue until Chiara became an adult?

21 A Yes.

22 Q And let's talk about your other children, the younger  
23 ones. How old are they?

24 A Ettore is 11 years old; Clelia, 9 years old.

01:53PM 25 Q Their father, what is his name?

1 A Luigi Porzio.

2 Q Were you married to Mr. Porzio?

3 A Yes. After having the children, though.

4 Q Okay. And are you currently in a relationship with

01:53PM 5 Mr. Porzio?

6 A No. We are separated.

7 Q When did that happen?

8 A 2022, January.

9 Q And do you share custody with Mr. Porzio of the children?

01:53PM 10 A I do.

11 Q What is the custody schedule that you currently have with

12 Mr. Porzio?

13 A So my children with him goes to his place every other  
14 weekend from Friday night to Sunday night. He also gets to see  
01:54PM 15 the children one afternoon every week and two weeks in the  
16 summertime.

17 Q Do you have --

18 THE COURT: Let me repeat that back.

19 You alternate weekends?

01:54PM 20 THE WITNESS: Yes.

21 THE COURT: He has two of the children?

22 THE WITNESS: Yes.

23 THE COURT: On Thursday night?

24 THE WITNESS: Yes. One -- yeah.

01:54PM 25 THE COURT: Each week?

1 THE WITNESS: Yes.

2 THE COURT: And he has two weeks of what I call  
3 continuous time in the summer?

4 THE WITNESS: Exactly.

01:54PM 5 THE COURT: Now, just a moment. "Estaria," am I  
6 pronouncing that correctly?

7 THE WITNESS: I'm sorry?

8 THE COURT: Your second child who's 11 years old.

9 THE WITNESS: Ettore.

01:55PM 10 THE COURT: Could you spell that for me very slowly?

11 THE WITNESS: Yes. E-t-t-o-r-e.

12 THE COURT: And could you spell Chiara's name for me  
13 very slowly? The 19-year-old.

14 THE WITNESS: Oh, Chiara. C-h-i --

01:55PM 15 THE COURT: I'm sorry, C like "cat"?

16 THE WITNESS: Yes.

17 THE COURT: C- --

18 THE WITNESS: C-h-i-a-r-a.

19 THE COURT: And she's 19?

01:55PM 20 THE WITNESS: She is 19, yes.

21 THE COURT: Just one moment.

22 Ettore?

23 THE WITNESS: Ettore.

24 THE COURT: She's 11?

01:55PM 25 THE WITNESS: He.

1 THE COURT: Oh, it's he?

2 THE WITNESS: Yes.

3 THE COURT: Is 11?

4 THE WITNESS: Yes.

01:55PM 5 THE COURT: And the 9-year-old, once again, would  
6 you spell the name very slowly for me.

7 THE WITNESS: C-l-e-l-i-a.

8 THE COURT: C-l-e --

9 THE WITNESS: -l-i-a.

01:55PM 10 THE COURT: Would you pronounce that for me.

11 THE WITNESS: "Clelia."

12 THE COURT: Boy or girl?

13 THE WITNESS: Girl.

14 THE COURT: She is 9?

01:56PM 15 THE WITNESS: Yes, Your Honor.

16 THE COURT: Thank you.

17 MR. QUINN: Thank you, Your Honor.

18 BY MR. QUINN:

19 Q Do you have any parents still living in Italy?

01:56PM 20 A I do. My mom.

21 Q And does your mother live with you?

22 A She lives next door.

23 Q And do you have any other relatives, like a brother or a  
24 sister?

01:56PM 25 A Yes.

1 Q And where do they live?

2 A Okay. I have one brother with his family living next door  
3 as well. Then I have my older sister, lives in the same town.

4 One brother lives next door to me. And -- is that it? And

01:56PM 5 then three other brother and sister -- two other brothers and  
6 one sister live in Italy, but not in the same village.

7 Q And do you have extended family, like aunts and uncles,  
8 that are still in Italy?

9 A Of course. Yes, all my family.

01:57PM 10 Q Do you have any family members residing in the  
11 United States?

12 A No.

13 Q I want to turn to your relationship with Mr. Nichols.

14 Do you remember when you first met Mr. Nichols?

01:57PM 15 A I do.

16 Q When was that?

17 A It was about 13 years ago. And we met in a café where he  
18 was giving conversation in English as a -- to promote his  
19 business.

01:57PM 20 Q Okay. And --

21 THE COURT: To promote his --

22 THE WITNESS: Business.

23 THE COURT: Business.

24 THE WITNESS: Yes. He --

01:57PM 25 BY MR. QUINN:



1 Q What was his business, if you remember?

2 A Yes. He teaches English.

3 Q Like a tutor?

4 A Yes. Privately.

01:57PM 5 Q And when you first met Mr. Nichols -- you said about ten  
6 years ago; is that correct?

7 A About 13 years ago, yes.

8 Q My apologies, 13 years ago.

9 Did you have a romantic relationship with  
01:58PM 10 Mr. Nichols at that time?

11 A Yes.

12 Q And how long did that relationship last?

13 A About one year.

14 Q At the time, based on the age of Chiara, you were a  
01:58PM 15 single mother; is that correct?

16 A Yes.

17 Q So your relationship lasted one year. And after that,  
18 did you remain in contact with Mr. Nichols?

19 A We remained in contact for a while, and then we stopped,  
01:58PM 20 and we kept in contact again later on.

21 Q Okay. At some point you had two additional children;  
22 correct?

23 A Correct.

24 Q And you married.

01:58PM 25 When did you marry Mr. Porzio?

1 A It was 2017.

2 Q And when did you separate?

3 A 2022.

4 Q It's my understanding that you -- that you started a new  
01:59PM 5 relationship with Mr. Nichols around that time?

6 A Yes.

7 Q Do you remember when?

8 A I think it was October -- yeah. It might have -- it was  
9 the summer of 2022.

01:59PM 10 Q Now, this relationship was a romantic relationship?

11 A Yes.

12 Q When did you become pregnant of Ethan? When did you find  
13 out you were pregnant of Ethan?

14 A I found out in June 2023.

01:59PM 15 Q So about a year later?

16 A Yes.

17 Q And were you -- and Mr. Nichols, were you actively trying  
18 to have a baby?

19 A Yes.

01:59PM 20 Q So let's talk about your relationship during that --  
21 during when you started with Mr. Nichols in 2022 and until you  
22 had Ethan in 2024.

23 How would you describe your relationship with  
24 Mr. Nichols?

02:00PM 25 A We started to date again while I was -- I just broke up

1 with my ex-husband, so I was a bit -- it was a very delicate  
2 moment for me. And I remembered how much I loved him  
3 previously. So this time he seemed so involved as he wasn't  
4 the first time, I thought it would have been nice to try again  
02:00PM 5 to stay with him, even though, again, I was in a very difficult  
6 moment. So...

7 Q Let me be more specific. Let me direct you a little bit  
8 more.

9 Your relationship, would you describe it as a very  
02:01PM 10 affectionate one?

11 A Yes.

12 MR. BERMAN: Objection. Leading.

13 THE COURT: Well, it is, Counsel, but you can reask  
14 the question.

02:01PM 15 BY MR. QUINN:

16 Q When I ask you how to describe, I mean more specifically,  
17 so I don't want you to tell me every little detail. How would  
18 you describe your relationship specifically with Mr. Nichols?

19 A We were dating. We were seeing each other very often.  
02:01PM 20 We -- soon we started to sleep together. So, like, partners.

21 Q At some point did you begin living in the same residence?

22 A I wouldn't say that because he always -- he rented a house  
23 in Sorrento that never left. So, yes, he was coming to my  
24 place to sleep almost every night, but he never actually moved  
02:02PM 25 to my place.

1 Q And even when you became pregnant?

2 A Yes.

3 Q Now, did you know during this time that Mr. Nichols --  
4 strike that.

02:02PM 5 Did Mr. Nichols make it clear to you during this  
6 time period, from when you began dating in summer of 2022 until  
7 you had your -- Ethan in 2024, did Mr. Nichols make it clear  
8 that he wanted to move back to the United States?

9 A He always complained about Italy and Italians, but when we  
02:03PM 10 start dating, he told me that he wanted -- he was thinking to  
11 move to Poland, in Krakow, but because he loved me, he would  
12 have stayed in Italy for me. With the time, he started to ask  
13 me to move to America.

14 THE COURT: I'm sorry, would you repeat that? "He  
02:03PM 15 asked me to..."

16 THE WITNESS: To move to America.

17 THE COURT: To America. Okay.

18 THE WITNESS: Yes.

19 BY MR. QUINN:

02:03PM 20 Q To be clear, you are not married to Mr. Nichols; correct?

21 A Correct.

22 Q Did Mr. Nichols ever propose to you?

23 A No.

24 Q Did he ever -- you are not an American citizen, are you?

02:03PM 25 A I'm not.

1 Q Are you a legal resident of the United States?

2 A I'm not. I'm a tourist.

3 Q A tourist.

4 And do you have a work visa allowing you to work in  
02:04PM 5 the United States?

6 A I don't.

7 Q In the period from summer of 2022 to when your child was  
8 born in February of 2024, did you apply for any type of  
9 immigration application to move to the United States?

02:04PM 10 A No, I don't.

11 Q You didn't fill out -- did you go see an immigration  
12 attorney during this time?

13 A No.

14 Q Did Mr. Nichols tell you what his plan was for you to  
02:04PM 15 remain in the United States if you came here?

16 A He was telling me that it would have been easier to find a  
17 job. We could have had a nicer house. But we were talking  
18 about moving, but, of course, I have my other children that are  
19 minors.

02:05PM 20 Q Okay. Ma'am, thank you, but I want you to focus on my  
21 question.

22 A Yes.

23 Q My question was: Did Mr. Nichols tell you how exactly  
24 you were -- you would be able to remain in the United States  
02:05PM 25 once you traveled here?

1 A He would eventually have married me, I think.

2 Q Did he tell you that?

3 A Yeah, he was talking about marrying, but we never -- he  
4 never proposed.

02:05PM 5 Q At some point the discussion of having -- of you giving  
6 birth in the United States began; correct?

7 A Correct.

8 Q Do you remember when that started?

9 A About October 2023.

02:06PM 10 Q And who brought up this idea of you traveling to the  
11 United States to give birth?

12 A Eric did.

13 Q And did he tell you why he wanted you to do that?

14 A Okay. So the first reason why we should have come to  
02:06PM 15 America was that he could have been for sure present at the  
16 birth of our child because in Italy, it depends on the doctor  
17 of the hospital. He -- the doctor can decide if the father can  
18 be in the room or not, depending on the case. For example, in  
19 case of C-section, for sure the father cannot be there.

02:07PM 20 Q Okay. And it was -- did Mr. Nichols advise you that it  
21 was important for him to be inside the operating room?

22 A Yes.

23 Q And did you -- you have three other children. How were  
24 they delivered?

02:07PM 25 A I'm sorry?

