

**MICHIGAN STATE UNIVERSITY COLLEGE OF LAW  
ADVOCACY  
SPRING PROBLEM 2024  
JOINT APPENDIX**

**This document contains all the facts students enrolled in Advocacy for the Spring Semester of 2024 at Michigan State University College of Law will use for the entire semester for the appellate briefs they will write and the oral arguments they will present.**

**These facts are contained in what is called a Joint Appendix, prepared in compliance with Federal Rule of Appellate Procedure 30. The Joint Appendix (to the parties' briefs) contains all the documents the two parties agree are relevant to the appeal. Once the parties have filed this Joint Appendix, agreeing that these documents contain the facts the appellate court should consider on appeal, the parties cannot use any facts in their briefs or oral arguments outside of those contained in the Joint Appendix.**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

AUDREY ADAMS

Plaintiff,

vs.

COLUMBIA EXAMINER,  
A Delaware corporation, and  
JESSIE TAYLOR, an individual,

Civil Action No. 23-1488  
HON. Evelyn King

Defendants.

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**ORDER GRANTING DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Audrey Adams brought this defamation action against Defendant Columbia Examiner and Defendant Jessie Taylor for the allegedly defamatory statements contained in an article written by Jessie Taylor and published in the Thursday, September 14, 2023, print and online editions of the Columbia Examiner.

Defendants conceded that the statements in that article regarding Plaintiff's role in the death of Daniella Plaza were eventually discovered to have been false. However, Defendants filed a Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, asking that this Court hold that the First Amendment shields them from liability under the doctrine set forth in *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964). This Court agrees that the First Amendment

protects Defendants.

Under *New York Times* and its progeny, a public figure can prevail on a defamation claim only by proving that the defendant(s) published the defamatory statement(s) with “actual malice.” The first issue before the court, then, is whether Plaintiff was a public figure. Defendants conceded that Plaintiff lacked the kind of fame that would make her a public figure for all purposes. Defendants instead argued that Plaintiff was a limited purpose public figure under *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974).

Under this Circuit’s three-element test, a plaintiff was a limited purpose public figure if there was a public controversy, the plaintiff played a sufficient role in that controversy, and the allegedly defamatory statements were germane to that controversy.

The parties have stipulated on the first element that there was a public controversy and have defined the public controversy as follows: “There was a public controversy over the senator’s fitness for office; when a young woman died at a social gathering at the senator’s house, the cause of death became a sub-controversy of the larger controversy over the senator’s fitness for office. The sub-controversy over the cause of death preceded the article which Plaintiff claims was defamatory.” Additionally, the parties have stipulated on the third element that the allegedly defamatory statements were germane to the controversy over the cause of the death of the young woman at the social gathering at the senator’s house.

The parties argued on the issue of whether Plaintiff played a sufficient role in the controversy. Defendants argued that Plaintiff was an involuntary limited purpose public figure, and, alternatively, that she was a voluntary limited purpose public figure because she thrust herself into the controversy or assumed the risk that she would be inserted into the controversy when she tried to use the senator’s controversial reputation for her own gain.

This court holds that the involuntary limited purpose public figure theory in *Dameron v. Washington Magazine, Inc.*, 779 F.2d 736 (2d Cir. 1985), is no longer valid in this circuit. This court finds, however, that Plaintiff assumed the risk that she would become embroiled in the public controversy under *Clyburn v. News World Communications, Inc.*, 903 F.2d 29 (D.C. Cir. 1990), and, therefore, was a public figure for the limited purpose of the sub-controversy over the young woman's cause of death.

Because Plaintiff was a limited purpose public figure for the purpose of the September 14, 2023, article in the Columbia Examiner, she can prevail on her defamation claim only if she can prove with clear and convincing evidence that Defendants published the article with actual malice.

Based on the facts developed through discovery, this Court finds no reasonable jury could so conclude. Defendants' pre-publishing investigation was reasonable. Finally, the record could not support a finding that Defendants' article was an irrational interpretation of the sources on which it was based under *Time, Inc. v. Pape*, 401 U.S. 279 (1971).

Therefore, this court grants Defendants' motion for summary judgment.

#### ORDER

The Court orders that Plaintiff's Complaint be dismissed with prejudice.

Dated: December 12, 2023

*Evelyn King*

The Honorable Evelyn King  
United States District Court for  
the District of Columbia

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

AUDREY ADAMS

Plaintiff,

Court of Appeals: 23-7046  
District Court: 23-1488

vs.

COLUMBIA EXAMINER,  
A Delaware corporation, and  
JESSIE TAYLOR, an individual,

Defendants.

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**NOTICE OF APPEAL**

Notice is hereby given that Plaintiff Audrey Adams appeals to the United States Court of Appeals for the District of Columbia from the Order Granting Defendants' Motion for Summary Judgment entered in this action on December 12, 2023.

Dated: December 13, 2023

By: Emily Michaels

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
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AUDREY ADAMS

Plaintiff,

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DEPOSITION OF Audrey Adams, a party in the above-entitled action, taken at the request of the Defendants, pursuant to the Federal Rules of Civil Procedure before Magnus Clark, a certified court stenographer and Notary Public in and for the District of Columbia. The deposition took place at the law offices of Michaels & Carter, PLLC, 827 Walter Way St., Washington D.C., 20006 on the 31<sup>st</sup> day of October 2023, at 10:00 a.m. It was stipulated by and between counsel for the parties that the requirements of notice of taking of the deposition have been complied with, that proof of the qualification of the Notary Public before whom the deposition is taken has been waived, and that the reading and signing of the deposition have been waived.

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1 Present: Plaintiff Audrey Adams, Plaintiff's attorney Emily Michaels, Defendants' attorney  
2 Charlie Hess, and court reporter Magnus Clark.  
3  
4 Q: (DEFENDANTS' ATTORNEY CHARLIE HESS) For the record, would you please state  
5 your name?  
6  
7 A: (PLAINTIFF AUDREY ADAMS) My name is Audrey Adams.  
8  
9 Q: Ms. Adams, may I call you Audrey?  
10  
11 A: Yes.  
12  
13 Q: Audrey, do you understand that this is a deposition and that I am going to be asking you some  
14 questions today?  
15  
16 A: Yes.  
17  
18 Q: Audrey, if you don't understand a question that I ask, please stop me and ask me to explain it  
19 to you. If you don't tell me immediately after I ask a question that you don't understand it, I will  
20 assume that you understand the question and have answered it accordingly. Do you understand  
21 what I mean?  
22  
23 A: Yes, I do.  
24  
25 Q: And finally, please answer every question verbally. In conversation, we tend to answer  
26 questions with "uh-huh" or nod our head, but, since the court reporter must accurately record the  
27 conversation, she is not able to record that response properly. So, try your best to answer every  
28 question verbally. If you do not, and I remind you, please know that I am not trying to be rude. I  
29 am trying to maintain a clear record. Does that make sense?  
30  
31 A: Uh-huh. Oh, I mean yes. I'm sorry. I already started it off that way.  
32  
33 Q: No, no, you're fine. But now that you know, let's begin. Audrey, what is your address?  
34  
35 A: 201 Cobblestone Road, Germantown, Maryland.  
36  
37 Q: Audrey, did you take an oath administered by the court reporter?  
38  
39 A: Yes, I did. I swore to tell the truth.  
40  
41 Q: Thanks. Audrey, when were you born?  
42  
43 A: January 26, 1999.  
44  
45 Q: So, you are how old?  
46

1 A: Twenty-four years old.  
2  
3 Q: Audrey, are you currently taking any drugs or medications for any reason at all?  
4  
5 A: I occasionally take aspirin and Motrin for headaches and cramps, but I take no prescription  
6 drugs. I take antibiotics if I have a specific illness.  
7  
8 Q: Have you taken any drugs or medication within the last forty-eight hours?  
9  
10 A: No.  
11  
12 Q: Are you currently employed?  
13  
14 A: No.  
15  
16 Q: How do you spend your time?  
17  
18 A: Well, right now I'm in school for a master's in business. I just started in September of 2022. I  
19 plan to graduate from the University of Maryland with my MBA in 2024. I'm studying quite a  
20 bit. I'm also very active in my local gym. I go almost every day for one to two hours a day. I also  
21 do, or I guess, did, make Instagram posts and TikTok videos in my spare time. I hang out with  
22 my friends, too.  
23  
24 Q: What's the name of your gym?  
25  
26 A: Germantown Training.  
27  
28 Q: Okay. And when are you expected to graduate with your master's?  
29  
30 A: In June of 2024. It's a two-year program.  
31  
32 Q: Okay. And you said you hang out with your friends. What is it that you and your friends like  
33 to do together?  
34  
35 A: We'll go out to dinner, go see movies, those kinds of things. Sometimes we'll just hang out at  
36 my house and make a charcuterie board and watch a movie. Occasionally, we'll go out to a bar  
37 or two. They go more often than I do to the bars. I prefer to stay in and get some sleep, since I  
38 usually go to the gym early in the morning.  
39  
40 Q: Okay. And can you tell me about your Instagram and TikTok accounts?  
41  
42 A: Sure. What would you like to know about them?  
43  
44 Q: Well, when did you first make them?  
45  
46 A: I've had Instagram for a long time. I think I made my account my freshman year of high



1 school, which I think was in 2012 or 2013. TikTok, I didn't download and make an account until  
2 the pandemic in 2020. That's sort of when TikTok really took off, I think. Maybe it was before  
3 then, but that's when I downloaded it. All my roommates at the time who I was quarantined with  
4 had it downloaded and would show me videos. They told me I was missing out, so I downloaded  
5 it, too.

6  
7 Q: Okay, let's start with Instagram. What kinds of things did you post on Instagram when you  
8 had it in high school?

9  
10 A: Oh, my, well it's sort of embarrassing to think of now. I don't even think I have most of those  
11 photos on my account anymore. It was a lot of selfies. So just pictures of myself when I turned  
12 my phone around and took a picture of my face. Lots of duck-lips. I'd also take those with my  
13 friends or post photos of my friends being silly. It was all innocent high-schooler stuff.

14  
15 Q: Okay, makes sense. Did that change at all as you've gotten older?

16  
17 A: Do you mean did I get more mature? Yes. Now I post stuff with my friends, working out,  
18 stuff about school. I typically think before I post, too. I used to be more careless and post too  
19 much personal stuff that could give away where I live or other information about me that I just  
20 don't want random strangers to know. So, now I post a lot about the gym and exercise because  
21 it's such a big part of my life. A lot of the stuff about the gym is on my Instagram stories.

22  
23 Q: What is an Instagram story?

24  
25 A: It's a lot like Snapchat stories. I think Instagram basically copied it. It's just something you  
26 post to your profile, but it disappears after twenty-four hours. If you log onto Instagram,  
27 everyone you follow will have their stories, if they have one up, at the top of your home page.  
28 You can save your own stories to your profile if you want them to stay there permanently, but  
29 you don't have to. So, basically, it's like a disappearing post. I don't know why, but it's a thing.

30  
31 Q: How many followers do you have on Instagram?

32  
33 A: Right now, around three thousand, I think. But I had a little over five thousand prior to the  
34 article.

35  
36 Q: So, I'm assuming you did not know most of your followers?

37  
38 A: Yes, that's true. A lot of them followed me for my posts about fitness. I would share the  
39 workouts I was doing. I would show the different exercises I did at the gym for targeting  
40 different areas of the body. People seemed to like those. They could follow my routine at their  
41 local gym.

42  
43 Q: Okay, that makes sense. Now, let's move to TikTok. What kinds of things do you post on  
44 TikTok?

45  
46 A: More or less the same thing. Workout videos. Some food recipes as well. I'm no chef, but I

1 do like to find recipes online and try them out, especially healthy ones. It fits with my theme on  
2 social media. I was like a fitness, health, and wellness person. It's a thing right now on social  
3 media. I'm not sure how healthy it is, the constant comparison, but a lot of girls are doing it  
4 nowadays.

5  
6 Q: A lot of girls are doing what nowadays?  
7

8 A: A lot of girls are posting about how they exercise, what they eat, and what they do to stay  
9 healthy.

10  
11 Q: So when you say you don't know how healthy it is, what do you mean?  
12

13 A: There are usually images included. Since the photographs these girls post always show them  
14 as thin and beautiful, the posts could encourage unhealthy comparisons.