1 Q Your three children, did you have a C-section for them?

2 A I haven't, no, for none of them.

3 Q Okay.

4 MR. QUINN: I would ask the Court mark for

02:07PM 5 identification Petitioner's Exhibit 14, which is a WhatsApp  
6 conversation between petitioner and respondent. The exhibit  
7 starts on January 10, 2024, through January 12, 2024. It's a  
8 two-page document.

9 THE COURT: All right. It will be marked 14.

02:08PM 10 BY MR. QUINN:

11 Q Ma'am, if you could take a --

12 THE COURT: I'm sorry, Counsel?

13 MR. BERMAN: I'd like to make an objection to any of  
14 the exhibits that have been submitted by the petitioner today.

02:08PM 15 We only received those today at about 12:53 p.m., and the Court  
16 had an order on January 15th of 2025 that clearly set forth  
17 that the parties were supposed to submit affidavits, documents,  
18 things supporting their defenses and their cases. We didn't  
19 receive any of that. So this is prejudicial, Your Honor.

02:08PM 20 THE COURT: Counsel?

21 MR. QUINN: Your Honor, we received the exhibits --  
22 their exhibits this afternoon outside the door right now. I'm  
23 confused as to the prejudiced nature, also, considering these  
24 are documents that were in --

02:09PM 25 THE COURT: Well, just a moment. I don't know what

1 these documents are yet.

2 MR. QUINN: Well, for example, this exhibit.

3 THE COURT: I don't know what this document is yet.

4 MR. QUINN: All of the exhibits that we submitted

02:09PM 5 are all exhibits that had been in the possession of both

6 parties for weeks.

7 THE COURT: Okay. Counsel, have you had this  
8 document previously? Number 14, Exhibit 14. Simple question,  
9 yes or no?

02:09PM 10 MR. BERMAN: Some of them -- I'll tell you right  
11 now --

12 THE COURT: Counsel, Number 14, yes or no?

13 MR. BERMAN: No, Your Honor. Not until this  
14 morning. Some of them, but not that one.

02:09PM 15 THE COURT: Well, we'll get to some of them in just  
16 a moment.

17 Did they have Exhibit 14 previously?

18 MR. QUINN: Your Honor, it's one of their exhibits.

19 THE COURT: One of their exhibits?

02:09PM 20 MR. QUINN: One of their exhibits. So I don't know  
21 what they are talking about.

22 THE COURT: Just a moment.

23 Counsel?

24 MR. BERMAN: It is not one of our exhibits.

02:09PM 25 THE COURT: Well, we'll settle this very quickly.



1 Thank you, Counsel. The two of you walk over and --

2 MR. QUINN: Your Honor --

3 THE COURT: No, just a moment. Show it to counsel.

4 MR. QUINN: If I may, Your Honor. Instead of

02:10PM 5 wasting the Court's time, may I just come back to it? I --

6 THE COURT: No. Exhibit 14. You may not.

7 MR. QUINN: Very well, Your Honor.

8 THE COURT: Let's see who's got their credibility  
9 here at stake right to begin with.

02:10PM 10 Exhibit 14. Statement is it's one of their  
11 exhibits.

12 MR. QUINN: Your Honor, it was an exhibit at the  
13 deposition --

14 THE COURT: The statement is it's one of their  
02:10PM 15 exhibits. That's your statement. What is it?

16 MR. QUINN: I may have been mistaken, Your Honor --

17 THE COURT: Okay. So just a moment. You misspoke.  
18 Let me write that down.

19 MR. QUINN: I misspoke. It was an exhibit in their  
02:11PM 20 deposition of my client.

21 THE COURT: Okay. So deposition of your client.

22 MR. QUINN: Yes.

23 THE COURT: Now, Counsel, you should have received a  
24 deposition of the client. Did you receive this? Since there  
02:11PM 25 were depositions, you must have received it.

1 MR. BERMAN: Yes, Your Honor.

2 THE COURT: Okay. So you're both off to an  
3 inauspicious start; all right?

4 MR. QUINN: My apologies, Your Honor. I just --

02:11PM 5 THE COURT: Don't do it again, each of you. Don't  
6 waste my time. Understood? Am I clear?

7 MR. BERMAN: You're clear.

8 THE COURT: I'm not going to waste time with the  
9 deposition you already had.

02:11PM 10 All right. Counsel, your question.

11 MR. QUINN: Thank you, Your Honor.

12 BY MR. QUINN:

13 Q Ma'am, can you take a look at Exhibit 14?

14 A Yes.

02:11PM 15 Q Do you recognize this as a conversation string between  
16 you and Mr. Nichols?

17 A Yes.

18 Q And, ma'am, at the very --

19 MR. QUINN: Your Honor, at this time, I would ask  
02:11PM 20 that Exhibit 14 be moved into the record.

21 THE COURT: Received.

22 MR. QUINN: Thank you.

23 **(Exhibit Number 14 received.)**

24 BY MR. QUINN:

02:11PM 25 Q Ma'am, at the very bottom of the exhibit, Mr. Nichols

1 lists questions that you should ask the doctor; is that  
2 correct?

3 A Yes.

4 Q And of these questions, he specifically says that he must  
02:12PM 5 be able to stay with you the entire time in the room; correct?

6 A Yes. Correct.

7 Q Thank you.

8 Did you always agree to come to the United States  
9 with Mr. Nichols to give birth?

02:12PM 10 A We were trying to find a solution around my place. In  
11 fact, in this exhibit, it's mentioned Clinica Mediterranea --

12 Q Can you spell that for the Court, please?

13 A Yes. It's Clinica, C-l-i-n-i-c-a; Mediterranea,  
14 M-e-d-i-t-e-r-r-a-n-e-a.

02:13PM 15 Q Thank you.

16 What were you going to say about that clinic?

17 A It's -- this clinic is in Naples. And because my place is  
18 about an hour drive from Naples, I was afraid that the baby  
19 could have been born in the car during the trip.

02:13PM 20 Q Okay. So you made attempts -- did you make attempts in  
21 Italy to find a hospital that would allow Mr. Nichols to be  
22 present during the birth?

23 A Yes. Absolutely, yes.

24 Q You did not find any?

02:13PM 25 A We were also thinking of asking a lady to come to my place

1 because I could have delivered at home.

2 Q Okay. But my question was you didn't find any hospitals  
3 that would agree?

4 A No. Sorry.

02:14PM 5 Q Did your agreement with Mr. Nichols to come to the  
6 United States to give birth, did that agreement extend to you  
7 remaining in the United States with Ethan following the birth?

8 A Absolutely not.

9 Q Would Mr. Nichols have any kind of evidence to  
02:14PM 10 demonstrate that you had agreed to anything like that?

11 A He doesn't.

12 Q Were there any discussions with Mr. Nichols about moving  
13 somewhere else other than the United States?

14 A We were having discussions about moving to United States  
02:14PM 15 or to Europe or within Italy. We didn't know where we wanted  
16 to stay.

17 Q Prior -- I just want to confirm. Prior to traveling to  
18 Kentucky to give birth, did you take any steps towards  
19 obtaining a status that would allow you to remain in the  
02:15PM 20 United States after your birth?

21 A No.

22 Q To your knowledge, did Mr. Nichols take any steps that  
23 would have allowed you to remain in the United States after  
24 Ethan was born?

02:15PM 25 A To my knowledge, no.

1 Q So what was your understanding of your trip to Kentucky?

2 A We were going to be -- okay. We flew the very last day  
3 that I could --

4 Q Ma'am, I will get to that part. Please answer my  
02:16PM 5 question.

6 What was your understanding of the extent of your  
7 trip to Kentucky?

8 A Just to give birth to our child.

9 Q Okay. Now, when did you travel to Kentucky?

02:16PM 10 A We flew from Naples, I think, to London on the 26th of  
11 January 2024. The next day we flew from London to Cincinnati,  
12 and we stayed until the 17th of March.

13 Q Okay. Who traveled to Kentucky with you in January?

14 A So it was me, Eric, and my children Ettore and Clelia.

02:16PM 15 Q And did Chiara -- did Chiara go?

16 A Yes, she joined us from the 1st to the 10th of March.

17 Q Was there any type of agreement with Ms. -- with  
18 Mr. Porzio, the children's father, Ettore and Clelia, was there  
19 any type of agreement that you could bring the children with  
02:17PM 20 you?

21 A Of course.

22 Q And what was the agreement?

23 A I asked him to sign a letter and -- consent letter where I  
24 told him where, when, and -- yeah, we would have been in  
02:17PM 25 America. Of course, I talked to him before to see if he agreed

1 to that.

2 Q And did he?

3 A Yes.

4 Q And did -- he provided you with some document to show

02:17PM 5 that you could take the children?

6 A Yes, he did.

7 Q Did you ever have any discussion with Mr. Porzio, the  
8 children's father, about you remaining in the United States  
9 with the children after Ethan's birth?

02:18PM 10 A So towards the end of our stay in America, I sent Luigi a  
11 message where I was telling him that we might have needed a few  
12 more days because we still didn't get the passport, Ethan's  
13 passport.

14 Q Okay. And --

02:18PM 15 MR. BERMAN: Objection. Hearsay. Move to strike  
16 that last part of that answer, Your Honor.

17 THE COURT: Overruled.

18 BY MR. QUINN:

19 Q And did Mr. Porzio agree for you to remain for an extra  
02:18PM 20 few days?

21 A Eventually for an extra few days, yes, he did.

22 Q And were those days necessary?

23 A No, luckily, they were not as necessary.

24 Q I'm going to ask my question again because that really  
02:19PM 25 wasn't what I was asking you.

1           The question was: Did you have a discussion with  
2 Mr. Porzio prior to going to the -- prior to going to the  
3 United States to give birth, did you have a discussion with him  
4 about you remaining in the United States following Ethan's  
02:19PM 5 birth?

6 A       No, absolutely not.

7 Q       Did you have a discussion with Mr. Porzio prior to going  
8 to the United States to ever move to the United States with the  
9 children?

02:19PM 10 A       No.

11 Q       Did you book the flights to Kentucky?

12 A       Eric did.

13 Q       And these flights, were they return flights?

14 A       Yes, they were.

02:20PM 15 Q       In Kentucky, did you book a hotel room?

16 A       We stayed at Eric's twin brother's place.

17 Q       What's his name?

18 A       Darren Nichols. For the first five weeks.

19 Q       How many weeks were you there total?

02:20PM 20 A       Six or seven.

21 Q       And you stayed in his brother's home for the first five  
22 months [sic]; correct?

23 A       Yes.

24 Q       And during this time -- strike that.

02:20PM 25           After the five weeks, where did you reside?

1 A We stayed in a hotel room for one night, and for the last  
2 days, in an Airbnb.

3 Q During your time in Kentucky, did you go and look at  
4 houses --

02:21PM 5 A No.

6 Q -- that were for sale?

7 A Never.

8 Q Did you look for any job?

9 A No.

02:21PM 10 Q To your knowledge, did Eric look for any houses?

11 A Not that I know.

12 Q To your knowledge, did he look for any jobs in the  
13 United States?

14 A No.

02:21PM 15 Q Did you rent a car in the United States?

16 A We did the last days.

17 Q What did you bring on your trip to Kentucky? What did  
18 you bring with you?

19 A Just some clothes.

02:21PM 20 Q How many suitcases did you have?

21 A One each.

22 Q Did you bring any -- strike that.

23 Mr. Nichols, did you notice how many suitcases he  
24 brought?

02:21PM 25 A He used one of my kids' suitcase to bring his books. So



1 we had one less -- I mean, our pieces of luggages [sic] were  
2 not one each, but one each minus one because one of these  
3 luggages was dedicated for the books that he needed for the  
4 English lessons.

02:22PM 5 Q So did Mr. Nichols continue working in Kentucky?

6 A Yes.

7 Q Via Zoom, is that it?

8 A Yes, remote.

9 Q Did --

02:22PM 10 THE COURT: Just a moment.

11 When you say he worked remote, was he tutoring  
12 English back in Italy?

13 THE WITNESS: Yes, exactly.

14 THE COURT: Just a moment.

02:22PM 15 Thank you, Counsel. Please continue.

16 MR. QUINN: Yes, Your Honor.

17 BY MR. QUINN:

18 Q Prior to leaving for Kentucky, did you make any  
19 arrangements regarding your home in Piano di Sorrento?

02:23PM 20 A I'm sorry, can you repeat the question?

21 Q Yes.

22 Prior to leaving Italy for Kentucky to give birth,  
23 did you make any kind of arrangements regarding your home in  
24 Piano di Sorrento?

02:23PM 25 A No.

1 Q Did you rent it out to anybody?

2 A No, certainly not.

3 Q Did you put it up for sale?

4 A No.

02:23PM 5 Q Did you transfer title to anyone?

6 A I'm sorry?

7 Q Did you give it to anybody?

8 A No.

9 Q Did you cancel your electrical service in Italy?

02:23PM 10 A Never.

11 Q What about the internet, did you cancel the internet?

12 A No, never. Nothing.

13 Q Did you cancel your cell phone service?

14 A No.

02:23PM 15 Q Did you cancel anything?

16 A No.

17 Q What about bank accounts, did you close any bank  
18 accounts?

19 A No.

02:23PM 20 Q Did you cancel any credit cards?

21 A No.

22 Q Did you tell anybody in Italy that you were moving to the  
23 United States?

24 A No.

02:24PM 25 Q Did you tell your family and friends when you were

1 returning?

2 A Yes, of course.

3 Q And you told them the date?

4 A Yes.

02:24PM 5 Q So was there any significance with the date you left for  
6 Kentucky?

7 A We --

8 Q Let me ask again.

9 The date you took off from Italy to go to Kentucky,  
02:24PM 10 was there any specific -- was there any significance to that  
11 date?

12 A Yes. It was -- yes. Sorry. It was the very last day  
13 that I could have flied with the pregnancy because you can fly  
14 until the -- four weeks before the due date.

02:25PM 15 Q What about the return date? You said you stayed there  
16 for close to seven weeks; right?

17 A Yes.

18 Q And you could have returned prior -- could you have  
19 returned prior to that date?

02:25PM 20 A We could have, but we decided to leave the next day after  
21 the -- Eric's birthday.

22 Q And Darren Nichols, Mr. Nichols' brother, are they twins?

23 A Yes, they are.

24 Q So it was after -- the day after Mr. Nichols' birthday  
02:25PM 25 also?

1 A Yes.

2 THE COURT: Just a minute. I missed that portion.  
3 You decided to leave, you said, one day after the birth of the  
4 baby?

02:26PM 5 THE WITNESS: No. We decided -- when we booked the  
6 flight, we decided to come back to Italy the day after Eric's,  
7 the father, and his twin brother's --

8 THE COURT: When you say "Eric," is that the --

9 THE WITNESS: Eric is the father.

02:26PM 10 THE COURT: The gentleman, Mr. Nichols?

11 THE WITNESS: Yes.

12 THE COURT: Oh. So you call him Eric.

13 Okay. Counsel, thank you.

14 MR. QUINN: Thank you, Your Honor.

02:26PM 15 THE COURT: Okay. And this was to be a booked  
16 flight when again? One day after --

17 THE WITNESS: Eric -- Mr. Nichols' birthday.

18 THE COURT: Okay.

19 THE WITNESS: Yes.

02:26PM 20 So we flew away from Cincinnati on the 17th of March  
21 2024.

22 THE COURT: Okay.

23 BY MR. QUINN:

24 Q While in the United States, did you open any bank  
02:27PM 25 accounts?

1 A No.

2 Q Did you apply for any credit cards?

3 A No.

4 Q Did you purchase a car?

02:27PM 5 A No.

6 Q Did you make any purchases while you were in the  
7 United States beyond the necessities of life, like your food  
8 and clothing, if necessary?

9 A No, nothing else.

02:27PM 10 Q Was there any discussion with Mr. Nichols prior to you  
11 giving birth that he would remain in the United States after --  
12 with Ethan after you gave birth?

13 A No.

14 Q You discussed -- you stated something regarding your  
02:27PM 15 concern about obtaining Ethan's passport.

16 A Yes.

17 Q Was there a problem in obtaining Ethan's passport?

18 A No. It wouldn't have been a problem, but we waited a long  
19 time until we finally got it.

02:28PM 20 Q What do you mean you "waited a long time"?

21 A So when Ethan was born, they told us in a few days, the  
22 birth certificate would have been ready. But I was not --

23 yeah, I was waiting for Eric to ask for the birth certificate  
24 so that we could have gone through the passport to issue, but

02:28PM 25 he never did until his twin brother called the hospital asking

1 if the birth certificate was ready.

2 Q So what date was Ethan born?

3 A Ethan was born the 13th of February.

4 Q He was born before the due date?

02:29PM 5 A Yes.

6 Q How long before his due date?

7 A 11 days. He was supposed to be born the 24th.

8 Q And you testified that the hospital indicated it would  
9 take a couple of days for the birth certificate; correct?

02:29PM 10 A A few days, maybe a week.

11 Q And when did you -- when did you finally obtain a birth  
12 certificate?

13 A Probably about ten days before we flew away.

14 Q And you flew away on which date again?

02:29PM 15 A 17th of March.

16 Q And you believe that you obtained a certificate  
17 approximately March 7th; is that it?

18 A I can't remember.

19 Q Was it in March?

02:30PM 20 A Yes.

21 Q So once you had the certificate and -- strike that.

22 Who obtained the certificate from the hospital?

23 A I think Eric did.

24 Q You don't know?

02:30PM 25 A I can't remember.

1 Q And once there was a certificate, what were the steps to  
2 obtain the passport for Ethan?

3 A We had to go to Chicago because we didn't have enough time  
4 for the normal procedure. So in Chicago, they could have gave  
02:30PM 5 us the passport in the same day.

6 Q Did you fly to Chicago?

7 A We drove.

8 Q Okay. And you went?

9 A It was the 13th of March when we got the passport.

02:30PM 10 Q And you flew out on the 17th?

11 A Yes.

12 Q Do you believe that Mr. Nichols delayed getting the  
13 passport?

14 A Yes.

02:31PM 15 Q Why do you believe that?

16 A Because he didn't want to come back to Italy. He told me  
17 he was concerned about his permit that expired.

18 Q What permit is that?

19 A The permit to stay in Italy.

02:31PM 20 Q Is that, like, a -- do you know what that is? Is it a  
21 visa? What is it?

22 A It's, like, a visa, yes.

23 Q And he told you it had expired?

24 A Yes. But I didn't know when.

02:31PM 25 Q So you returned to the United States. When you returned,

1 where -- did you go back living in your apartment?

2 A Yes.

3 Q And --

4 THE COURT: You said, "When you returned to the  
02:32PM 5 United States"?

6 MR. QUINN: I'm sorry. Yes, Your Honor. My  
7 apologies.

8 BY MR. QUINN:

9 Q When you returned to Italy from the United States, you  
02:32PM 10 returned to your apartment?

11 A Yes.

12 Q And did Mr. Nichols move in with you?

13 A No.

14 Q He maintained his own residence?

02:32PM 15 A Yes.

16 Q Did he stay at your house a lot?

17 A He spent the nights.

18 Q Every night?

19 A Almost every night.

02:32PM 20 Q Now, there was a lot of discussion after you returned  
21 to the -- Kentucky [sic]. There was a lot of discussions  
22 regarding moving to the United States; correct?

23 A Yes.

24 Q And Mr. Nichols was clear that he wanted to eventually  
02:32PM 25 come back to the United States with you and Ethan; correct?



1 MR. BERMAN: Objection. Leading.

2 MR. QUINN: I will rephrase, Your Honor.

3 THE COURT: Thank you.

4 BY MR. QUINN:

02:33PM 5 Q And what were Mr. -- what did Mr. Nichols tell you he  
6 wanted regarding the United States?

7 A He wanted to move to United States, but because I have  
8 other children, and I told him it would have been easier to  
9 move within Italy instead.

02:33PM 10 Q Did you tell Mr. Nichols, "I am never moving to the  
11 United States"?

12 A I didn't say that.

13 Q Did you intend on eventually moving to the United States?

14 A Eventually.

02:33PM 15 THE COURT: I'm sorry, say that again, please.

16 THE WITNESS: Eventually.

17 THE COURT: Okay.

18 BY MR. QUINN:

19 Q And what would need to happen in order for you to move to  
02:34PM 20 the United States? What were -- what changes in your life  
21 would need to happen?

22 A Okay. First of all, I should have get the divorce.

23 Q Okay. So are you still married to Mr. Porzio?

24 A Yes. We are separated.

02:34PM 25 Q Okay.

1 A And I wanted to keep -- my children to be older before  
2 moving.

3 Q Which children?

4 A Ettore and Clelia.

02:34PM 5 Q And how long did you want to remain in the -- in Italy --  
6 strike that.

7 How old did you want the children to be before you  
8 thought you could move?

9 A 14, 13 at least.

02:34PM 10 Q Okay. Did you relay this information to Mr. Nichols?

11 A Yes.

12 Q Did Mr. Nichols indicate to you that he understood that  
13 you had little children and it was difficult to move?

14 A He was pressing to move earlier. He said that he could  
02:35PM 15 have waited one, maximum two years.

16 Q And when -- these discussions regarding he could wait two  
17 years, approximately when did that happen?

18 A The last time, probably, was August or -- July or August  
19 2024.

02:35PM 20 THE COURT: So after you had returned --

21 THE WITNESS: Yes.

22 THE COURT: -- to Italy?

23 THE WITNESS: Yes. Thank you.

24 BY MR. QUINN:

02:35PM 25 Q Was there any --

1 MR. QUINN: May I inquire, Your Honor?

2 THE COURT: (No audible response.)

3 BY MR. QUINN:

4 Q When you returned to -- upon your return from Kentucky to  
02:36PM 5 Italy, let's say end of March, early April, did you make any  
6 plans to leave Italy?