15  
16 Q: Alright, thank you for explaining. How many followers do you have on TikTok?  
17

18 A: I had about 5,000 followers on TikTok. The number has dropped by about 2,000 since the  
19 article that made my greens sound dangerous. I did have one post get like 7,000 thousand views  
20 after the article, I think because people heard my name and wanted to see if I was going to  
21 address the fact that it seemed people thought I might be a murderer. But that only lasted for one  
22 TikTok. Then my engagement dropped significantly.

23  
24 Q: Wow, 7,000 views. Is that a lot for TikTok?  
25

26 A: Honestly, it depends on who you're asking. Views just means people have seen it, not that  
27 they've "liked" it. TikTok is different from Instagram in the way that people who don't follow  
28 your account might still see your post on their regular home feed. It's based off of some  
29 algorithm, which goes off of what videos you typically watch, and that's what TikTok will show  
30 you more of. I don't really know how it works. I've had four TikTok posts that each had 1,000  
31 likes, actually. Those each had like ten thousand views. But, like I was saying, there really is no  
32 rhyme or reason to it that I know of. Sometimes I see the most stupid videos, and they get like  
33 100,000 views and like 50,000 likes. One time my friend posted a video of a group of our friends  
34 doing a silly dance, and it got 20,000 views and around 10,000 likes, which is a lot more than my  
35 four posts at 1,000 likes each.

36  
37 Q: Okay. Can you tell me about this business you were trying to build?  
38

39 A: Yes. I wanted to make my own brand of supplement powder that I could, hopefully, sell to  
40 stores eventually.

41  
42 Q: Can you describe this supplement powder for me?  
43

44 A: Sure. So, my supplement powder was going to be, like, a vegetable supplement. They're  
45 typically called greens. Girls will post all the time about drinking greens, typically before they go  
46 to the gym. People use it as a pre-workout, but it's mainly just a vegetable supplement if you

1 don't eat enough vegetables. It comes in powder form, like protein powder, that you can mix in  
2 water. Some people mix it into a smoothie. Green drinks to women are like what protein powder  
3 is to men. Men and women alike will drink both or neither, but greens seem to be marketed more  
4 toward women. My goal was to eventually market it toward men, too, because everyone can use  
5 some extra vitamins. I wanted it to be useful for anyone.

6  
7 Q: Were you able to make your powder?

8  
9 A: Yes, I was able to make some.

10  
11 Q: And how were you able to do that? I mean, these things are made in a lab or at a  
12 manufacturing plant, right?

13  
14 A: Yes, usually they're made somewhere like that. I had reached out to a few manufacturers, but  
15 at that time no one was really interested until I had some evidence that this could be a successful  
16 business. I didn't have enough money or clout to get me the leverage I needed with those places.  
17 So, I was able to buy the powders individually, which included barley grass, spirulina powder,  
18 wheatgrass powder, alfalfa powder, and a few other things like that. I mixed them together with  
19 natural flavor powder. For example, for the party I used strawberry flavor. On Etsy, where  
20 people sell their crafts, I found a girl who had a shop that made packaging for products like mine.  
21 I had the girl with the Etsy shop make and mail me the packaging I needed.

22  
23 Q: How did you figure out what to put in your greens?

24  
25 A: A lot of it was looking at other products online. The other part was trial and error. Once I got  
26 it to a point where I thought it tasted good, I noticed it helped with my bloating. I ran it by my  
27 friend in college who is getting her master's degree in nutrition to make sure it was safe. Then, I  
28 started handing them out at the gym.

29  
30 Q: Are the powders you just listed along with the natural flavor powder a full list of ingredients?

31  
32 A: No. Let me see. Plus chlorella, matcha, cordyceps mushroom, and lion's mane mushroom. All  
33 in powder form.

34  
35 Q: At the point when you started handing your greens out at the gym, did you charge anything?

36  
37 A: No. I was just giving them out. I wanted people to try it and give me feedback on how it  
38 tasted and whether they thought it was helpful. It's hard to tell if greens provide extra energy and  
39 reduce bloat because they mostly just give you extra vegetables. But I looked flatter from the  
40 side when I drank it. I felt better able to attack my workout, lighter, and just overall healthier. It  
41 might have been in my head, but I wanted to see what others thought.

42  
43 Q: Did the people at the gym like your supplement?

44  
45 A: They loved it! I was feeling great about the whole thing. I started posting about it on my  
46 Instagram and TikTok accounts.

1 Q: What were you posting about them? Was it an advertisement?  
2  
3 A: I was getting the word out in preparation for selling them. My posts weren't really  
4 advertisements because it wasn't like order them at the link yet. There was nowhere to buy it at  
5 this point. I was just saying, in conjunction with my workout posts, I created these greens. I was  
6 taking videos of people drinking it, doing a cheer of the drinks, those sorts of things.  
7  
8 Q: Did you name the supplement powder?  
9  
10 A: Yes. Before I posted on social media, I decided to call it Blossom Powder.  
11  
12 Q: How did you fall on that name?  
13  
14 A: I thought it was feminine. Many supplement powders you find at the store or protein powders  
15 are marketed toward men. I wanted to make this one different.  
16  
17 Q: When you say different, I'm a little confused. Aren't these greens, these vegetable powder  
18 supplements, pretty popular already?  
19  
20 A: Yes, that's true. There are greens on the market that are campaigned for women. I figured,  
21 since I have somewhat of a social media following, why can't I create and sell one, too?  
22 Anyhow, I chose the name because I thought it was feminine.  
23  
24 Q: Okay. Thank you for the background information on your drink. Now, let's move to the party.  
25 How did you find yourself going to the party?  
26  
27 A: Okay. So, my friend Rylee McGee is a congressional intern on Capitol Hill. She works for  
28 Senator Stone's chief of staff right now. I guess Senator Stone told his chief of staff he was  
29 having another party and needed his assistance in throwing it the right way. By that, I think he  
30 meant he needed help with optics. So, Rylee's boss asked her to handle some of the minor  
31 catering stuff, while he dealt with the rest. He handled hiring the main caterer but asked Rylee to  
32 fill any holes, like if they needed an alternative for health or allergy reasons. Rylee asked if I  
33 wanted to serve my greens at the party near the end of the night. Fits with the goal of the night,  
34 to not be so, I guess, scandalous?  
35  
36 Q: So, Rylee just asked if you wanted to? Do you know why she would have thought of you?  
37  
38 A: Well, me and Rylee have been friends for a long time. I think part of it was I just had a little  
39 bit of a breakup not too long before this party. And I was still pretty bummed. And I was trying  
40 to start up this greens thing. People in the gym liked it, and Rylee had tried it a few times. She  
41 even shared her drinking it to her Instagram to try to get more people to see it. So, when she was  
42 given the chance, she thought she would ask me. Her chief of staff doesn't pay much attention.  
43 He just trusts her. He probably didn't even notice I was there.  
44  
45 Q: Okay. So, she asked you to bring your drinks to the party. How did you respond?  
46

1 A: Well, obviously, I was elated, so I said yes. What an opportunity. A bunch of people would be  
2 there. Although people in government and politics aren't really the group I was marketing  
3 towards, I thought other people might be there, too. Senator Stone has a son about my age. I  
4 checked him out on social media. He is into fitness.

5  
6 Q: Did you get paid to hand out your supplement at this party?

7  
8 A: No, it was like a favor to me to let me do it.

9  
10 Q: Were you formally contracted by anyone to serve at the party?

11  
12 A: No, not at all.

13  
14 Q: Where was the party held?

15  
16 A: At Senator Stone's home.

17  
18 Q: Did you know that would be the location when you agreed to come to the party and pass out  
19 your supplement?

20  
21 A: Yes.

22  
23 Q: Had you ever been to Senator Stone's home before this September 8 party?

24  
25 A: No, I had not.

26  
27 Q: Okay. When you accepted the opportunity to distribute your supplement at Senator Stone's  
28 party, did you think anyone else famous might be there?

29  
30 A: I hoped so, but I didn't know. I hoped it was going to help jump-start my greens business.  
31 Instead, it ended what was about to be a profitable business.

32  
33 Q: Why do you think your little greens project was about to become a real and a profitable  
34 business?

35  
36 A: With people like models at the party pictured with it and me, it was about to take off. For  
37 sure. All that came to a very quick end.

38  
39 Q: What if the greens market was already saturated or was just over?

40  
41 A: If I had enough time to establish myself after the party and the photographs that got posted  
42 from it, I hoped I would be able to pivot to the next big thing in the fitness and wellness market.  
43 But that market is closed to me now.

44  
45 Q: Back to the night of September 8, how did you prepare for the party?

46

1 A: First, I made sure my drink mixes were perfect, and I packaged them up nicely. My packaging  
2 that I had so far looks similar to like Emergen-C packets or Liquid IV. Like I mentioned, I  
3 bought them from a lady on Etsy who could personalize them for me. And I made sure it had on  
4 it the information that other packages like that had. Although I wasn't completely within the  
5 industry yet, I wanted to label to the extent I knew how before going to a manufacturer. Then I  
6 bought a dress. Rylee told me she would handle the rest.

7  
8 Q: What time did you get to the party?

9  
10 A: I got there earlier and prepared in the basement, but I appeared to hand out my supplement at  
11 10:30, which is late for me. I'm not really a party person anymore.

12  
13 Q: Why so late?

14  
15 A: Well, I was more of the party favors girl. I was offering the drinks and packets towards the  
16 end of the night after people had been drinking, since this was, like, the healthy thing. It has so  
17 many nutrients in it, and you mix it with water so that it helps with hydration.

18  
19 Q: So, how did you mix those drinks that very night? Did you pre-mix them? Did you mix them  
20 in front of people or just give them a packet?

21  
22 A: So, the powder I had pre-mixed at home. At the party, I opened packets, poured them into  
23 cocktail glasses, and mixed them to demonstrate. Then, I placed the drinks on a tray. I also put  
24 packets into little clear baggies tied with green ribbon people could take home with them.

25  
26 Q: Do you know who Daniella Plaza is?

27  
28 A: Yes, of course. She's a model. Everyone follows her. Plus, I've seen her on the D.C. fashion  
29 pages, like for WTOP News.

30  
31 Q: How did Daniella Plaza get her drink that night?

32  
33 A: She came up to my tray and took one. She said it was delicious and took another. Then she  
34 took a bag with packets and asked if she could have more. I gave her like ten more packets. I was  
35 thrilled. I think she drank at least three more of the glasses that I mixed at the party.

36  
37 Q: Did you see the senator's son Matt that night?

38  
39 A: I saw who I thought was him from his social media pics near Daniella. I think he took a sip of  
40 my greens, winced, and handed it to one of the caterers who was clearing glasses and plates.

41  
42 Q: Do you know at about what time you saw Matt and Daniella?

43  
44 A: I think, at that point, it was around 11:15 at night. People had started to leave. I left at 11:30.

45  
46 Q: You said earlier you are not much of a party person anymore. What did you mean by that?