7 A No.

8 Q Did you meet with an immigration attorney -- let me give  
9 you a specific timeline.

02:36PM 10 Between your return to the United States -- to  
11 Kentucky [sic] on -- did you arrive on March 18th? Is that  
12 correct?

13 A In Italy, yes.

14 Q So between your arrival in Italy on March 18th, 2024, and  
02:36PM 15 August 30th, 2024, when Mr. Nichols took Ethan, in that time  
16 period, did you meet with an immigration attorney?

17 A No.

18 Q Did you do any research to see how you could immigrate to  
19 the United States?

02:36PM 20 A No.

21 Q Did Mr. Nichols propose to you?

22 A He asked me many times.

23 Q He proposed to you?

24 A No, no, no. To get married? No.

02:37PM 25 Q I see.

1 Propose marriage to you?

2 A Yes. No.

3 Q Okay. To your knowledge, did he -- did he indicate to  
4 you that he had gone to see the immigration attorney regarding  
02:37PM 5 your status?

6 A I don't remember.

7 Q During the -- upon your return to the United States, do  
8 you know whether Mr. Nichols resumed work? Did he start  
9 working again?

02:37PM 10 A Yes.

11 Q And did he discuss his work with you?

12 A He said he was -- he wanted to take a break from the --  
13 from his job for being with Ethan for one or two years.

14 Q Did he take a break while you were -- in that time period  
02:37PM 15 from March until August?

16 A No. He worked until May or June, and then he was off for  
17 the summer.

18 Q I want to move forward to August 30th, 2024.

19 Well, actually, before we get there, you and  
02:38PM 20 Mr. Nichols, did your relationship end?

21 A Yes.

22 Q When did it end?

23 A August 5th.

24 Q And do you remember the cause of your relationship  
02:38PM 25 ending?

1 A Of course.

2 Q What caused your relationship to end?

3 A He didn't want to let me hold Ethan.

4 Q Well, tell -- what do you mean?

02:38PM 5 A So he took Ethan for a walk at 9:00 in the morning as he  
6 always -- as a routine, and at 11:30 I was with them because I  
7 knew that Ethan needed to be breastfed. So I did breastfeed  
8 Ethan. He fell asleep. That day was very, very hot, and he  
9 couldn't sleep well in the stroller because it was too hot, and  
02:39PM 10 after about 20 minutes, he woke up. Eric immediately took  
11 him in -- took Ethan in his arms and start walking around, and  
12 I was following them with the stroller.

13 Then I told him it was about time to go back home  
14 because I needed to prepare lunch. And he said, "Oh, no, Eric  
02:39PM 15 is -- Ethan is fine. I want to keep walking with him to  
16 Sorrento."

17 And it was, like, 12:30. It was so very hot that  
18 day, and I wasn't -- I didn't agree at all. I wanted to go  
19 back home with Ethan. And I tried to have Ethan in my arms.  
02:40PM 20 But Eric didn't let me, and he was walking away from me. And I  
21 started to get frustrated from this behavior. So, finally, I  
22 told him, "Okay. Let's go to the police, then."

23 And he walked with Ethan in his arms until the  
24 police station. Once we got there, I told the policeman that  
02:40PM 25 the father didn't want to let me hold our baby, and Eric

1 straightaway gave Ethan to me.

2 Q And that ended your relationship?

3 A Then we went back home as even the police were suggesting.

4 We went home and Eric came to the kitchen where I was and said,

02:41PM 5 "Oh, you know, I think our relationship is starting to have  
6 some problems."

7 I told him, "No, we have -- our relationship is  
8 over," and I asked for the keys of my apartment.

9 Q Did he give them to you?

02:41PM 10 A Yes. Not straightaway. I had to convince him.

11 Q Okay. And so from August 5th through August 30th, did  
12 Mr. Nichols have opportunities to see -- to spend time with  
13 Ethan?

14 A Every day.

02:41PM 15 Q Every day.

16 And what -- how much time did he get to see Ethan  
17 every day?

18 A We -- at the first -- at first, we decided from 9:00 to  
19 11:30 plus one extra hour in the evening. So it was twice a  
02:42PM 20 day.

21 THE COURT: And what were the hours again? I'm  
22 sorry.

23 THE WITNESS: From 9:00 to 11:30 --

24 THE COURT: Thank you.

02:42PM 25 THE WITNESS: -- and from 7:00 to 8:00 in the night.

1 But after sometime, I realized that the evening time  
2 was not good for Ethan because he needed to have the sleeping  
3 routine. He needed to be settled. So I told Eric that two  
4 hours in the morning were enough for him.

02:42PM 5 MR. QUINN: May I inquire, Your Honor?

6 THE COURT: (No audible response.)

7 BY MR. QUINN:

8 Q Were you breastfeeding at the time?

9 A Yes.

02:42PM 10 Q And what was Mr. Nichols' position on breastfeeding?

11 A From what he said, it was the Plan A. The Plan B was that  
12 he gave Ethan my breast milk with the bottle. The Plan C was  
13 giving Ethan formula.

14 Q And --

02:43PM 15 A And --

16 Q Go ahead.

17 A No. And I didn't agree, absolutely. I was already  
18 feeling weird to have to pump my milk for him to feed -- to  
19 feed Ethan because I didn't think it was necessary.

02:44PM 20 Q So when did you start pumping your milk?

21 A Eric asked me -- even before Ethan was born, he was  
22 telling me that he wanted to feed the baby. So at first, I  
23 said, "Okay. You will need to wait until the baby will start  
24 having food."

02:44PM 25 And he said, "Oh, no, I will have to -- I want to

1 feed the baby straightaway since he's born."

2 And so once a week -- he wanted to feed the baby at  
3 least once a week. And, again, it was so weird to me to hear  
4 those words.

02:44PM 5 Q Did you do this with your prior children?

6 A Never.

7 Q Were you breastfeeding your prior children?

8 A Absolutely, yes.

9 Q But did you comply with his request?

02:45PM 10 A Yes. Because, otherwise, he would have given Ethan  
11 formula, and I didn't want that.

12 Q When you returned from Italy, did Ethan have a  
13 pediatrician?

14 A Of course.

02:45PM 15 Q And how frequently did he go to the pediatrician upon  
16 your return?

17 A When needed. He had to have some vaccinations and also  
18 some grow visits. So at least -- he saw his pediatrician at  
19 least four or five times.

02:45PM 20 Q Did Eric go -- Mr. Nichols, did he go with you?

21 A Always.

22 Q Regarding -- you mentioned Plan C, the formula. From  
23 Ethan's birth through August 30th, did he ever have any  
24 formula, to your knowledge.

02:46PM 25 A From my knowledge, no.



1 Q You've never given him any formula?

2 A Absolutely not.

3 Q You didn't agree with formula?

4 A I didn't agree.

02:46PM 5 Q From August -- on August 6th, did Mr. Nichols see -- the  
6 day after you broke up, did Mr. Nichols see his child?

7 A Yes, he did.

8 Q Did he see him every day until August 30th?

9 A Yes.

02:46PM 10 Q At some point in August, you traveled to the south of  
11 France -- I'm sorry, "France" -- south of Italy?

12 A Yes.

13 Q What did you do there?

14 A I wanted to go to my brother and sister's place as I  
02:46PM 15 always do every summer.

16 Q When did you leave?

17 A We left the 23rd of July -- no, I'm sorry, of August 23rd.

18 Q And what was the planned return? When were you supposed  
19 to come back?

02:47PM 20 A At first, I was thinking to come back on the 28th. But  
21 then during the stay, I postponed to the 30th.

22 Q And you said that Mr. Nichols saw Ethan every day. So he  
23 traveled along with you?

24 A Yes.

02:47PM 25 Q What is the name of the town where you went?

1 A Torre Suda.

2 Q Could you spell that for the reporter?

3 A Yes. T-o-r-r-e. And then another word is S-u-d-a.

4 Q Who lives in Torre Suda?

02:47PM 5 A My sister, and my brother has the summer house there.

6 Q And were they both there when you visited?

7 A Yes.

8 Q And who did you stay with?

9 A We stayed -- well, it's a property where they have several  
02:48PM 10 houses, and we stayed all together.

11 Q Did you rent something?

12 A I didn't because I was with them.

13 Q But it wasn't at any of your family members' house; is  
14 that correct?

02:48PM 15 A Yes. My sister's and my brother's.

16 Q Oh, it's their home?

17 A Yes.

18 Q Okay. Where -- do you know where Mr. Nichols stayed?

19 A Yes. He was staying in an Airbnb in Mancaversa, not far  
02:48PM 20 from there -- from where I was.

21 Q Would you spell that for the Court?

22 A Mancaversa is a little village. It's M-a-n-c-a-v-e-r-s-a.

23 Q And how do you know he was staying in Mancaversa?

24 A He drove -- he rented a car and travelled the same day as  
02:49PM 25 we did, and then he was sending me the position. He sent me

1 the position of his place.

2 Q Of his location?

3 A Yes.

4 Q Every day Mr. -- while you were in the south of Italy,

02:49PM 5 every day Mr. Nichols would show up for his visit?

6 A Yes.

7 Q And every day would he return Ethan, not counting

8 August 30th?

9 A Yes.

02:49PM 10 THE COURT: So Ethan went to his Airbnb on occasion?  
11 When you say "returning Ethan," I don't understand what kind of  
12 physical custody he had at that time.

13 THE WITNESS: Okay. So Ethan was seeing his father  
14 for the morning times.

02:50PM 15 THE COURT: All right. Just a moment. So in other  
16 words, in the morning, maybe Ethan could see Mr. Nichols?

17 THE WITNESS: Yes.

18 THE COURT: Okay. Thank you.

19 Counsel.

02:50PM 20 MR. QUINN: Thank you, Your Honor.

21 BY MR. QUINN:

22 Q The -- are you aware of what Mr. Nichols did with Ethan  
23 during his parenting time?

24 A Sometimes he was telling me what they were doing.

02:50PM 25 Q And what are the kind of activities he did -- that he

1 told you he did?

2 A They went to the beach. One time they went to the water  
3 park. And that was it.

4 Q Now, was there an agreement between you and Mr. Nichols  
02:50PM 5 regarding Ethan's passport?

6 A Yes.

7 Q Who had possession of Ethan's American passport?

8 A Eric did.

9 Q Did you request to hold on to Mr. -- to Ethan's passport?

02:51PM 10 A Yes.

11 Q And what did Mr. Nichols tell you?

12 A He didn't want to because he said that it's -- that  
13 passport is his own. And I said, "It's Ethan's. It's not  
14 yours."

02:51PM 15 Q When you -- let me jump back a little bit.

16 When you came back from Kentucky to Italy, did you  
17 do something regarding Ethan's citizenship in Italy? Did you  
18 get a birth certificate?

19 A Once we went back to Italy, I did.

02:51PM 20 Q You obtained a birth certificate?

21 A Yes.

22 Q Did you obtain a -- any other documents regarding his  
23 stay -- his residency in Italy?

24 A Yes.

02:52PM 25 Q Like what?

1 A The identity card.

2 Q Do all Italian citizens have one of these?

3 A Yes.

4 Q Anything else?

02:52PM 5 A The *tessera sanitaria*.

6 Q Could you spell that for the Court?

7 A Yes. T-e-s-s-a-r-a [sic].

8 THE COURT: Would you spell that one more time? I'm  
9 sorry.

02:52PM 10 THE WITNESS: Of course. T-e-s-s-a-r-a, *tessera*;  
11 *sanitaria* is s-a-n-i-t-a-r-i-a.

12 THE COURT: And what is that?

13 THE WITNESS: It's a social security card, yeah.

14 BY MR. QUINN:

02:53PM 15 Q Ma'am, your agreement with Mr. Nichols regarding  
16 parenting time with Ethan, was that in writing?

17 A No.

18 Q So there -- but there was nothing -- nothing formal?

19 A No.

02:53PM 20 Q Did -- Mr. Nichols, to your knowledge, did he go to the  
21 Italian Family Court to get some kind of custody order?

22 A No.

23 Q Did you?

24 A No.

02:53PM 25 Q This was just an agreement you had with Mr. Nichols?

1 A Yes.

2 Q And coming back to the passport. So Mr. Nichols said he  
3 was holding on to the passport.

4 And how did that make you feel?

02:53PM 5 A I was very worried.

6 Q What were you worried about?

7 A I was asking for the passport because I knew that Eric  
8 wanted to go back to America, and I knew that he had the  
9 possibility to do that if he was holding the passport.

02:54PM 10 Q Did you bring these concerns to Mr. Nichols' attention?

11 A Yes.

12 Q And what did he respond?

13 A He didn't want to hear any -- he didn't want to talk about  
14 that. He was just -- he just wanted to hold the passport. So

02:54PM 15 the agreement that we finally decided is that every time he was  
16 having Ethan parenting time, then I would have kept the  
17 passport, just for that two hours.

18 Q And did Mr. Nichols respect that agreement?

19 A Almost all the time.

02:54PM 20 Q Prior to August 30th, was there any time where he didn't  
21 bring back the passport -- where he did not provide the  
22 passport in exchange for Ethan?

23 A No.

24 Q He always brought it?

02:55PM 25 A One time he didn't, and I told him, "I'm not giving Ethan

1 to you until you give me the passport."

2 Q What did he do?

3 A And so he went to pick it up. He said the passport was at  
4 his place. But probably --

02:55PM 5 Q So did he go pick it up or he did not?

6 A Yes.

7 Q And he returned for his visit?

8 A Yes.

9 Q On August 30th, Mr. Nichols showed up for his parenting  
02:55PM 10 time?

11 A Yes.

12 Q And did he have his -- Ethan's passport with him?

13 A Yes.

14 Q Did he show you?

02:55PM 15 A The passport? I didn't see the passport.

16 Q How do you know he had it?

17 A Because he didn't give it to me.

18 Q Okay. Did you ask for the passport that morning?

19 A I did.

02:55PM 20 Q And what did he say?

21 A He said, "I'm not giving it to you."

22 Q Did he tell you why?

23 A No.

24 Q And how did you respond?

02:56PM 25 A I was just -- as soon as he finished that sentence, he

1     drove away.    So I was just in panic.

2     Q     He already had Ethan in his custody before you found out  
3     he wasn't leaving the passport?

4     A     Yes.

02:56PM 5     Q     Is that how you usually did things regarding the  
6     passport?

7     A     Unfortunately, yes.

8     Q     So where was Ethan?

9     A     So that morning, Mr. Nichols came inside the property, as  
02:56PM 10    he usually waits outside.   But that morning he went inside and  
11   pick Ethan from my arms.   So he put Ethan in the car seat and  
12   while he was closing the seat belt, I walked around the car to  
13   wave to Ethan.   And so I saw him finishing there and quickly  
14   went -- Mr. Nichols went to sit at the driver's seat.   So I  
02:57PM 15   opened the door next to him, the passenger door, to ask for the  
16   passport, and that's what he said, that, "I'm not giving it to  
17   you."

18   Q     And what did you do after that?

19   A     He just drove away.

02:57PM 20   Q     What did you do?

21   A     I was in panic.   I was shocked.   And I was very afraid  
22   that he was going away.

23   Q     Okay.   Did you reach out to Mr. Nichols after he left?

24   A     Yes.

02:57PM 25   Q     How did you reach out to him?



1 A With WhatsApp messages and phone calls.

2 Q What did you say?

3 A I asked him where they were. And he sent me a position of  
4 a beach that was too far from -- it was even souther, and it  
02:58PM 5 was about 40 minutes away. So I thought it was weird to -- for  
6 them to be there.

7 Q Just so we have a frame of reference, from Piano di  
8 Sorrento where your home is to where your family is in the  
9 south where you were staying, how long of a drive is that?

02:58PM 10 A It's about a six-hour drive.

11 Q When you reached out to Mr. Nichols, did he tell you that  
12 he was leaving Italy at that time?

13 Let me rephrase that. Strike that.

14 How soon after Mr. Nichols was gone with Ethan did  
02:59PM 15 you reach out to him?

16 A Half an hour.

17 Q And did Mr. Nichols respond to you?

18 A Yes.

19 Q Did he tell you he was on his way out of the country?

02:59PM 20 A No.

21 Q Do you remember what he told you?

22 A He told me they were going to the beach.

23 Q Okay.

24 A And after that, he sent me a picture of Ethan sleeping in  
02:59PM 25 the car seat, and he said that he was waiting for him to wake

1 up because he wanted to take Ethan to the water park again.

2 And I constantly was saying, "No, he needs to come  
3 back."

4 And after, again, he told me, "Oh, I saw that on the  
02:59PM 5 way back, there is a zoo. I really want to take Ethan to the  
6 zoo."

7 I said, "Absolutely not. He needs to come back. I  
8 need to breastfeed."

9 Q Do you remember, approximately, what time that was?

03:00PM 10 A Probably it was around 12:00 or 1:00 p.m.

11 Q What time did Mr. Nichols pick up Ethan?

12 A 8:00 o'clock in the morning.

13 Q When was he supposed to return him?

14 A 10:00.

03:00PM 15 Q And now it was past noon?

16 A Yes.

17 Q What happened next?

18 A Around 2:00 o'clock, I went to the police station to  
19 report Mr. Nichols --

03:00PM 20 Q Okay.

21 A -- because he didn't return the child.

22 Q And what did you do after that?

23 A After that, we -- we drove to Piano di Sorrento.

24 Q Why did you drive back home?

03:00PM 25 A Because that day we had planned to go back, and Eric was

1 telling me that he was taking Ethan to Sorrento.

2 Q Okay. So Mr. Nichols told you that he was driving back  
3 to Sorrento; correct?

4 A Yes.

03:01PM 5 Q Sorrento is next to Piano di Sorrento?

6 A Yes.

7 Q And did he tell you to meet him there? Did you tell him  
8 you would meet him there? How did it work out?

9 A He said that, "You took Ethan there; I take him back."

03:01PM 10 Q So you drove back to Piano di Sorrento?

11 A Yes.

12 Q You said it was a six-hour drive?

13 A Yes.

14 Q Who was in the car with you?

03:01PM 15 A Chiara, Ettore, and Clelia.

16 Q Do you remember what time you left the south to get back  
17 to Piano?

18 A It was about 4:00 in the afternoon.

19 Q And what time did you get to Piano?

03:01PM 20 A Around 9:30.

21 Q When you arrived at Piano, was Mr. Nichols there?

22 A No.

23 Q Did Mr. -- did you advise Mr. Nichols that you had  
24 arrived at Piano?

03:02PM 25 A Yes.

1 Q And what was his response to you?

2 A His response was that he was -- at the meeting, that he  
3 was taking Ethan to America.

4 Q Did he tell you whether he was at an airport? In a  
03:02PM 5 plane? What did he tell you?

6 A He said they were about to leave for United States.

7 MR. QUINN: I ask the Court to mark for  
8 identification Petitioner's Exhibit 17. Exhibit 17 are the  
9 WhatsApp messages between Mr. Nichols and petitioner and --  
03:02PM 10 from Friday, August 30th, through the following Sunday.

11 MR. BERMAN: Your Honor, I object to this exhibit as  
12 we have not received this before today's proceeding, Number 17.

13 THE COURT: Counsel, have they received this before  
14 today?

03:03PM 15 MR. QUINN: Absolutely. They requested it in  
16 discovery and we produced it.

17 MR. BERMAN: I've never made a discovery request. I  
18 have not received this.

19 MR. QUINN: Yes, they did make a discovery request,  
03:03PM 20 and we produced them. They asked at her deposition for these  
21 communications, and we produced them. They're all in an email,  
22 and I produced them.

23 So it might not have been a formal request, but it  
24 was a request at Ms. Ciampa's deposition, and we produced  
03:03PM 25 these. We produced them on Tuesday morning.

1 THE COURT: Tuesday morning? What date?

2 MR. QUINN: 28th, I believe. January 28th was  
3 Tuesday.

4 THE COURT: How did you produce them?

03:04PM 5 MR. QUINN: I produced them via email, Your Honor --

6 THE COURT: Via email?

7 MR. QUINN: -- along with all the other documents  
8 they requested.

9 THE COURT: Do you have a copy of that email?

03:04PM 10 MR. QUINN: I do.

11 THE COURT: Okay. Get it. You can put that up on  
12 the ELMO.

13 Karlen, would you help counsel?

14 MR. BERMAN: I'm going to withdraw the objection. I  
03:05PM 15 apologize, Your Honor. We did receive an email --

16 THE COURT: Counsel, sit down. That's the second  
17 time. What's going on? You're either ill-prepared or you're  
18 obfuscating. What's occurring here?

19 MR. BERMAN: I'm not obfuscating, Your Honor.

03:05PM 20 THE COURT: Then what's happening here? I warned  
21 you once. This is the second time.

22 MR. BERMAN: It won't happen again, Your Honor.

23 THE COURT: No, it won't happen again. Am I clear?

24 All right. We'll take a recess for 20 minutes.

03:05PM 25 Thank you.

1 MR. QUINN: Thank you, Your Honor.

2 THE COURT: You may step down. Step down please.

3 **(Recess from 3:05 p.m. to 3:39 p.m.)**

4 THE COURT: Now, first, we're on the record. Let me  
03:39PM 5 apologize, Counsel, to you on the defense side for a moment.