1 A: I used to party a bit in undergrad at UCLA. I never did drugs, but I would go to parties, hit the  
2 frat scene, and drink a little excessively on the weekends. I was still a really good student, but I  
3 just went a little too hard on the weekends. I grew out of it pretty fast, though, especially after  
4 COVID. I hate to admit it, but it also got less fun to drink once I was of the legal age.  
5

6 Q: Back to the party. Let's re-visit preparing the packets for the party. Are you one hundred  
7 percent confident that the only thing you put in those packets was the powder you created with  
8 the mix of the ingredients you mentioned earlier?  
9

10 A: Yes.  
11

12 Q: How can you be so sure there was no contamination since you were mixing all those powders  
13 together at home?  
14

15 A: The healthy powder ingredients were the only thing that went into those packages. The  
16 packaging arrived three days before the party. I packaged them up the night before, using a  
17 funnel. I wore gloves and a mask over my mouth and nose. I even wore goggles. My kitchen was  
18 spotless. There was no contamination.  
19

20 Q: Do you have any history of illicit drug use?  
21

22 A: I already told you, I drank in undergrad, but I have never used drugs.  
23

24 Q: Do you have any roommates?  
25

26 A: No. I live alone.  
27

28 Q: You said before you do not work. How do you pay your rent and other expenses?  
29

30 A: My parents pay all that because I am in grad school.  
31

32 Q: Alright. The night before the party, was anyone helping you mix and package?  
33

34 A: No.  
35

36 Q: Does anyone you associate with have a history of illicit drug use?  
37

38 A: My ex-boyfriend tried cocaine a few times that I know of. That's part of the reason I broke up  
39 with him. Like I said, although I partied, I didn't like hard drugs. And once I grew out of  
40 partying, I didn't want to be worried about where he was partying all the time. We just had  
41 different lifestyles. There were also some concerns about infidelity.  
42

43 Q: Is it your testimony that, although your boyfriend used cocaine, you never tried it, not even  
44 once?  
45

46 A: That is correct. I have never once used cocaine.

1 Q: What about your friends? Do they do drugs? Cocaine maybe?  
2  
3 A: I don't think my friends do drugs. Not around me. I don't know everything they do when I'm  
4 not around, obviously, depending on what friends you're asking about. I'm not on that level with  
5 all of them to be like, hey, do you do drugs? The ones I do know well, I know don't do drugs. I  
6 know Rylee does not have any history of drug use. Her, I'm close with.  
7  
8 Q: Did your friends know your ex-boyfriend?  
9  
10 A: Sure. We dated for like over a year.  
11  
12 Q: Did they know about his cocaine use?  
13  
14 A: Probably. Rylee and I talked about it.  
15  
16 Q: Okay. So, is it your position that there is no way any sort of drug could have gotten into your  
17 drink?  
18  
19 A: There was no way it could have gotten into the powder I mixed together and packaged the  
20 night before. There is no way something else got into them when I mixed the powder with water  
21 at the party and placed the drinks on a tray. If something got into the drinks, it was after I had  
22 made the drink, handed it out, and no longer had any control over it. But we all know that, right?  
23 We all know it wasn't contamination, and I did not put anything into anyone's drink. I don't  
24 understand why you're asking me this.  
25  
26 Q: I think the point is that, with you mixing powder at home, don't you agree it is logical to  
27 suspect contamination?  
28  
29 A: No. I don't.  
30  
31 Q: Let's talk about your social media posts from the night of the party at Senator Stone's house.  
32 Can you turn to Exhibit 1, please, and read that to me?  
33  
34 A: This was my post the night of the party at about 9:30 p.m., right after I had gotten ready. It's  
35 a photo Rylee took. I captioned it: Don't go home alone tonight, Senator! Take one of my green  
36 drinks with you! #combatbloat #curethathangover #greensupplementpowder #greens  
37 #blossompowder.  
38  
39 Q: Can you describe what you're doing in the photograph? Or is that a video?  
40  
41 A: It's a photo. I was just holding a tray of the green drinks already mixed with the powder in  
42 them. I went downstairs to the senator's wet bar to take this photo before I started at 10:30 to  
43 offer the drinks. This is probably the least fancy part of this house, but I didn't want to interrupt  
44 the party by drawing attention to myself by having someone taking pictures of me.  
45  
46 Q: Can you explain your caption? Why did you say, don't go home alone tonight, senator?



1 A: Well, that was me sort of playing on what he's known for, which is as a playboy, I guess. I  
2 don't know much about him, just what his reputation is. I was just making a joke. I didn't really  
3 mean anything by it. It was just supposed to be playful.

4  
5 Q: And you didn't find that inappropriate?

6  
7 A: It seems embarrassing now, especially in light of the night's tragic end.

8  
9 Q: Okay. And this photo, you posted it to TikTok and Instagram. Can you comment as to the  
10 engagement on the post? Just read out loud the numbers from Exhibit 1, if you could. And then  
11 read from Exhibit 2 for TikTok.

12  
13 A: Okay. So, on Instagram, this one got 5,176 likes. On TikTok, I got 4,687 likes, but 8,000  
14 views.

15  
16 Q: Okay. And how many followers do you have on TikTok and Instagram?

17  
18 (PLAINTIFF'S ATTORNEY EMILY MICHAELS) Objection, asked and answered. Audrey,  
19 you can answer the question again.

20  
21 A: Currently, I have about 3,000 on Instagram and 3,000 on TikTok. I had more than that before  
22 the article.

23  
24 Q: Wow, that's a lot. And sorry, Emily. I'm forgetful today, obviously.

25  
26 A: It's Audrey.

27  
28 Q: Right, no, I meant your attorney. Sorry.

29  
30 A: Is there a question?

31  
32 Q: Sorry, yes. My question is, in your view, is 3,000 followers a lot?

33  
34 A: I think it depends on the person. It's nothing like that of an influencer. It takes like at least ten  
35 thousand followers to be on that level. But for a person who just uses social media to keep up  
36 with their friends, I think that's a lot.

37  
38 Q: Would you consider yourself an influencer?

39  
40 A: No way. Maybe I would have liked to be, eventually. But it takes time, and it can be  
41 something random that makes you blow up. Like those pictures of the models at the party with  
42 my drink could have made me blow up.

43  
44 Q: What do you mean by blow up?

45  
46 A: I mean, like, be known enough that I could sell my products easily. I would have loved to

1 make it onto the Target store shelves one day.  
2  
3 Q: Let's look at your next post, Exhibits 3 and 4, please. Exhibit 3 is for Instagram, and Exhibit 4  
4 is for TikTok. Can you read the caption on this one out loud and also describe what the  
5 photograph is?  
6  
7 A: Yes. So, this one is a boomerang of me and my friend Jackie doing a cheers photo with our  
8 greens at the party. The caption says: Sweet! Handing out my blossom powder drinks at Senator  
9 Stone's Soiree. Defeat bloating (and that extra serving of vegetables act as pre-vitamins to help  
10 prevent your hangover).  
11  
12 Q: Was the caption the same on TikTok?  
13  
14 A: Yes, I just automatically upload it to both from Instagram. So, whatever the post said on  
15 Instagram, it also says on TikTok. I link up my accounts, so they do that.  
16  
17 Q: Any specific reason you call your drink blossom powder?  
18  
19 (PLAINTIFF'S ATTORNEY EMILY MICHAELS) Objection, asked and answered. Go ahead  
20 Audrey, you can still answer.  
21  
22 A: Well, I picked the name blossom because it's feminine. Powder because it's a powder. I don't  
23 think I understand your question?  
24  
25 Q: You answered my question. I just wanted to know why you called it that.  
26  
27 A: Okay.  
28  
29 Q: How many Instagram and TikTok likes did you receive on those posts?  
30  
31 A: On Instagram, I got 3,131 likes. On TikTok, I got 5,012 likes, and, again, around 8,000 views,  
32 I think. Probably somewhere around there. Oh, I can see it in the exhibit. It looks like I got 7,500  
33 views.  
34  
35 Q: Okay, so let's move on to the next post. Can you flip to Exhibit 5, read, and describe that one  
36 for me, please.  
37  
38 A: This one says @EmmaTony enjoying #blossompowder. It's a picture I took of Emma Tony,  
39 another model, drinking my green drink. She posed for me upstairs. It was very nice.  
40  
41 Q: Can you talk about the Instagram and TikTok engagement you had on those posts?  
42  
43 A: Yes. So, on Instagram, I posted this to my Instagram story. I had 13,471 people like it. It  
44 shows up like hearts on the screen for me. 17,000 people viewed it. I tagged Emma Tony in the  
45 post. So, I think that's how a lot of people found it.  
46

1 Q: Okay, so that is a lot to you then, right?  
2  
3 A: Yeah, that's a lot. That's a lot more engagement than I was getting.  
4  
5 Q: Were you happy about that?  
6  
7 A: Yeah, it was great.  
8  
9 Q: And, looking at Exhibit 6, how many on TikTok?  
10  
11 A: On TikTok I had 8,000 likes, and it looks like 10,000 views.  
12  
13 Q: Do you have any idea why you had less on TikTok here, in comparison to Instagram?  
14  
15 A: Well, Emma has less of a following on TikTok, more so on Instagram. So, I think that's  
16 probably why. But for both on TikTok and Instagram, because this post had a famous model in  
17 it, I got a lot more interaction and engagement than I was getting previously.  
18  
19 Q: Let's move on to the last post of the night. Can you read and describe Exhibit 7 for me,  
20 please?  
21  
22 A: Sure. This one says: If you want to go to bed feeling your best, go to bed with  
23 #blossompowder! It wouldn't hurt to go to bed with @MikeyBobby, too, just ask @EmmaTony  
24 (who I just spotted leaving the party with @MikeyBobby, after taking cups of my green drink to  
25 go!). And this was a picture of Emma and Mikey leaving the party together.  
26  
27 Q: How many likes for this one on Instagram?  
28  
29 A: 5,072 for Instagram.  
30  
31 Q: Looking to Exhibit 8, same post, but for TikTok, how many likes?  
32  
33 A: 6,212 for TikTok.  
34  
35 Q: Okay. And how many views on TikTok?  
36  
37 A: Ten thousand.  
38  
39 Q: Why do you think you got so many views?  
40  
41 A: Because they're both pretty famous. I think what I was missing solely based off of posting  
42 Emma, in terms of engagement, was made up for by adding Mikey into it.  
43  
44 Q: Did you know who Mikey Bobby was?  
45  
46 A: Sure.

1 Q: For purposes of the record, who is he?

2  
3 A: He's an NFL player for the Washington Commanders. Not all of the Commanders are that  
4 famous. But Mikey Bobby? He is super-hot. Plus, he got even more well-known, especially to  
5 women, when he began dating Emma Tony. She started posting pictures on social media of them  
6 together.

7  
8 Q: Okay, and why did you choose to take this picture? I mean, was there a reason you chose  
9 them?

10  
11 A: Well, obviously, they're well-known. It would be awesome if they liked my drink and if they  
12 were photographed drinking it. I asked for their permission on both the photos, and they were all  
13 for it.

14  
15 Q: Did they know about the captions?

16  
17 A: Emma did. She thought it was funny. Everyone already knew they were dating, so Emma was  
18 totally cool with it. I think they actually just recently got engaged.

19  
20 Q: Okay, thank you for going through the posts with me. From going to this party, were you  
21 hoping to expand your potential business and sell your green powder?

22  
23 A: Yes, exactly. I mean, when I got the opportunity to serve my healthy drink at the end of the  
24 night, I thought that was great to get potentially a little more of a following. Once I was at the  
25 party and saw there were models there, I thought posting with them could help me get a real  
26 business going. I thought for a minute after that party that I'd gain the clout and following to get  
27 a manufacturer. Within days, I knew that would never come to be.

28  
29 Q: Were you hoping via this party to attract the attention of the Washington elite?

30  
31 A: I mean, I don't know about the Washington elite, as you say. I thought any attention to my  
32 drink would be great because I barely had any before the party, but I couldn't believe my luck  
33 when I saw models there who were known and could help me reach my target audience.

34  
35 Q: Would you prefer the attention of models over politicians?

36  
37 A: Yes, because I'm mostly targeting young women for this market. The models at the party  
38 were young women with girl-based social media followings. The politicians at the party were  
39 mostly men. Not that there aren't women in politics, but there seemed to be mostly male  
40 politicians and younger, attractive ladies at Senator Stone's party.

41  
42 Q: When did you find out about the death of Ms. Plaza?

43  
44 A: I didn't know anything until I opened my computer the next morning. It was all over the  
45 internet. It was big news across the country. A young woman died at a senator's party under  
46 mysterious circumstances. I was pretty shocked, you know, because I had been at that party and

1 interacted with her. She was so nice to me. What an awful thing to happen.

2

3 Q: At that point, meaning the day after the party, what did you know about the cause of death?

4

5 A: It was all just speculation at that point. Of course, I wondered if she did drugs or even if she  
6 was drugged. Police were calling the death suspicious. I'm sure people also wondered if it was  
7 an accidental overdose or something of that nature. That's where my mind went at first.

8

9 Q: When did you get more information on the cause of Plaza's death?

10

11 A: There were articles on Sunday and Monday about Plaza's death. The talk shows and  
12 newspapers were focusing on Senator Stone's political future, though, as a result of the death  
13 instead of the cause of death.

14

15 Q: When did you hear more information about the cause of Plaza's death?

16

17 A: On the Wednesday after the party. I got a call from a Columbia Examiner reporter in the  
18 evening at about 9:00 p.m.

19

20 Q: That would be on Wednesday, September 13, 2023?

21

22 A: Yes, that sounds right.

23

24 Q: Who called you?

25

26 A: It was Jessie Taylor. She told me she was a reporter with the Columbia Examiner and was  
27 investigating what happened at Senator Stone's party, involving the death of Daniella Plaza.

28

29 Q: What else did she say?

30

31 A: She told me that she had gotten ahold of a preliminary coroner's report from the coroner's  
32 office, and that the report seemed to suggest my powder had drugs in it and somehow caused  
33 Daniella's death.