6 When Courts are wrong, we should apologize to counsel. Isn't

7 that refreshing? And I think that I was intemperate, and I

8 want to tell you that you're probably very well prepared. And

9 I don't believe you're obfuscating. But please be careful.

03:39PM 10 It's getting burdensome to go through a process where you

11 believe you haven't received something, and you have; okay?

12 Fair enough?

13 MR. BERMAN: Thank you, Your Honor.

14 THE COURT: But I owe you an apology for that, and I  
03:39PM 15 want to say that on the record.

16 MR. BERMAN: Thank you, Your Honor.

17 THE COURT: Okay.

18 Counsel.

19 MR. QUINN: Thank you, Your Honor.

03:39PM 20 Your Honor, if I may?

21 THE COURT: Please.

22 MR. QUINN: Was Number 17 marked for identification?

23 THE COURT: Marked for identification.

24 MR. QUINN: Thank you, Your Honor.

03:40PM 25 BY MR. QUINN:

1 Q Claudia, can you take a look at the Exhibit 17?

2 A Yes.

3 Q Okay. Have you seen this exhibit before?

4 A Yes.

03:40PM 5 Q Now, these WhatsApp messages, you provided those to me;  
6 correct?

7 A Yes.

8 Q And it was in response --

9 THE COURT: Just a moment. I don't know how to get  
03:40PM 10 realtime up, and I apologize.

11 Karlen, somebody, help me.

12 **(Pause in proceedings.)**

13 BY MR. QUINN:

14 Q You provided those to me in response to the request by  
03:41PM 15 Mr. Nichols' counsel; correct?

16 A Yes.

17 Q Are you very familiar with these text messages?

18 A Of course.

19 Q Exhibit 17, is that an accurate representation of the  
03:41PM 20 text -- the WhatsApp messages between you and Mr. Nichols  
21 beginning on August 30th, 2024, and ending on September 9th,  
22 2024?

23 A Yes, it's a complete conversation between us.

24 Q Okay.

03:41PM 25 MR. QUINN: Your Honor, I would ask that Exhibit 17

1 be moved into the record.

2 THE COURT: Received.

3 MR. QUINN: Thank you, Your Honor.

4 **(Exhibit Number 17 received.)**

03:41PM 5 MR. BERMAN: Your Honor, I would just object to the  
6 portions that are in Italian --

7 THE COURT: All right. Thank you, Counsel. They're  
8 received.

9 BY MR. QUINN:

03:41PM 10 Q Ma'am, I would ask you to take a look at page 8 of  
11 Exhibit 17.

12 A Yes.

13 Q There's a -- there's three paragraphs at the bottom of  
14 the page and they're in Italian. Can you read those to  
03:41PM 15 yourself, please?

16 A Yes. (Witness complies.)

17 Okay.

18 Q And these three paragraphs, were they -- is that the --  
19 Mr. Nichols' side of the conversation?

03:42PM 20 A Yes.

21 Q And presumably, they were sent by him?

22 A Yes.

23 Q And can you tell the Court -- just summarize to the  
24 Court, what do these three paragraphs say?

03:42PM 25 MR. BERMAN: Objection. Lack of foundation,



1 improper translation.

2 THE COURT: Overruled.

3 BY MR. QUINN:

4 Q You can tell the Court.

03:42PM 5 THE COURT: You can tell the Court.

6 THE WITNESS: Okay. It says:

7 "I would have never wrote this message, but I  
8 have to think of Ethan. I'm flying to England and  
9 then United States. I will stay there with Ethan.

03:42PM 10 I left Italy because I was really afraid for  
11 the" -- (speaking in Italian) -- "safety and the  
12 well-being of Ethan with you. Claudia, really, I  
13 have no intention of keeping Ethan away from you."

14 BY MR. QUINN:

03:43PM 15 Q These text messages arrived, according to this, at 9:32,  
16 9:44, and 9:52; correct?

17 A Correct.

18 Q And where were you when you received these WhatsApp  
19 messages?

03:43PM 20 A I just arrived in Piano di Sorrento.

21 Q And did you -- did you advise Mr. Nichols that you had  
22 arrived at Piano di Sorrento?

23 A Yes. At --

24 Q That's okay. I'll ask you more questions. Don't worry.

03:43PM 25 Did -- was this the first time you learned that day

1 that he -- that Mr. Nichols had left the country?

2 A Yes.

3 Q I have a really quick question. You mentioned that your  
4 mom lives next door to you.

03:43PM 5 A Yes.

6 Q Is your mother involved in Ethan's life?

7 A Of course. She's very close to him.

8 Q How often did your mom see Ethan when you were living in  
9 Piano di Sorrento?

03:44PM 10 A Every day.

11 Q So you testified prior to the break that you went to see  
12 the police; correct?

13 A Yes.

14 Q And you made a police report?

03:44PM 15 A I did.

16 Q And you -- did you provide that police report to the  
17 authority -- to the -- no, strike that.

18 THE COURT: Just one moment.

19 Karlen, could I see you for a minute.

03:44PM 20 **(The Court and clerk conferred off the record.)**

21 THE COURT: Counsel, I'm sorry. Thank you.

22 MR. QUINN: Thank you, Your Honor.

23 BY MR. QUINN:

24 Q In addition to the police -- strike that.

03:45PM 25 Did you ask Mr. Nichols to come back?

1 A Yes. Many times.

2 Q And he refused?

3 A Yes, he refused or didn't answer.

4 Q In those -- in those -- that initial day, after you

03:45PM 5 received notification that he was leaving, did he tell you

6 where in the United States he was going?

7 A Never.

8 Q Just to get a frame -- a time frame, eventually you did

9 regain your son; correct?

03:45PM 10 A I'm sorry?

11 Q At some point you got custody of Ethan back?

12 A On the 30th?

13 Q No, no, in the future.

14 A Okay.

03:45PM 15 Q Eventually -- when did you see -- again, my fault. It's

16 my -- I'm not asking the right question.

17 Mr. Nichols left on August 30th?

18 A Yes.

19 Q When was the last time you held -- when was the next time

03:46PM 20 you held your son?

21 A November 20th, late night.

22 Q 2024?

23 A Yes.

24 THE COURT: November what, 20th?

03:46PM 25 THE WITNESS: Yes.

1 THE COURT: All right. Thank you.

2 THE WITNESS: Thank you, Your Honor.

3 BY MR. QUINN:

4 Q So we're going to focus on that time period.

03:46PM 5 So from August 30th through November 20th, did you  
6 repeatedly ask Mr. Nichols where your son was?

7 A Yes.

8 Q Did he ever tell you?

9 A No.

03:46PM 10 Q At some point you filed a Hague application?

11 A Yes.

12 Q Where did you file this application?

13 A To Rome. I was in Rome at my lawyer's office.

14 Q In Rome?

03:46PM 15 A Yes.

16 Q And at anytime during this period -- two-and-a-half-month  
17 period; right? It's a little bit more than two and a half  
18 months?

19 A Yes, a little.

03:47PM 20 Q Did Mr. Nichols tell you that his lawyer told him that  
21 you couldn't -- that he couldn't tell you where he was?

22 A Sometimes.

23 Q He did?

24 A Yes.

03:47PM 25 Q Did you offer to Mr. Nichols to just simply come back?

1 A Yes. Many times.

2 Q And what was his response?

3 A No response.

4 Q In that two-and-a-half-month period, were you served with  
03:47PM 5 any type of custody petition by Mr. Nichols or his lawyers?

6 A No.

7 Q Were you served with some kind of domestic violence  
8 restraining order by Mr. Nichols --

9 A Never.

03:47PM 10 Q -- or his lawyers?

11 A No.

12 Q In the time that you were living with Mr. Nichols --  
13 strike that.

14 In the time prior to Mr. Nichols leaving on  
03:48PM 15 August 30th, did he ever seek a restraining order against you?

16 A No.

17 Q Did he ever -- to your knowledge, did he ever go to court  
18 to seek custody of Ethan?

19 A No, never.

03:48PM 20 Q Did he ever call the police and attempt to have you  
21 arrested?

22 A No.

23 Q To your knowledge, did he ever go to the police and tell  
24 the police that you were a danger to Ethan?

03:48PM 25 A No.

1 Q In the United States, we have Child Protective Services.

2 Do you have something like that in Italy?

3 A Yes.

4 Q To your knowledge, was any complaint made against you

03:48PM 5 regarding the health and safety of Ethan?

6 A No.

7 Q Did the State ever go to your house in Italy?

8 A Never.

9 Q When you arrived in the United States and you

03:49PM 10 retrieved -- oh, first of all, let's back up.

11 How did you find out that they had found Ethan?

12 A The consulate called me and also advised that an email has

13 been sent to me, that the district attorney was telling me that

14 they found Ethan and that he was in their custody until I would

03:49PM 15 have been -- I would have come to United States to get him.

16 And we had the first hearing on the 18th of November.

17 Q Okay. So once you found out that they had found

18 Mr. Nichols, what did you do?

19 A I had the hearing, and then I had to find --

03:49PM 20 Q Prior to that. You were still in Italy. When you first

21 found out --

22 A Yes.

23 Q -- that Mr. Nichols was found, what did you do?

24 A So I received the phone call from the consulate. I read

03:50PM 25 the email. I had the first hearing online --

1 Q Okay.

2 A -- from Italy. And in the meantime, I was looking for  
3 flights, and I got to come here on the 20th.

4 Q Mr. Nichols filed two declaration with this Court, and in  
03:50PM 5 his declaration, he makes certain statements about you, and I  
6 would like to ask you about those.

7 MR. QUINN: I would ask the Court to mark for  
8 identification Petitioner's Exhibit 3, which is Mr. Nichols'  
9 declaration --

03:51PM 10 THE COURT: That's received, Counsel.

11 MR. QUINN: Thank you.

12 **(Exhibit Number 3 received.)**

13 BY MR. QUINN:

14 Q Could you turn to page 11, please.

03:51PM 15 A Yes.

16 Q I would like you to take a look at the last paragraph.  
17 Just read it to yourself so we're on the same page.

18 A Okay. (Witness complies.)

19 Q So Mr. Nichols says that between the -- claims that  
03:51PM 20 between the period of July 14 [sic], 2019, and November 2023,  
21 that you demonstrated severe depression. Were you suffering  
22 from depression during this time period?

23 A Absolutely not.

24 Q Did you -- he claims that you had severe anger issues.  
03:51PM 25 Did you have severe anger issues?

1 A Absolutely not.

2 Q He says that during this period of July 4th, 2019,  
3 through November 2023, that you had suicidal thoughts?

4 A No.

03:52PM 5 Q So just so we're clear, November '23 is the November  
6 prior to the birth of your son; correct?

7 A Correct.

8 Q At no point -- your testimony, at no point during this  
9 time period did you have any type of suicidal thoughts; is that  
03:52PM 10 correct?

11 A That's correct.

12 Q He claims that he spoke to your sister, your brother,  
13 sister-in-law. Have any of these people come to you indicating  
14 that they're worried about your mental health?

03:52PM 15 A Never.

16 Q Ask you to turn to the next page, please.

17 Mr. -- here, Mr. Nichols discusses a July 4th, 2019,  
18 Facebook message where he claims that you said, "If I'll still  
19 be alive" when he asked you when he could see you.

03:53PM 20 Do you recall that?

21 A Actually, no, but it could be that I was just joking. I  
22 mean...

23 Q In July of 2019, do you remember being -- having suicidal  
24 thoughts?

03:53PM 25 A No, absolutely not.



1 Q He claims that on February 24th, 2024 --

2 Remind us, when was Ethan born?

3 A The 13th.

4 Q So 11 days after he was born, he claims that when he  
03:53PM 5 asked you if he could take Ethan on a walk, that you sat up and  
6 threw Ethan at him saying, "Here, you can -- you take care of  
7 the effing kid."

8 Did that happen?

9 A No.

03:54PM 10 Q Have you ever thrown Ethan --

11 A No.

12 Q -- at him --

13 A Of course not.

14 Q -- or at anyone?

03:54PM 15 A Anyone, no.

16 Q Did you ever say those words?

17 A No.

18 Q He claims that in -- from February 2024 through August  
19 2024, you would frequently cry for extended periods of time; is  
03:54PM 20 that true?

21 A No.

22 Q Would you cry -- do you remember crying during that time  
23 period?

24 A It could have happened.

03:54PM 25 Q Okay. And this is shortly after Ethan was born?

1 A Yes.

2 Q What would make you cry?

3 A I was overwhelmed.

4 Q What do you mean you were overwhelmed?

03:54PM 5 A Eric was stressing me out a lot.

6 Q How was he stressing you out?

7 A He was constantly watching me. He was complaining about

8 me sleeping with Ethan, breastfeeding too many times. He was

9 complaining about many things. And I also had issues with my

03:55PM 10 ex-husband. So I was very overwhelmed.

11 Q You said Mr. Nichols complained about you breastfeeding

12 too much?

13 A Yes.

14 Q Can you tell us more about that?

03:55PM 15 A I remember one time he asked the pediatrician in Piano di

16 Sorrento, "How many times should she -- should Claudia

17 breastfeed Ethan?"

18 And, of course, breastfeeding doesn't have any

19 timing, at least from what I've learned from the WHO. So it's

03:55PM 20 on request. And I always did -- also with my other children, I

21 always gave my breast milk anytime I wanted or they wanted.

22 Q And his comments regarding breastfeeding, though,

23 stressed you out?

24 A Yes.

03:56PM 25 Q Anything else that would stress you out that he would do?

1 A I didn't feel supported. And I felt like we were in  
2 conflict instead of being a team.

3 Q He claimed that you turned down his offer to take you to  
4 medical health treatment. Do you remember him offering to take  
03:56PM 5 you to medical health treatment?

6 A Yes, I do.

7 Q Okay. Can you tell us about that?

8 A I just remember sometimes he was accusing me to not being  
9 well, but I felt fine. It was just his impression.

03:57PM 10 Q In Italy, did you have a therapist?

11 A I have my doctor, yes.

12 Q What kind of doctor?

13 A The basic -- the normal doctor --

14 Q Just a general doctor?

03:57PM 15 A Yeah, general doctor.

16 THE COURT: But the question was: Did you have a  
17 therapist as well, a psychologist or a psychiatrist?

18 THE WITNESS: I've been -- I've been having sessions  
19 with a therapist.

03:57PM 20 THE COURT: And when did those start?

21 THE WITNESS: I'm sorry?

22 THE COURT: When did those start?

23 THE WITNESS: I had several times during my life --

24 THE COURT: Okay.

03:57PM 25 THE WITNESS: -- I wanted to have support from a

1 therapist.

2 THE COURT: Okay.

3 THE WITNESS: For example, when I broke up with my  
4 ex-husband, I've been followed by a therapist for a few  
03:57PM 5 sessions.

6 THE COURT: Okay. Thank you.

7 THE WITNESS: You're welcome.

8 BY MR. QUINN:

9 Q So when you feel you need it, you go see a therapist?

03:58PM 10 A Of course.

11 Q I would like you to read to yourself paragraphs 61 and 62  
12 so I can ask you questions about it.

13 A (Witness complies.)

14 I read it.

03:58PM 15 Q Now, one of Mr. Nichols' most damning allegations is that  
16 on May 29, 2024, at approximately 9:30 p.m., he came to your  
17 home, and he believes that you were attempting to commit  
18 suicide and also murder your three children, Ethan, Ettore, and  
19 Clelia?

03:59PM 20 A That's ridiculous.

21 Q Okay. Do you remember that incident?

22 A Yes, I do.

23 Q Can you tell the Court what happened on that evening?

24 A Okay. What happened is that I was waiting for Eric to  
03:59PM 25 come back home for having dinner, and so I left a pot full of

1 water on the fire.

2 Q Why?

3 A For making dinner to him. But he arrived very late, and I  
4 believe it was later than 9:30. I don't remember exactly when,  
03:59PM 5 but I think it was much later. And so when he arrived, I fell  
6 asleep, but the pot was on the fire.

7 Q You fell asleep before he arrived?

8 A Before he arrived. When he arrived, I woke up.

9 Q And he claims that in addition to the burner that was on  
04:00PM 10 for the water, there was another burner that was on but not on  
11 fire, so the gas was coming out.

12 Do you agree that that was happening also?

13 A It's not possible.

14 Q Why not?

04:00PM 15 A First of all, because there's security. So even if the  
16 *manopola*, the handle, is on, it doesn't come out -- the gas  
17 won't come out. Plus there was the fire on. So if there was  
18 gas in the room, everything would have been burned.

19 Q Okay. At that time, did Mr. Nichols tell you anything  
04:00PM 20 about him thinking this was a suicide attempt?

21 A No.

22 Q Did he tell you anything, such as, "Are you trying to  
23 kill the kids?"

24 A No.

04:01PM 25 Q Did he tell you -- what did he say about, like -- strike

1 that.

2 He walks in, he woke you up, you said; right?

3 A Yes.

4 Q Do you remember if he said anything to you regarding  
04:01PM 5 this?

6 A Yes. He was upset. He was worried. He said, "Oh, you  
7 were asleep -- you're sleeping and the fire is on."

8 Q Have you frequently left the burners on in your home?

9 A No.

04:01PM 10 Q That evening, ma'am, were you trying to commit suicide?

11 A Absolutely not.

12 Q Were you trying to kill your children?

13 A Oh, no, of course not.

14 Q He claims that a few days after -- Mr. Nichols claims a  
04:01PM 15 few days after, that he bluntly asked you if it was a suicide  
16 attempt, and you said, "Don't worry about it."

17 A I don't remember.

18 Q And he then says when he pushed you on it, you responded,  
19 "You'll know."

04:02PM 20 Does that ring a bell?

21 A I actually don't remember.

22 Q Do you remember a conversation about the -- do you  
23 remember a conversation occurring after -- days after this  
24 incident regarding --

04:02PM 25 A No, I don't.

1 Q He then goes on, on the next page, to state that he,  
2 "asked you if you had thought about how you would commit  
3 suicide."

4 Did Mr. Nichols ever ask you that?

04:02PM 5 A Yes.

6 Q And what did you respond to him?

7 A That I never thought of committing suicide.

8 Q He claims that you responded, "When something bad  
9 happens, you'll know it's your fault."

04:03PM 10 Did you ever say that to him?

11 A Yes, I did.

12 Q Why did you say that to him?

13 A Because I was overwhelmed. And I did think of suicide,  
14 but it was just a very simple thought. I mean, I was not  
04:03PM 15 actually thinking, "Oh, how can I suicide?"

16 Q So let's talk about that. So you had -- let's give it a  
17 time frame. Was this after Ethan was born?

18 A Yes.

19 Q And do you remember, approximately, when you had this  
04:03PM 20 thought?

21 A Probably April.

22 Q Is this something that you thought about regularly?

23 A No.

24 Q How many times did you think about suicide?

04:03PM 25 A Once.

1 Q One time.

2 And was anything happening on that specific day that  
3 would have made you think about suicide?

4 A Again, I was overwhelmed and, again, Eric was stressing me  
04:04PM 5 out a lot, especially since Ethan was born.

6 Q Okay. Did you give any thought of how you would commit  
7 suicide?

8 A No.

9 Q Did you do any type of online research to see how you  
04:04PM 10 could commit suicide?

11 A Absolutely not.

12 Q Did you think to yourself, "I need to go see a  
13 therapist"?

14 A I was fine.

04:04PM 15 Q You were fine?

16 A Yeah.

17 Q How long would you say -- this moment of thinking about  
18 suicide, how long did that last?

19 A Just one day.

04:04PM 20 Q Just one day.

21 And did you share it with Mr. Nichols?

22 A I did share this thought a few months later.

23 Q And what did you tell Mr. Nichols about this?

24 A I just told him that a few months before, I thought of  
04:05PM 25 suicide because I was overwhelmed.



1 Q How did he respond?

2 A He was excited to hear that.

3 Q Well, what do you mean he was excited?

4 A I saw his lighting up when I -- like he was -- he wanted  
04:05PM 5 to hear that. That's what -- that's my feeling.

6 MR. BERMAN: Objection. Lacks foundation. Move to  
7 strike that answer.

8 THE COURT: This is just her perception, Counsel.  
9 I'll take it as that.

04:05PM 10 MR. BERMAN: Thank you, Your Honor.

11 BY MR. QUINN:

12 Q He states that a few days later he wrote back to you  
13 through WhatsApp and he brought this up again.

14 Do you remember a conversation where he brought it  
04:05PM 15 up again?

16 A Yes.

17 Q And he advised you that he was scared when you told him  
18 that?

19 A Yes.

04:06PM 20 Q What did you respond?

21 A That I was sorry.

22 Q What were you sorry about?

23 A That he got scared.

24 Q Did -- to your knowledge, did he go see the police  
04:06PM 25 regarding this?

1 A No.

2 Q After the text message -- the WhatsApp message where he  
3 brings it up on July 22nd, did he ever bring it up again?

4 A No.

04:06PM 5 Q Did he try to get you into some kind of psychiatric  
6 treatment?

7 A No.

8 Q He claims that you were "acting very erratic on  
9 August 5th."

04:07PM 10 Now, we talked about August 5th. August 5th is the  
11 day you broke up; correct?

12 A Yes, correct.

13 Q He says you were "very erratic and dangerous that day."

14 Do you recall that day?

04:07PM 15 A I recall that day.

16 Q Do you believe that you were acting in an erratic manner?

17 A No.

18 Q What about a dangerous manner?

19 A Absolutely not.

04:07PM 20 Q Did you go with Mr. Nichols -- did you go on his daily --  
21 strike that.

22 When Mr. Nichols had his parenting time, did you  
23 insist on going along with him?

24 A Sometimes. But why not?

04:07PM 25 Q Okay. Oh, that's fine.