34

35 Q: Did she tell you anything else?

36

37 A: Yes. She said that the coroner's report and police sources were saying that Daniella died from  
38 a cocaine overdose from my supplement powder.

39

40 Q: What was your reaction to the information the reporter gave you?

41

42 A: I was outraged. I asked the reporter what made her think the drugs came from my drink, and  
43 Taylor said that the coroner's report mentioned the only thing in Daniella's stomach was my  
44 green drink, and that police sources were saying she was not a drug user. Taylor also mentioned  
45 a comment on one of my Instagram posts.

46

1 Q: How did you respond to Taylor?

2

3 A: I told her there was no cocaine in my supplement powder, and that I've never done cocaine in  
4 my life.

5

6 Q: And then?

7

8 A: And then she said that Daniella hadn't eaten anything else and was not seen by anyone doing  
9 any drugs, and she was with people all night, but that she was seen pounding back my greens.

10 Then, she started cross-examining me about whether my drink could have had any cocaine in it,  
11 even if it wasn't intentional. Pretty much everything you've been implying during this deposition  
12 today, frankly.

13

14 Q: Can you please take a look at Exhibit 9 and read to me the comment on that post?

15

16 A: It says: Blossom powder??? No wonder she's so skinny. She's probably snorting powder  
17 instead.

18

19 Q: Any idea on what the person who wrote the comment was implying?

20

21 A: I mean, not really. They're body-shaming me, that's for sure. If I had to guess, she's trying to  
22 imply I do cocaine, and that makes me skinny. I doubt there's any science to that. Maybe cocaine  
23 makes you not hungry or lose weight? I wouldn't know. I've never done it, and there's  
24 absolutely no truth to that, if that was what she was implying.

25

26 Q: Audrey, the Columbia Examiner, in its September 14 article written by Taylor, quotes you as  
27 saying: It's not possible that my green drink caused the death of Daniella Plaza. It might have  
28 fixed a bloated tummy and treated a hangover before it could arrive, but it didn't kill anybody.  
29 Did you say those words to the reporter?

30

31 A: Yes, I very well might have. That sounds like something I said. But that's not all I said to the  
32 reporter. That's just all she quoted me as saying.

33

34 Q: What else do you think you told Taylor?

35

36 A: I told her a lot of things that I've said to you. I told her about how careful I am when I'm  
37 packaging up these things, but not to avoid drugs, because that wouldn't happen, but just like  
38 with a sterile surface and handwashing stuff. And I think I pointed out that if the green powder  
39 made Daniella high on drugs, how come nobody else was high on drugs or overdosed? Plenty of  
40 people at the party had my drink, and no one had a reaction. I told her what the coroner's report  
41 and the police sources said was untrue. I at least had nothing to do with it. To me, it seemed  
42 more likely that someone slipped drugs into her drink after I had given her drinks and packets.

43

44 Q: What did Taylor say after you told her these things?

45

46 A: She didn't say anything about my theory, but she mumbled something about "pounding back

1 shots of it.” Something like that. She thanked me for my time, and we hung up. When I read her  
2 article the next day, I felt like I got kicked in the stomach. It was so slanted. It was so wrong. I  
3 knew that any plans I had at moving my supplement drink business ahead were over. I didn’t  
4 know how to undo all the lies. My new business completely crashed after that. People really  
5 thought I killed that girl on purpose or on accident by letting drugs slip into the drink. People  
6 avoided me at the gym. I didn’t go for like two weeks. Again, I don’t do drugs, just to be clear. I  
7 had none that could slip into the drink packet. I’ve never even been around them. Again, that’s  
8 why I broke up with my ex-boyfriend.

9  
10 Q: Audrey, were you able to bring a few of your packets to this deposition to show me?

11  
12 A: Yes. Here they are.

13  
14 Q: Great, let’s mark this as Exhibit 10. Are these the same packets you used the night of the  
15 party?

16  
17 A: Yes, I had a few leftovers. This is from the exact same batch.

18  
19 Q: Okay, great. Thanks for bringing it. I’m going to take a picture of it, and we can mark that  
20 picture down as Exhibit 10 so we can have a clear idea of the packaging. I don’t need to keep it.  
21 You can take it home. Now, Audrey, when did you learn that the ingredients of your drink, in  
22 fact, did not contribute to Plaza’s death?

23  
24 A: Well, I always knew it. But it was on October 13 when the Columbia Examiner came out with  
25 another article. The article said that the Senator’s son Matt slipped fentanyl into Daniella Plaza’s  
26 glass of my drink. That was the drug that killed her. The article was based on an in-depth  
27 investigation and toxicology report produced by the coroner’s office and based on the confession  
28 of Matt Stone plus a few witnesses.

29  
30 Q: How did you feel after the October article came out?

31  
32 A: I was relieved at first. I felt vindicated. I knew that my drink didn’t cause her death, or at  
33 least I wasn’t at fault for it. So, it was nice knowing that other people knew that now, too. But,  
34 after a few weeks, I realized it didn’t make any difference. No one in the public really  
35 understood the truth. They still thought I was some coke-addict, and that my green drinks were  
36 dangerous, or that I was careless when mixing my ingredients. What’s sad is I wasn’t always  
37 going to be mixing my own ingredients. I was hoping to take off and be able to outsource to a  
38 factory that does this sort of thing. I thought this party might have put me on the map enough that  
39 night to finally do it. But that didn’t happen. I would never be able to actually sell my drink  
40 mixes, thanks to the Columbia Examiner’s false report. That’s when I decided to sue.

41  
42 Q: Thank you, Audrey. Finally, I want to mark for the record a picture of Ms. Adam’s Instagram  
43 as it stands now as Exhibit 11. I have no further questions at this time. Thank you all.



 audrey\_adams\_24  
Gatherings At The Senator's Mansion

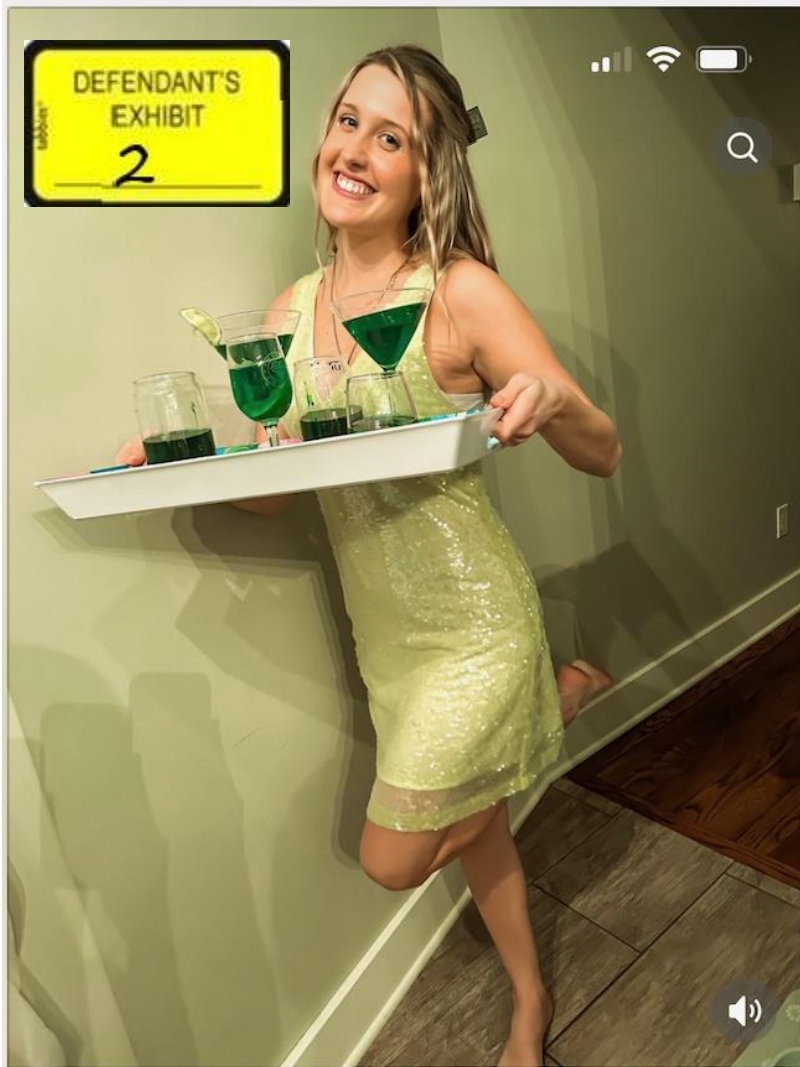
 audrey\_adams\_24 Don't go home alone tonight, Senator!  
Take one of my green drinks with you! #combatbloat  
#curethathangover #greensupplementpowder #greens  
#blossompowder

 Rylee\_McGee123  
You look amazing!!!! And funny caption lolol. Your drinks are  
amazingggg ❤️

    
5176 Likes  
13 weeks ago

 Add a comment... Post





Audrey Adams

Don't go home alone tonight, Senator! Take one of my green drinks with you! [#combatbloat](#) [#curethathangover](#) [#greensupplementpowder](#) [#greens](#) [#blossompowder](#)



Senators Mansion



we fell in love in october...

13 weeks ago  
8000 views

Add comment...



4687



212



20



4



**audrey\_adams\_24**

Gatherings At The Senator's Mansion



**audrey\_adams\_24** Sweet! Handing out my blossom powder drinks at Senator Stone's Soirée. Defeat bloating (and that extra serving of vegetables act as pre-vitamins to help prevent your hangover)!



**Emmy\_Belczak78** Gorgeous ladies ❤️🔥😘 Aud I HAVE to try this drink before my next workout. Text me



**Rylee\_McGee123** Love love LOVE it!

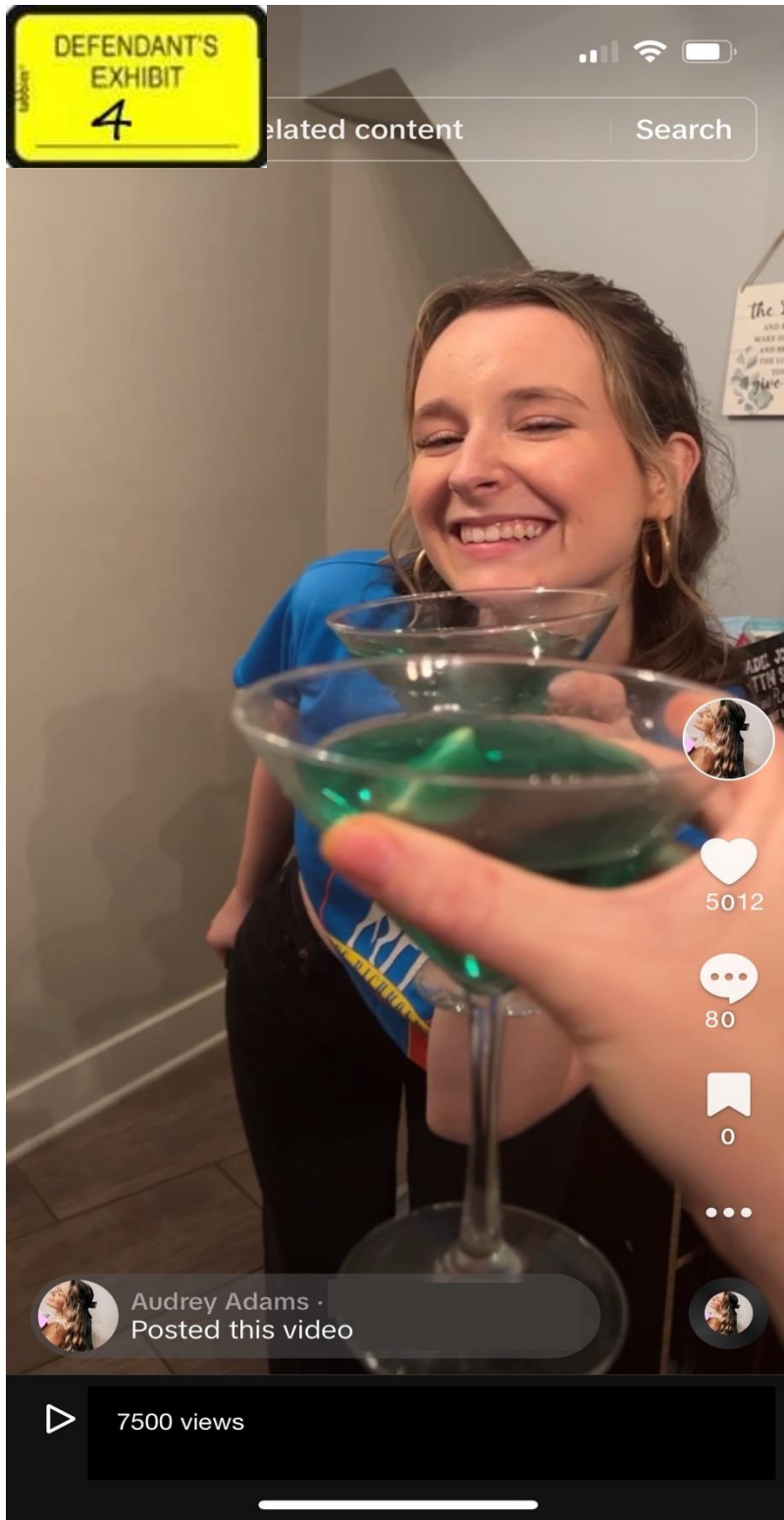


3131 Likes  
20 Weeks Ago



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Post



DEFENDANT'S EXHIBIT  
5

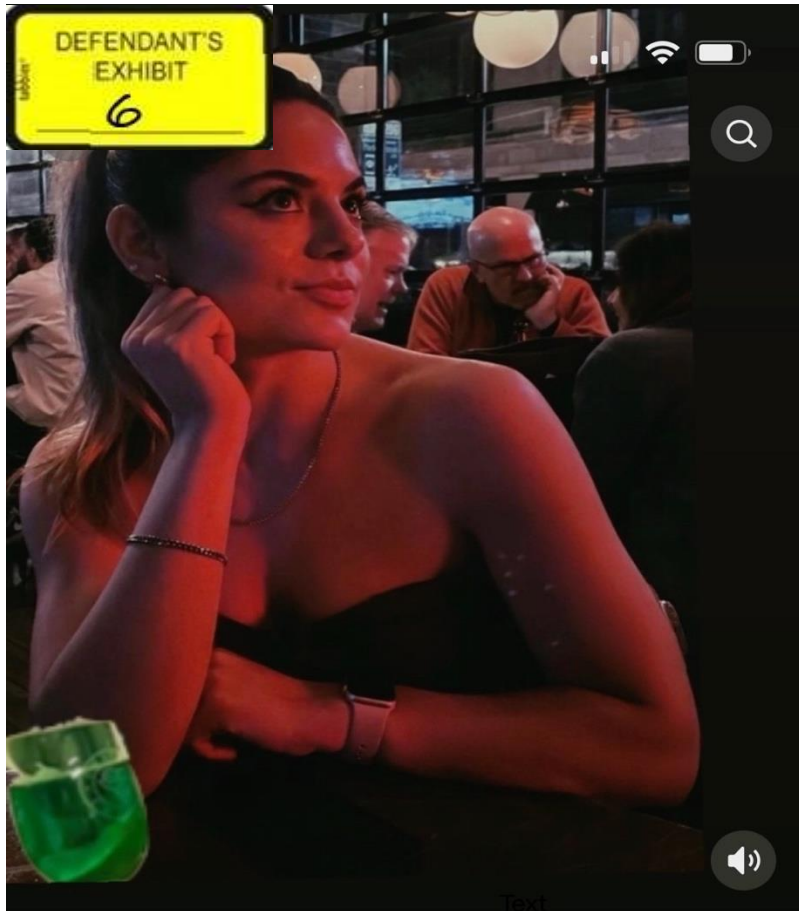
*@emmatony enjoying  
#blossompowder*



ESSENTIAL GREENS

Activity  
13471 views  
17000 ❤️

Create Facebook Send More



Audrey Adams



What's Luv? (feat. Ja-Rul...

**@emmatony enjoying #blossompowder**

10,000 Views

Add comment...



8000



99



5



0



**audrey\_adams\_24**  
Gatherings At The Senator's Mansion



**audrey\_adams\_24** If you want to go to bed feeling your best, go to bed with #blossompowder ! It wouldn't hurt to go to bed with @MikeyBobby too, just ask @EmmaTony (who I just spotted leaving the party with @MikeyBobby, after taking cups of my green drink to go!)



**Captain\_Davey72** Is this a preworkout?



**Rylee\_McGee123** It is :) my bestie makes it!



5072 Likes

13 weeks ago



Add a comment...

Post



**Audrey Adams**

If you want to go to bed feeling your best, go to bed with [#blossompowder](#) ! It wouldnt hurt to go to bed with @ MikeyBobby too, just ask @EmmyTony (who i jusy spotted leaving the party with @MikeyBobby, after taking cups if my green drink to go!)

 Perfect - @Ed Sheeran

10,000 views

Add comment...

  
6212

  
179

  
29

  
2



audrey\_adams\_24



**audrey\_adams\_24** Come down to my gym on Saturday to get a free sample of my supplement powder! Use as a pre-workout or a recovery drink 🍌🍌🍌



**Betsy\_Bae703** Blossom powder??? No wonder she's so skinny. She's probably snorting powder instead...



Reply



700 Likes  
22 Weeks ago



Add a comment...

Post







\_adams\_24



250 Posts

3000 Followers

1017 Following

Audrey

Fitness girl! University of Maryland '24

Following ▾

Message



Workouts



Fitness 🏆 ...



Greens 🥬 ...



Travel



Outdoor Run  
8:00 AM-9:57 AM

**Workout Details** [Show More](#)

Workout Time	Distance
1:56:51	13.08MI
Active Calories	Total Calories
1,680CAL	1,680CAL
Avg. Pace	Avg. Heart Rate
8'56"/MI	180BPM



**DEPOSITION OF JESSIE TAYLOR**

**(Excerpts)**

**November 3, 2023**

The following are excerpts from the transcript of the deposition of Jessie Taylor, taken at the law offices of Barker, Hess & White, LLC, 659 E Second St., Washington, D.C. 20543.

Present: Defendant Jessie Taylor, Plaintiff's attorney Emily Michaels, Defendants' attorney Charlie Hess, and court reporter Magnus Clark.

1 Q: (PLAINTIFF'S ATTORNEY EMILY MICHAELS) Ms. Taylor, what do you do for work?  
2

3 A: (DEFENDANT JESSIE TAYLOR) You can call me Jessie.  
4

5 Q: Okay, Jessie, what do you do for work?  
6

7 A: I'm a reporter for the Columbia Examiner.  
8

9 Q: What's the daily circulation of the Columbia Examiner?  
10

11 A: About 250,000. We have readers in D.C., Maryland, Virginia, and even farther out because of  
12 our online edition.  
13

14 Q: How long have you been a reporter for the Columbia Examiner?  
15

16 A: About five years.  
17

18 Q: How old are you, Jessie?  
19

20 A: Thirty-three.  
21

22 Q: Where did you work before you were a reporter at the Columbia Examiner?  
23

24 A: At the Hartford Courant.  
25

26 Q: That's in Hartford, Connecticut. Is that right?  
27

28 A: Yeah, it's in Connecticut. Largest newspaper there.  
29

30 Q: How long did you work for the Hartford Courant?  
31

32 A: Two years.  
33

34 Q: And what did you do before you joined the Hartford Courant?

1 A: I traveled and tried to get my name out there freelancing. I was a stringer for the AP for a  
2 while.  
3  
4 Q: What is a stringer?  
5  
6 A: I was basically a part-time reporter for the Associated Press. I covered night sports, just high  
7 school and college games, mainly.  
8  
9 Q: Where did you go to school?  
10  
11 A: I was a journalism major at Northwestern University.  
12  
13 Q: And it was after obtaining your degree that you traveled and wrote freelance articles?  
14  
15 A: Uh-huh.  
16  
17 Q: Jessie, could you please answer that question with a clear yes or no? The court reporter can't  
18 transcribe the nodding of your head. In writing, it is hard to tell what uh-huh means.  
19  
20 A: I'm sorry. The answer to your question is yes.  
21  
22 Q: Thanks. Where were you when you were a stringer for the Associated Press?  
23  
24 A: I lived with my sister for a while in Hartford and got the job there as a stringer for the AP.  
25  
26 Q: The stringing job must have gained you exposure at the Hartford Courant. Is that how you got  
27 the job there?  
28  
29 A: Yeah, but I wanted to try to get into a bigger paper and made my way up to the Columbia  
30 Examiner eventually.  
31  
32 Q: When did you join the Columbia Examiner?  
33  
34 A: January 2018.  
35  
36 Q: And what beat are you covering at the Columbia Examiner?  
37  
38 A: Typically, the police beat and also general assignment reporter stuff. Sometimes I do spot  
39 news, breaking gossip, or just whatever they need for breaking news and when the beat writer for  
40 breaking news can't handle it all.  
41  
42 Q: What is spot news?  
43  
44 A: It's like an unexpected event that's news, like a one-time or one-event story. If there's a  
45 follow-up, the follow-up usually gets turned over to a beat reporter. Occasionally I get to follow  
46 a story if I push to do it.

1 Q: Otherwise, you also cover the police beat, is that right?  
2  
3 A: Yeah, that's right.  
4  
5 Q: Were you covering the police beat the night of Senator Stone's party on September 8, 2023?  
6  
7 A: Yeah, I was.  
8  
9 Q: Did you write a story about the death of Daniella Plaza at that party that was published in  
10 print and online in the Saturday, September 9, edition of the Columbia Examiner?  
11  
12 A: Yeah, I did.  
13  
14 Q: Let's mark the September 9 article as Plaintiff's Exhibit 1, please. Thank you. Jessie, how did  
15 you come to do that story?  
16  
17 A: What do you mean?  
18  
19 Q: I mean the body of Daniella Plaza wasn't found until about 1:00 a.m. on Saturday, September  
20 9th. Were you at the newspaper at that time?  
21  
22 A: No, I got called in.  
23  
24 Q: How did the newspaper learn about the death?  
25  
26 A: It came over the police scanner. Our overnight obituary writer heard it. He called me a little  
27 after 1:00 a.m. He heard that a dead body was found at the Senator's place. He knew that would  
28 be a hot story that I would want to cover, so he called to let me know.  
29  
30 Q: Why would that be a story you'd want to cover particularly?  
31  
32 A: I had written about Senator Stone and his parties and behavior before.  
33  
34 Q: So, you were familiar with Senator Stone before this story?  
35  
36 A: Yes, definitely. I had written a couple of articles about him. He's pretty well known as the  
37 playboy senator. You can't really live in D.C. and not know that. Neighbors have called in noise  
38 complaints when he has thrown parties before. The police log recorded those complaints. I've  
39 written about some of the racy parties he's thrown in the past. Of course, I knew this story would  
40 be juicy.  
41  
42 Q: Why? Why was this story juicy?  
43  
44 A: It had all of the drama and gossip. A U.S. senator living life in the fast lane, of course. And a  
45 body found in his mansion after a drunk-fest. I mean, it was horrible, and horrible is front page  
46 news. This was definitely a big story.

1 Q: Where were you when you got the call about the death?  
2  
3 A: I was actually out at a bar with a few of my girlfriends. I drove over to Senator Stone's house  
4 as soon as I heard about it.  
5  
6 Q: Were you drunk?  
7  
8 A: No. I only had one glass of wine.  
9  
10 (DEFENDANTS' ATTORNEY CHARLIE HESS) Objection, relevance. The defamation claim  
11 in this case has nothing to do with Jessie Taylor's September 9 article. There has been no claim  
12 that the September 9 article defamed Plaintiff. I object to any questions pertaining to this article.  
13  
14 (PLAINTIFF'S ATTORNEY EMILY MICHAELS) But the September 9 article is relevant. It's  
15 hard to understand the full impact of the September 14 article, and why it was defamatory, unless  
16 you know how Daniella Plaza's death was initially reported. This line of questioning simply  
17 provides background and explains the defamatory nature of the September 14 article.  
18 Furthermore, it is relevant because Ms. Taylor wrote all three articles that directly reported on  
19 Plaza's death, a death inaccurately linked to Plaintiff.  
20  
21 (DEFENDANTS' ATTORNEY CHARLIE HESS) All right, Jessie, you may answer the  
22 questions, but I have to ask Ms. Michaels to focus her questioning on the September 14 article.  
23 Ms. Taylor's personal life outside of work is not relevant.  
24  
25 Q: Jessie, what happened when you arrived at Senator Stone's house?  
26  
27 A: The police tape was up. Most everyone was gone, but there were a few stragglers who had  
28 been at the party outside on the sidewalk. I managed to interview a few of them.  
29  
30 Q: How many people did you interview?  
31  
32 A: Maybe seven or eight people.  
33  
34 Q: Did any of those interviews make it into the Saturday, September 9, article in the Columbia  
35 Examiner?  
36  
37 A: Yeah, a few. I used what people told me about it being a big drinking party.  
38  
39 Q: What about the remaining interviews? What did you do with those?  
40  
41 A: I'm sorry, what do you mean?  
42  
43 Q: I mean, did you ever use those quotes for anything, or did you ever use those people as  
44 sources for anything?  
45  
46 A: Well, I called some of them again later for the second story, but I didn't quote anyone

1 directly.