1 A Yeah.

2 Q And let me be more clear. After you broke up on  
3 August 5th, did you insist on going with him --

4 A No.

04:07PM 5 Q -- during this parenting time?

6 A No.

7 Q So you let him do his own thing with the baby?

8 A Absolutely.

9 Q Prior to August 5th, you were still in a relationship  
04:08PM 10 with Mr. Nichols?

11 A Correct.

12 Q And you sometimes would go with him?

13 A Sure.

14 Q Mr. Nichols speaks about you "swatting the phone" he was  
04:08PM 15 holding on that date.

16 A Yes.

17 Q Do you remember that?

18 A I remember.

19 Q So walk us through that episode, the episode where --  
04:08PM 20 now, first of all, did you swat the phone in his hand?

21 A I pushed his hand with the phone because I didn't want him  
22 to record me.

23 Q Okay. So let's back up a little bit.

24 Tell us the context of how it ended that way.

04:08PM 25 A Yes. As I said before, he didn't want to let me hold

1 Ethan, and he was walking away. So then he stopped, and he  
2 started to record my frustration, because, of course, I was  
3 upset and worried because that behavior -- I think his behavior  
4 was erratic instead, not mine. And so I pushed his hand  
04:09PM 5 because I didn't want him to record me. But at the same time I  
6 thought, why is he recording me? He is the one who's not  
7 giving me the baby.

8 Q And you wanted the baby because of what?

9 A Because I wanted to take him back home because it was too  
04:09PM 10 very hot.

11 Q Do you remember what time it was?

12 A It was about 12:30.

13 Q After lunch?

14 A Yes, around lunchtime.

04:09PM 15 Q On August 11 -- if you'll turn to page 14. In his  
16 declaration on August 11, Mr. Nichols claims that on that date,  
17 you started swinging Ethan from side to side in a violent and  
18 erratic manner while singing:

19 "I'm happy. Look, I'm happy. I have a smile  
04:10PM 20 on my face. Just like the birds and the  
21 butterflies, I have a smile that God gave me."

22 Do you remember this incident on August 11th?

23 A I remember August 11th.

24 Q What happened -- did it happen the way he claims?

04:10PM 25 A Absolutely not.

1 Q What happened on August 11th?

2 A On August 11th, we arrived in Verona, and I was very  
3 tired, but I couldn't rest in the afternoon because the  
4 air-conditioning, he was -- it was too cold for me, and I  
04:11PM 5 couldn't rest. I was very tired, the night. And we were  
6 supposed to go to a show, but we couldn't get in because Ethan  
7 is too young. So I wanted to go back to the room because I was  
8 very tired and wanted to rest.

9 So we went back -- I went back with Ethan and after  
04:11PM 10 a little bit, he arrived too. He took the remote of the  
11 air-conditioning, and I stepped outside of the room because I  
12 didn't want to freeze again. So I asked him to leave the  
13 remote controller of the air-conditioning to me so that I could  
14 have managed the temperature so that I could rest. And so I  
04:12PM 15 was waiting for him to give me the remote outside of the room.  
16 He was just looking at me and said, "Are you okay? Are you  
17 okay?"

18 I said, "Yes, I'm okay. I'm okay."

19 And then suddenly he left with the remote controller  
04:12PM 20 and came back after a little bit with the *équipe* of an  
21 ambulance, with doctors.

22 Q Sorry, the what?

23 A With doctors of an ambulance. He arrived with the *équipe*  
24 of doctors.

04:12PM 25 Q Oh, a team?

1 A A team, yeah. Okay.

2 THE COURT: Nicholas [sic] arrived with doctors?

3 THE WITNESS: Yes.

4 THE COURT: Okay.

04:12PM 5 BY MR. QUINN:

6 Q So you were in Verona?

7 A Yes.

8 Q And Mr. Nichols was there too?

9 A Yes.

04:12PM 10 Q So he walked in the room and he had a team of doctors?

11 A Yes.

12 Q What happened?

13 A The doctors visited me. I told them that we had

14 discussions. We were arguing. They find my blood pressure

04:13PM 15 very, very high. And they checked the pressure twice. Then I

16 asked to let Eric go outside of the room, and they checked the

17 blood pressure again. It was a little bit better. But they

18 wrote that I was -- I was -- (speaking in Italian) -- I was

19 fine, because he told them that I was -- that I had problems,

04:14PM 20 mental problems, but, of course, they didn't find any. I was

21 fine.

22 Q Okay. Mr. Nichols claims in his declaration there were

23 paramedics, and perhaps it's a language thing. Were they just

24 men with an ambulance or did they tell you they were actually

04:14PM 25 doctors?

1 A Doctors.

2 Q They were doctors.

3 A At least one was a doctor.

4 Q Okay. And there were also police officers?

04:14PM 5 A I saw a police officer.

6 Q Okay.

7 A But it just -- he just checked in the room and left.

8 Q Did that -- was this in the evening -- yes, right.

9 A Yes.

04:14PM 10 Q Did anybody -- were you arrested?

11 A No.

12 Q Were you taken to the hospital?

13 A No.

14 Q Was Ethan taken from you?

04:14PM 15 A No.

16 Q What did -- they just left?

17 A They just left because I was fine, apart from the blood  
18 pressure.

19 Q Do you suffer -- to your knowledge, do you suffer from  
04:15PM 20 high blood pressure?

21 A I don't.

22 Q He then said in his declaration that on August 18th, you  
23 fled with Ethan to Torre Suda, despite his objection.

24 Did you flee, run away, from Piano di Sorrento to go  
04:15PM 25 to Torre Suda?

1 A Never.

2 Q Prior to going to Torre Suda, did you tell Mr. Nichols  
3 that you were going to Torre Suda?

4 A Of course. And it was the 23rd.

04:15PM 5 Q You told him on the 23rd?

6 A No, no, I told him before.

7 Q Okay. You left on the 23rd?

8 A Yes.

9 Q Okay. Did Mr. Nichols tell you that he did not agree for  
04:15PM 10 you to go to Torre Suda?

11 A I don't remember.

12 Q And you testified earlier that he actually went with you;  
13 right?

14 A Yes.

04:16PM 15 Q To be clear, when I say "went with you," was he in the  
16 car with you?

17 A No.

18 Q Did he drive along with you or did he arrive at a  
19 different time?

04:16PM 20 A He was following us.

21 Q The whole way?

22 A Yes.

23 Q Mr. Nichols then says that on November 17th, 2024 --  
24 that's the day before he is caught; right?

04:16PM 25 A Yeah.



1 Q That you acknowledged your anger -- acknowledging that  
2 you had now had your anger under control.

3 Do you remember that?

4 A Yes.

04:17PM 5 Q What did you mean when you said that you had -- first of  
6 all, did you say you had your anger under control?

7 A Yes, I did.

8 Q What anger were you talking about?

9 A The anger he caused me taking Ethan away from me.

04:17PM 10 Q When he took Ethan away from you, were you still  
11 breastfeeding?

12 A Yes, I was.

13 Q How did it make you feel when he took Ethan away?

14 A It was unbelievable. I couldn't believe it. It was  
04:17PM 15 horrible. In the first weeks, I couldn't sleep, I couldn't  
16 eat, I had palpitations, I had tachycardia. The whole family  
17 was devastated.

18 Q And did you convey to Mr. Nichols what he was doing to  
19 you?

04:18PM 20 A I'm sorry?

21 Q Did you tell Mr. Nichols what this was doing to you?

22 A Yes.

23 Q And he still never told you -- right? --

24 A Right.

04:18PM 25 Q -- where he was?

1 A No.

2 Q He also claims that you kicked him in bed a few times.

3 Do you remember doing that?

4 A I don't remember doing that.

04:18PM 5 Q Apart from the time you pushed his hand away with the  
6 phone --

7 A Uh-huh.

8 Q -- did you ever hit Mr. Nichols?

9 A No.

04:18PM 10 Q Punch him?

11 A I'm sorry?

12 Q Did you ever punch him?

13 A No.

14 Q Slap him?

04:18PM 15 A No.

16 Q Kick him?

17 A No.

18 Q Did you ever -- did you ever hit Ethan?

19 A Absolutely not.

04:19PM 20 Q Did you ever hit any of your children?

21 A No.

22 Q What happened as a result of -- you said you were  
23 breastfeeding. What happened as a result of Ethan leaving?

24 A I waited for a few days, as much as I could, hoping that  
04:19PM 25 they would have come back, but I had to undergo a therapy to

1 stop the milk.

2 Q Oh, so medication?

3 A Yes.

4 Q And were you able to resume breastfeeding once you had

04:19PM 5 Ethan in November?

6 A Of course not.

7 Q How long did you breastfeed your other children?

8 A An average of two and a half years.

9 Q And were you planning on doing the same here?

04:20PM 10 A Yes.

11 Q How would you describe your relationship with -- well,

12 let's start with Chiara. Chiara was 19?

13 A Yes.

14 Q How was your relationship with Chiara?

04:20PM 15 A It's a very good relationship. We are almost friends.

16 Q And what about your relationship with Ettore and

17 Clelia -- and I know I'm massacring those names, but how is

18 your relationship with those children?

19 A It's very good relationship with all my children.

04:20PM 20 Q And have you ever been accused by anyone of abusing

21 any -- not just Ethan, but any of your other children?

22 A Never.

23 MR. QUINN: May I have ten seconds, Your Honor?

24 THE COURT: You may.

04:21PM 25 **(Counsel conferred off the record.)**

1 MR. QUINN: Your Honor, I am done. Thank you.

2 THE COURT: All right. Now, Counsel, let me bear  
3 with you. These folks have come a long ways on both sides. I  
4 don't mind continuing after hours if you're comfortable with  
04:21PM 5 it. So I'd like to hear cross-examination, if possible,  
6 tonight.

7 Would that be acceptable?

8 MR. BERMAN: Yes, Your Honor.

9 THE COURT: All right. Why don't we take just a  
04:21PM 10 five-minute break. We'll set up CourtSmart and then let me see  
11 if I can accommodate you tonight; okay?

12 Thank you very much.

13 **(Further proceedings reported by**

14 **CourtSmart in Volume II.)**

15 **(Proceedings conclude at 4:21 p.m.)**

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CERTIFICATE OF OFFICIAL REPORTER

COUNTY OF LOS ANGELES )  
 )  
STATE OF CALIFORNIA )

I, DEBBIE HINO-SPAAN, FEDERAL OFFICIAL REALTIME COURT REPORTER, in and for the United States District Court for the Central District of California, do hereby certify that pursuant to Section 753, Title 28, United States Code that the foregoing is a true and correct transcript of the stenographically reported proceedings held in the above-entitled matter and that the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

Date: February 13, 2025

/S/ *DEBBIE HINO-SPAAN*

Debbie Hino-Spaan, CSR No. 7953  
Federal Official Court Reporter