2

3 Q: What did these witnesses tell you?

4

5 A: Well, I had multiple witnesses tell me they saw Daniella Plaza pounding back the green  
6 drinks toward the end of the night. They said they saw her drink at least five. One partygoer  
7 recognized Ms. Adams from Instagram. Witnesses said they did not see Daniella Plaza eat or  
8 drink anything else at the party except these green drinks.

9

10 Q: At this time, did you know it was Daniella Plaza who had died?

11

12 A: I assumed so because it seems that's who the witnesses were talking about. But then I saw a  
13 couple cops that I knew, and I asked them what happened. They didn't have a lot of details, but  
14 they did tell me it was Daniella Plaza who died. So, at that point I took her name back to the  
15 office and ran a check on her.

16

17 Q: Did you talk to Police Captain Manual Quintana?

18

19 A: No, not at that time. I called him later in the morning on Saturday, about 10:30 or so, to get  
20 the latest information I could. That's when he called Ms. Plaza's death suspicious. He said the  
21 police were investigating. That part I published in the article.

22

23 Q: Did you go anywhere else besides Senator Stone's party to do interviews for the September 9  
24 article?

25

26 A: No. I did the rest of my work by phone.

27

28 Q: When did you do the work by phone?

29

30 A: That morning.

31

32 Q: What time was your deadline?

33

34 A: For the print edition, most stories have to be in by like 7:00 p.m. the night before publication,  
35 11:30 p.m. at the latest if it's a meeting story, like a city council or school board meeting,  
36 something like that. But a front-page, breaking story, like the one on September 9, it can go later.  
37 I don't have to have it in by the night before. My deadline was 11:30 a.m. Editors have a few  
38 minutes to go over it, but they have to send it through for final page layout by noon. But that's  
39 for the print edition. The web version of a big story like this gets updated several times as more  
40 information comes in. Hot stories are usually posted several hours before the print edition is  
41 published. The September 9 on-line version of the article was published around noon, I think.

42

43 Q: The Columbia Examiner is an afternoon paper, is that correct?

44

45 A: Yeah, that's right.

46

1 Q: What time does the newspaper hit the streets in the afternoon?  
2  
3 A: Trucks distribute the earliest edition by 3:00 p.m. Newspapers start making it in residential  
4 mailboxes by about 4:30 p.m., I think, and web versions of stories are updated several times per  
5 day.  
6  
7 Q: The same September 9 article that first appeared online around noon went out in the afternoon  
8 print version of the paper?  
9  
10 A: Correct.  
11  
12 Q: After interviewing partygoers at Senator Stone's house, back at home what else did you do to  
13 prepare the story?  
14  
15 A: I called the Senate Majority Leader Ximena Ruiz at home and interviewed her. I also called  
16 some other senators who didn't want to be quoted on the record, but they gave me comments. I  
17 talked to a senator's aid who was at the party, and him I quoted, although without naming him. I  
18 called some political analysts. After I looked into Plaza's history, I called her parents' publicist. I  
19 didn't think I would be able to get ahold of her parents, and the death was so new I didn't want to  
20 be entirely insensitive. I asked the publicist if she thought Plaza's parents would be willing to  
21 talk, and the publicist said not at this time.  
22  
23 Q: What about Senator Stone?  
24  
25 A: Him I was definitely trying to get ahold of. I finally got ahold of his chief of staff Natalie  
26 Duff.  
27  
28 Q: Do you think of yourself as a pretty thorough reporter?  
29  
30 A: I definitely like to think of myself as that. I turn over all the stones I possibly can if I have  
31 time.  
32  
33 Q: Are you a fast reporter?  
34  
35 A: Absolutely. You have to be when covering what they call the cop shop. There's breaking  
36 news there all the time. If you're too slow, you're going to be out a job.  
37  
38 Q: What happened after your story broke on September 9 about Daniella Plaza's death at Senator  
39 Stone's party?  
40  
41 A: All the other newspaper picked it up after that. AP ran it. It made it into newspapers across  
42 the country. Local radio and other newspapers did their own stories, too.  
43  
44 Q: Were there any follow-up stories?  
45  
46 A: Oh, yeah. It stayed front-page for a couple days and was discussed on the Sunday talk shows.



1 Q: What were the subsequent stories about?  
2  
3 A: Most of them were by political analysts speculating about Senator Stone's future career as a  
4 senator. They were comparing the incident at Stone's party to other recent scandals about  
5 congressmen misbehaving.  
6  
7 Q: Did the Columbia Examiner publish articles like this?  
8  
9 A: Yes, it did.  
10  
11 Q: Did you write those pieces?  
12  
13 A: No. One of the political writers at the paper wrote them.  
14  
15 Q: Were there any other articles published that focused on the cause of Plaza's death before  
16 yours on Thursday, September 14?  
17  
18 A: No. Police were taking their time investigating. There was no new news. Everyone was just  
19 more focused on Senator Stone. It's not like people weren't reporting on it, but they were  
20 reporting on Senator Stone having a dead body at his house and his scandalous parties, not about  
21 what happened to the girl.  
22  
23 Q: Were you following the story, trying to get information on Plaza's death on Sunday and  
24 Monday?  
25  
26 A: Yeah, I was. I was trying all my sources, but nothing new was happening.  
27  
28 Q: You published a story that focused on the cause of death, though, on Thursday, September 14,  
29 isn't that right?  
30  
31 A: Yeah, I did.  
32  
33 Q: I am marking this article as Plaintiff's Exhibit 2. Let the record show that I am handing this  
34 exhibit to Defendant. Jessie, can you tell me what I just handed you?  
35  
36 A: It's the article from the Columbia Examiner. It's entitled: GREEN POWDER OR WHITE?  
37 MODEL FOUND DEAD AT SENATOR'S BASH. It was published on September 14, 2023.  
38  
39 Q: Please look at the byline of the article. Did you write that article?  
40  
41 A: Yeah, that's my byline. That's my story.  
42  
43 Q: Jessie, let me call your attention to the third paragraph of the article. Can you read the first  
44 sentence in that paragraph?  
45  
46 A: It says: Plaza's death was directly linked to the ingredients in the green supplement powder

1 drink, according to a preliminary coroner's report obtained by Columbia Examiner.  
2  
3 Q: Tell me, how did you get your information from this sentence?  
4  
5 A: I got it from a coroner's report that was leaked to me by a source.  
6  
7 Q: Can you tell me how you got ahold of the coroner's report?  
8  
9 A: I got a call on that Wednesday afternoon from my source.  
10  
11 Q: What time did the call come through?  
12  
13 A: About 2:00 p.m. that day.  
14  
15 Q: That day would be Wednesday, September 13?  
16  
17 A: Yes.  
18  
19 Q: Who was the call from?  
20  
21 A: It was from Garrett Krupa. He's a detective, a source of mine with the D.C.P.D. That's the  
22 D.C. Police Department.  
23  
24 Q: And what was it that Detective Krupa told you?  
25  
26 A: He gave me a tip that the coroner's investigation of Plaza's body had turned up something  
27 interesting.  
28  
29 Q: What did he say the coroner found?  
30  
31 A: Well, he didn't tell me exactly. He asked for my fax number, which of course I don't have. I  
32 gave him my email, and he sent me a picture of a document.  
33  
34 Q: What did he send you?  
35  
36 A: It was a photo of a copy of a preliminary coroner's report.  
37  
38 Q: I am marking this document as Plaintiff's Exhibit 3. Let the record show that I am handing  
39 you a copy of a document titled Preliminary Coroner Report. Do you recognize this document?  
40  
41 A: Yeah.  
42  
43 Q: Can you tell me what it is, please?  
44  
45 A: It's a copy of the preliminary coroner's report that Detective Krupa emailed me.  
46

1 Q: Is there a signature at the bottom? Can you tell me who signed it?  
2  
3 A: It's signed by Beatrice Grey. She's the District of Columbia coroner.  
4  
5 Q: You're familiar with her?  
6  
7 A: Yeah, she's the chief coroner for D.C., so I've seen her name before.  
8  
9 Q: What did you find interesting in the coroner's report?  
10  
11 A: The coroner's report linked Plaza's death to the green supplement power.  
12  
13 Q: Can you read from the report what you found to be the most interesting part? And tell me  
14 where in the report you are reading from?  
15  
16 A: Sure, but let me look at it again for a minute. Well, okay, a couple of places. First, on the  
17 second page under cause of death, the report indicates, quote, condition of body is not suggestive  
18 of but not inconsistent with drug overdose, unquote. And right after that it indicates a possible  
19 link to the contents of the green drink. Obviously, that caught my eye. Then, it says that there is  
20 no known history of illicit or recreational drug use in the victim. So, that made me scratch my  
21 head a bit. Then, on the next page in the comments section, it says that there was only the green  
22 drink in the victim's stomach and no evidence of other food.  
23  
24 Q: Why were these parts so interesting to you?  
25  
26 A: Because it was the first anyone knew about what caused Ms. Plaza's death. It was evidence of  
27 how she died. That was big news, and nobody had reported it yet.  
28  
29 Q: Did you include all this information in your article that was published on Thursday,  
30 September 14?  
31  
32 A: Yeah, it's all in there.  
33  
34 Q: Jessie, can you tell me, and read for me, the part of the article where you included the  
35 information from the coroner's report?  
36  
37 A: Yeah, it's what I read before. It's the third paragraph of the September 14 article. It says:  
38 Plaza's death was directly linked to the ingredients in the green supplement powder, according to  
39 a preliminary coroner's report obtained by Columbia Examiner.  
40  
41 Q: Did you quote the coroner's report exactly in writing that sentence?  
42  
43 A: No, I paraphrased it. But it's pretty close.  
44  
45 Q: Can you please read the exact statement or statements from the coroner's report that you  
46 paraphrased?

1 A: The coroner's report says: Possible link to green drink contents under further investigation.  
2  
3 Q: Your paraphrased statement has a different meaning than the sentence you just read from the  
4 coroner's report, doesn't it?  
5  
6 A: I think the meanings are pretty close.  
7  
8 Q: Why do you think the meanings are close?  
9  
10 A: I inserted the word ingredients for contents, which is pretty much the same thing. The  
11 contents or ingredients of the powder are obviously placed in the drink during the drink-making  
12 process. Or else it would just be water. It's the same thing.  
13  
14 Q: Does the word contents necessarily have to refer to the powder's ingredients?  
15  
16 A: Well, I wondered whether contents could have meant something else that was in the drink  
17 other than the powder. But that seemed like a long shot. I knew witnesses saw Plaza pounding  
18 back green drinks, which I took to mean Plaza was picking up a drink and immediately drinking  
19 it. The coroner's report was pretty clear that whatever killed her came from the drink.  
20  
21 Q: What about the fact that you stated in your article that Plaza's death was directly linked to the  
22 drink's powder, and the coroner's report says that a possible link was still under investigation.  
23 It's not the same thing, is it?  
24  
25 A: Well there was a link. I got that correct.  
26  
27 Q: But it's not the same, is it? Possible link and direct link?  
28  
29 A: There was a link. I got that right.  
30  
31 Q: What about how you said it was linked to the powder instead of the drink? The preliminary  
32 report says possible link to green drink not possible link to green powder. Explain that if you  
33 would, please.  
34  
35 A: Sure, but the report also stated they were getting toxicology of the drink and the powder. It all  
36 implied it had something to do with the powder that was going into these glasses of water. The  
37 terms powder and drink seemed to be used interchangeably in the report. My witnesses saw Ms.  
38 Plaza pounding back drinks. This explains why only she got sick from the powder. The  
39 supplement powder could have contained a small amount of cocaine to pep up the user, since it  
40 was touted to provide energy and promote weight loss, but not enough to cause an overdose  
41 unless someone ingested a whole bunch of it fast. Not long after pounding the greens, she died.  
42  
43 Q: Did your witnesses tell you that Audrey Adams was also giving out packets of the supplement  
44 that partygoers could mix for themselves later?  
45  
46 A: I don't remember.

1 Q: Were you aware before the September 14 article that Ms. Adams gave Ms. Plaza drink  
2 packets for later?

3  
4 A: I think I knew that. I recall that witnesses said the drink was disgusting. Plaza seemed to be  
5 the only person who liked the stuff. Everyone else dumped it after one sip. That's why it was  
6 funny and memorable to see Plaza slurping it up. I think I remember people saying she took  
7 packets with her, too.

8  
9 Q: Given that Ms. Plaza took packets with her to mix later, did you wonder whether the  
10 contamination in the drink or the powder could have been placed there by someone other than  
11 the creator of the drink? The coroner's report doesn't say cocaine was placed in the drink by the  
12 creator of the drink, does it?

13  
14 A: It crossed my mind that someone could have drugged the drink or that maybe Plaza did drugs,  
15 originally. But I changed my mind. As I said, the coroner's report was pretty clear. She didn't do  
16 drugs. The witnesses were also pretty clear. They saw her pounding back five or so of these  
17 drinks. It seems she took the drinks right off the tray and slammed them. Hindsight is 20/20. At  
18 the time, the story I came up with was the most plausible from my perspective.

19  
20 Q: But your take on the story turned out to be wrong, didn't it?

21  
22 A: Yes, the September 14 article was wrong. But it wasn't conclusive. I clearly stated that it was  
23 a preliminary coroner's report. I said it was still being investigated. I never conclusively said  
24 Adams was at fault. My article was based on the coroner's report, but the report was wrong.

25  
26 Q: What was the truth?

27  
28 A: It turned out that Matt Stone, son of senator Stone, Plaza's brand-new boyfriend at the time, if  
29 you could even call him that, to my understanding they had just started dating, slipped fentanyl  
30 into one of the green drinks that she was going to take to bed with her. Matt had just seen Plaza  
31 kissing his father, I mean the senator, in the kitchen after the party broke up, just before going to  
32 bed with Matt, the son. Crazy, huh? Before bed, Matt was holding Plaza's green drink for her, or  
33 she had set it down, I can't remember now, but Matt Stone slipped fentanyl into the drink when  
34 Plaza wasn't looking. It killed her, like it's killing everyone else. It's terribly horrific, and I don't  
35 think I or anyone else could have seen it coming.

36  
37 Q: Did you publish an article about this?

38  
39 A: Yeah. I stated it clearly in the October 13 article that it wasn't cocaine in Ms. Adams'  
40 supplement powder that led to Plaza's death. It was fentanyl that was put into the drink  
41 separately from Ms. Adams' powder mix. The article exonerated Ms. Adams.

42  
43 Q: How did you become aware that there was fentanyl slipped into Plaza's drink?

44  
45 A: The coroner's toxicology report, which came out in October, found evidence of fentanyl in  
46 Plaza's bloodstream. Police made that information public through a press release. A witness

1 came forward who saw the Senator's son put something into a drink but didn't report it because  
2 he didn't think it was suspicious until he saw the Senator's son's behavior at Plaza's funeral. On  
3 top of all that, the Stone kid ended up confessing.

4  
5 Q: Were you aware that the coroner was running a toxicology test on Plaza?  
6

7 A: Yeah, it was in the preliminary report.  
8

9 Q: Your article came out in the Columbia Examiner on October 13, 2023, is that correct?  
10

11 A: Yeah, for the last article on this topic, that was the correct date, yeah.  
12

13 Q: Okay, I'm marking the October 13, 2023, article as Plaintiff's Exhibit 4. And the article that  
14 implied Ms. Adams killed Daniella Plaza, that came out on September 14, 2023? So, about a  
15 month earlier, right?  
16

17 A: Well, a bit less, but close, sure.  
18

19 Q: That's more than enough time for the wrong information in the September 14 article to  
20 destroy the reputation of Audrey Adams, isn't it?  
21

22 A: I really don't know anything about that or her reputation. You'd have to talk to her.  
23

24 (DEFENDANTS' ATTORNEY CHARLIE HESS) Objection, you are asking my client to  
25 answer a question that calls for pure speculation. You are asking my client a question she cannot  
26 answer.  
27

28 Q: I withdraw the question. Please strike the answer by Defendant. Jessie, now I want to call  
29 your attention to a different section of your September 14 article that was published in the  
30 Columbia Examiner. Can you please read aloud the fourth sentence in the second paragraph?  
31

32 A: Sure. It says: According to police sources, Plaza suffered from a cocaine overdose. Do you  
33 want me to continue?  
34

35 Q: No, that's fine. Who are the police sources you are referring to in that sentence?  
36

37 A: I got that information from my source at the D.C.P.D., Garret Kruppa.  
38

39 Q: When did you talk to Garrett Krupa? I thought he only emailed you the coroner's report.  
40

41 A: Well, I had some questions for Garrett after seeing the coroner's report, so I called him back  
42 that Wednesday the 13<sup>th</sup>. It took several tries that afternoon, but I finally got ahold of him a few  
43 hours later.  
44

45 Q: What did you want to know from Krupa?  
46

1 A: I wanted to find out more about the contamination of the drink. I asked him what he knew  
2 about that.  
3  
4 Q: What did Krupa say?  
5  
6 A: He said, just like I stated in the article, that Plaza drank a bunch of the drinks, it turns out  
7 there was cocaine in the supplement powder, and it killed her. Garret said that's what it sounds  
8 like happened. At least that's what the coroner thought happened. Or that's what he thought the  
9 coroner thought happened.  
10  
11 Q: How do you know what the coroner thought? The coroner's report doesn't mention that the  
12 supplement powder had cocaine in it, does it?  
13  
14 A: No, I got that from Krupa. The report mentions an overdose. It mentions the green drink. It  
15 mentions the powder. But Krupa linked cocaine to the drink.  
16  
17 Q: Did Krupa tell you that he had talked with the coroner, and that's what the coroner said?  
18  
19 A: He gave me the impression that he had talked with the coroner about it, but he didn't say so in  
20 so many words.  
21  
22 Q: So, you don't actually know if Krupa talked to the coroner?  
23  
24 A: No, I don't.  
25  
26 Q: Is it possible that Krupa never talked to the coroner?  
27  
28 A: It's possible.  
29  
30 Q: What did you do next after hanging up with Krupa?  
31  
32 A: I talked to my editor. I told her I had a good story, but I would need time to get some sources  
33 on the phone. I told her there was no way I could get it to her by the 7 o'clock deadline.  
34  
35 Q: What did your editor say?  
36  
37 A: Well, she told me to hustle. She wanted that story to be in Thursday's print edition badly. She  
38 thought it would go page one. She said she was going to write a budget line for it.  
39  
40 Q: What's a budget line?  
41  
42 A: The newspaper puts together a budget every day that gives a thumbnail sketch of each story  
43 that is expected to appear in the next day's paper. Editors feed budget lines about each story to  
44 the city editor, who puts together the overall budget. Then, all the editors go to a meeting to talk  
45 over the stories that are planned for the next day. They lobby for stories they put on the budget.  
46 The editors, as a group, decide what stories will run where, depending, of course, on how the

1 stories pan out. Once a story is on the budget, though, it's expected to run.

2

3 Q: Is it a big deal to have a story budgeted for the front page?

4

5 A: Yeah, there's a lot of emphasis put on those stories. It's kind of a crown jewel for an editor, to  
6 have reporters who can land page one stories.

7

8 Q: What did you do after you talked to your editor?

9

10 A: After that, I called Stone's office to try to confirm that Ms. Adams was handing out the  
11 powder-packet-drinks at the party. I wanted to see if they knew anything about whether she  
12 packages them up at home by herself or what. But I didn't get any answer there. Best I could do  
13 was leave a message for his spokesperson.

14

15 Q: What did you do then?

16

17 A: I grabbed my notebook to look for the names and phone numbers of people at Stone's party  
18 and started calling. It took me a while before I got anybody. Some called me back.

19

20 Q: What information did you get from them?

21

22 A: Many of them told me the girl who made the drinks at the party was all dressed up in a  
23 sparkly green dress, handing out the drinks. One person at the party actually told me she knew  
24 who the girl was because she had a social media following, and some of the girls, or as we know  
25 now, Ms. Adams' friends, were a bit well-known and had a following.

26

27 Q: Did these people who attended the party tell you anything else?

28

29 A: Yeah. One mentioned that Ms. Adams was able to hand out her greens at the party because  
30 her friend is an intern on the hill. And she told me that she makes the supplement powders at  
31 home because she doesn't have the in she would need to get it sent out to a manufacturing plant  
32 or anything. This was like a home project of hers. Nothing on the market yet, just handing this  
33 stuff out for friends, trying to get a name for herself. I asked if she knows if anyone assists her in  
34 packaging up the powder, and the witness I talked to said, as far as she knows, Audrey does it all  
35 alone. The witness was sort of friends with Audrey, but not super-close. Acquaintances, more  
36 like it. I asked her if the supplement powders were supposed to be about getting thin. She said,  
37 yeah, totally, that is implied, and that Audrey was trying to sell her own thinness. I asked if  
38 Audrey did drugs. She said, supposedly no, but she sure looks like she's snorting some powder.

39

40 Q: Did you learn anything else from partygoers?

41

42 A: They said that green drink was disgusting. They said most people took a sip, made a face, and  
43 handed off the drink to someone to take away or left the rest on a table. They said Plaza,  
44 however, ate and drank nothing all evening but was slamming back the greens.

45

46 Q: Anything else?



1 A: I don't think so.  
2  
3 Q: After talking to the party guests, what did you do?  
4  
5 A: Well, I decided to look into Audrey Adams. I quickly found her Instagram. There were quite a  
6 few pictures of her promoting her drink on her account. Some were workout videos, other just  
7 regular old selfies. Pictures of what looked like a boyfriend, not sure if past or current. Her  
8 Instagram was pretty popular. I mean, at least in comparison to my personal account.  
9  
10 Q: Did you find anything else?  
11  
12 A: I found her TikTok. Her TikTok also promoted her drink. Oh, I forgot to mention, on her  
13 Instagram, I went to the photos she is tagged in. That's usually where the good stuff is because  
14 people won't post it themselves, but you can really figure out a lot about a person by what their  
15 friends tag them in. She was tagged in pictures from some swanky D.C. parties alongside the  
16 nepo babies.  
17  
18 Q: What are nepo babies?  
19  
20 A: It's short for nepotism baby. It's a term used when referring to the children of rich parents  
21 who get things they didn't earn, especially if the kid is in the same field as the parent. It implies  
22 nepotism is the reason the kid is successful or famous or popular or whatever.  
23  
24 Q: So, you are saying that some of Ms. Adams' friends were nepo babies?  
25  
26 A: Totally.  
27  
28 Q: Like whom?  
29  
30 A: Like Kylee McGee.  
31  
32 Q: Hmm. Anyhow, back to Ms. Adams' TikTok account. What were you saying you found  
33 there?  
34  
35 A: Mostly more videos promoting her drink, working out, showing off her body, stuff with  
36 friends. Nothing out of the ordinary for young women her age. Oh, also, on Instagram, the one  
37 thing that stood out to me on that is, on a photo promoting her supplement powder, there was a  
38 comment that said something about her drink powder, and then it said the reason she is so skinny  
39 is because she's snorting the powder. Like, implying cocaine.  
40  
41 Q: How do you know that comment was implying cocaine?  
42  
43 A: It seems pretty obvious. Cocaine makes people skinny, that's well-known. Cocaine gives  
44 people energy. Cocaine typically gets snorted. It's in the form of a powder. Blossom Powder  
45 may have been Adams' attempt to even imply the link to cocaine. Adams didn't respond.  
46

1 Q: After researching Ms. Adams, what did you do next?  
2  
3 A: That's when I called her.  
4  
5 Q: What did you say to Ms. Adams?  
6  
7 A: Well, I told her about the coroner's report and the speculation that her supplement powder  
8 might have had cocaine in it and might have caused Daniella Plaza's death.  
9  
10 Q: How did Ms. Adams respond to that?  
11  
12 A: She denied it all. She denied that her supplement powder could possibly have contained  
13 cocaine. She insisted that her drink didn't kill anybody.  
14  
15 Q: What did Ms. Adams say specifically about the implication that her supplement powder  
16 contained cocaine?  
17  
18 A: She told me there was no possible way drugs got into her supplement powder. She said, once  
19 she hands off the powder, there's no telling. She said that someone else could put something into  
20 it, but that she definitely did not. And she said, unless someone tampered with the packaging  
21 after she had handed the packets out, there's no way any drugs could have gotten in there  
22 because she didn't do any.  
23  
24 Q: Why didn't you put these comments in the article that was published on September 14?  
25  
26 A: I quoted her denying that her supplement powder caused Plaza's death. Everything else she  
27 said was pretty much the same thing, just denying that she did it.  
28  
29 Q: Any particular reason you didn't believe Ms. Adams' version of events?  
30  
31 A: I mean, no one is going to admit they do drugs to a reporter. No one trying to start up a  
32 business selling these greens is going to admit the energy boost and weight loss is due to her  
33 adding a little cocaine to the veggies. I didn't think Adams meant to hurt or kill anyone. I felt a  
34 little bad for her. But after all the evidence I had gathered, the coroner's report, the witnesses, the  
35 statement from my source at the police station, the comment on her Instagram, it seemed pretty  
36 open and shut for me. It is my job to investigate and report.  
37  
38 Q: What happened after you talked with Ms. Adams?  
39  
40 A: Well, I decided I needed to get an independent expert to make a comment. I don't know  
41 anything about making supplements. So, I called the FDA after-hours hotline. They transferred  
42 me to Rob Underwood. I was lucky he was around that night because, apparently, he's the best  
43 person to talk to about this sort of thing.  
44  
45 Q: What did Rob Underwood tell you?  
46

1 A: Basically, he told me the FDA doesn't actually approve the contents in dietary supplements.  
2 Dietary supplements are like their own beasts.

3  
4 Q: Did he tell you anything else? Like in regard to what you quoted?

5  
6 A: Yeah. I asked him about the possibility of something bad getting into the powders, and he  
7 said because the FDA does not approve supplements, manufacturers and creators alike need to be  
8 careful regarding what they are putting in the supplements and also what they claim the  
9 supplement can do for people. I told him I was calling in reference to greens, and he laughed. He  
10 said it was a whole new craze. Said he doesn't understand why people don't just save their  
11 money and eat vegetables, said you'll digest the nutrients better that way than from an artificial  
12 powder form. But I wasn't really worried about that. I wanted to know his thoughts on how  
13 drugs could have gotten into the supplement. I asked him again, and he said, who knows,  
14 anything could be in there. He said supplements are the Wild West, especially if someone is  
15 home-making them.

16  
17 Q: Did you call anyone else?

18  
19 A: No, that was everyone I talked to that night.

20  
21 Q: Did you ever speak to the coroner before the story was published?

22  
23 A: No, I did not.

24  
25 Q: Why not?

26  
27 A: I didn't think it was necessary. I already had the preliminary coroner's report. Since it was  
28 still early, that wasn't going to change, and it spoke for itself. And I figured the coroner wasn't  
29 going to allow herself to be quoted anyways, not until she made the official report.

30  
31 Q: Did you have time to call the coroner?

32  
33 A: I honestly don't know. People like that can be hard to get ahold of on short notice. I got the  
34 preliminary coroner's report around 2:00 p.m., so there were probably a few hours in there. But,  
35 regardless, that's not really the point. I didn't call her because there was no reason to. I figured I  
36 had the preliminary report, and those were her words. I knew her signature. I've read her reports  
37 before. I knew it was authentic. And I got it from a police officer. It's not like he's going to forge  
38 it.

39  
40 Q: Let's turn back to that report again. If you turn to the second page, can you identify the  
41 section labeled cause of death?

42  
43 A: Yes, I can.

44  
45 Q: Could you please read the second sentence of that paragraph?

46

1 A: Out loud?  
2  
3 Q: Yes, please.  
4  
5 A: Okay, sure. It says, quote, condition of body, including deprivation of oxygen to the brain, is  
6 not suggestive of but not inconsistent with drug overdose, possible link to green drink contents  
7 under further investigation, unquote.  
8  
9 Q: Okay, now please turn back to your September 14 article. Do you have that?  
10  
11 A: Uh, yes, I do.  
12  
13 Q: Please read the third sentence of the third paragraph.  
14  
15 A: The medical examiners concluded that the condition of her body was consistent with a  
16 cocaine overdose.  
17  
18 Q: Is the source of that sentence in the coroner's report you just read a moment ago?  
19  
20 A: Yes.  
21  
22 Q: But you omitted the words, including deprivation of oxygen to the brain?  
23  
24 A: Yes, I did.  
25  
26 Q: Was that on purpose?  
27  
28 A: I mean, yeah. It just didn't feel relevant. She died from an overdose. The way it affected her  
29 brain wasn't really important and too technical for the general audience.  
30  
31 Q: You also omitted the words is not suggestive of, correct?  
32  
33 A: Yes.  
34  
35 Q: And you changed not inconsistent to consistent.  
36  
37 A: Yes. It means the same thing. The first way is way too confusing. It's a double negative.  
38  
39 Q: Did you make those changes intentionally as well?  
40  
41 A: Yes. I wanted to tighten up the quote, make it read better.  
42  
43 Q: You also replaced drug overdose with cocaine overdose. Why would you do that?  
44  
45 A: Because my source told me it was cocaine, and I thought he had talked to the coroner.  
46 Additionally, the comment on Ms. Adams' Instagram post and the frenemy witness made it seem

1 like she had been suspected of using cocaine. So, coupled with my source telling me it was a  
2 cocaine overdose, I figured he was right.  
3

4 Q: At the time you wrote the story, did you know anything about deprivation of oxygen to the  
5 brain and what causes that?  
6

7 A: Not really. I mean drugs, obviously, since that's what happened. But I'm not a doctor. I don't  
8 know the specific medical terms for different things, or what causes what.  
9

10 Q: So, you didn't actually know what can cause deprivation of oxygen? Or what kind of drugs  
11 specifically do that?  
12

13 A: Not exactly.  
14

15 Q: But you understand it in part?  
16

17 A: Yes. I got the gist that the drug caused a lack of oxygen to the brain, and that's, like,  
18 technically what killed her. Like I understand that the physical drug isn't killing you, but what  
19 the drug does to you kills you. In this case it caused a lack of oxygen to the brain. I mean, I think  
20 that's how it works. But I didn't need to understand the science behind deprivation of oxygen to  
21 understand the basic point of the sentence.  
22

23 Q: Don't you think the coroner could have clarified the precise meaning of that sentence for you?  
24

25 A: I don't know. Maybe. If I could get ahold of her, and if she was willing to talk to me.  
26

27 Q: Do you think a medical doctor could have clarified the meaning of that sentence for you?  
28

29 A: Maybe, I guess, depending on the doctor. But I knew what the report said. That drugs caused  
30 the death. I went with what I had. I had the coroner's report in hand. It was official. I thought it  
31 was a good source. And I had what Krupa had told me.  
32

33 Q: Are you telling me you couldn't hold the story a day to give you more time to interview more  
34 sources, like the coroner or medical doctors? You couldn't hold the story to thoroughly check its  
35 accuracy?  
36

37 A: No. Look, a dead body was found at Senator Stone's party. It was huge news across the  
38 country. From the moment it broke, it was a front-page story. There was a lot of pressure to do  
39 follow-up articles. Reporters were checking every lead they had to get something fresh for the  
40 next day copy. There was no way I could sit on that story another day. No way. Someone else  
41 might have gotten the coroner's report. I thought I had good sources. I reasonably believed so. I  
42 went with it.  
43

44 Q: What time did you finish the story that was published on Thursday, September 14?  
45

46 A: I filed the story about 1:00 a.m., somewhere around there, I think.

1 Q: Was an online version of the story published?  
2  
3 A: Yes.  
4  
5 Q: When?  
6  
7 A: The same day. I think the online version was posted around 8 a.m.  
8  
9 Q: Was the online version the same as the print version?  
10  
11 A: Yes.  
12  
13 Q: Okay, let's turn back to Detective Krupa. How do you know him?  
14  
15 A: Okay. Yeah, he was a source of mine. He'd given me some tips in the past.  
16  
17 Q: How many tips had he given you in the past that led to stories in the paper?  
18  
19 A: Um, he'd given me tips on three stories in the past before this one.  
20  
21 Q: What were the tips he gave you in the past?  
22  
23 A: Krupa tipped me off that Giovanni Longo, the guy who owned the big trash hauling company,  
24 was the murder suspect in a triple homicide in the District. It was a good story. Longo had been  
25 pursued for years on a money laundering scheme, but police could get nothing on him until the  
26 murder. I broke that story.  
27  
28 Q: When was it published?  
29  
30 A: 2019. Late 2019. I think November.  
31  
32 Q: What other stories did Krupa tell you about?  
33  
34 A: He gave me the lead on the local bank president who was being investigated for embezzling  
35 tens of thousands of dollars. Lucas Janssen, a Rotarian, a mason, a pillar of the church. Ends up  
36 he was ripping off the District Bank and trying to frame a lowly loan officer while he did it. It  
37 was a really good story. Nobody else had it but me. Krupa gave me that one, too.  
38  
39 Q: When was that story published?  
40  
41 A: Not too long ago. May 2023.  
42  
43 D: Did he give you any other story tips?  
44  
45 A: Yes, March. March 2023. It didn't turn out so well, though.  
46

1 Q: What was the story?

2  
3 A: Well, Krupa called me and told me that some high-ups in the D.C.P.D. were secretly planning  
4 a reorganization of the department. He heard that several high-ranking officers were going to be  
5 reassigned to undesirable jobs. The deputy police chief was going to be replaced. Krupa  
6 overheard some high-ranking cops discussing it. He tipped me off about it. He even gave me  
7 some notes that had been scratched onto the back of an envelope by one of the planners. I  
8 thought it was a good story. I ran with it.

9

10 Q: What happened?

11

12 A: Turned out, it wasn't such a good story. In fact, it was untrue. What Krupa overheard was  
13 actually plans by some members of the department for the annual D.C. Pig Roast that was  
14 coming up in April. At the Roast, several cops performed skits to poke fun at the department.  
15 The so-called reorganization of the department that Krupa leaked to me was really one of those  
16 skits in the planning stages. He didn't know it. I didn't either.

17

18 Q: How did the Columbia Examiner handle the situation?

19

20 A: We had to print a retraction. It was pretty embarrassing. It took a minute to get back in my  
21 editor's good graces.

22

23 Q: And that false article was published in March of 2023?

24

25 A: Yeah.

26

27 Q: Did you think about the botched police reorganization story when Krupa contacted you about  
28 that Plaza coroner report?

29

30 A: A little, but not really.

31

32 Q: It never crossed your mind that Krupa might be giving you faulty information even  
33 accidentally?

34

35 A: You know, you never forget a bad tip. But for this one, Krupa gave me the actual copy of the  
36 coroner's report. I knew it was real. I wasn't just relying on what he told me. Besides, he had  
37 already redeemed himself.

38

39 Q: Jessie, one more question. How did you feel when you found out in October that the article  
40 you printed on September 14 was substantially false?

41

42 A: Well, I wasn't happy, but there wasn't much I could do. I had a deadline to meet. It was a  
43 great story. My editor loved it. If I had any doubts, they were incredibly small compared to the  
44 evidence I had literally in my hand and the pressure on me to get it into print. And I said  
45 preliminary coroner's report. I made it clear that this was not the end-all-be-all of what  
46 happened. And I had to get it printed. You know, you win some, you lose some. In my business

1 there's always a tomorrow. And, today, you've got to feed the monster that is the public.

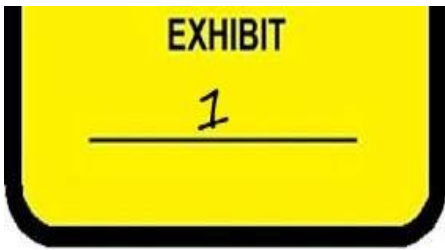
2

3 Q: Thank you, Jessie. No more questions at this time.

4

5 **(END OF EXCERPT).**





*The Columbia Examiner*

**MODEL FOUND DEAD IN PLAYBOY SENATOR’S MANSION FOLLOWING PARTY**

By Jessie Taylor  
*Columbia Examiner Reporter*

*This story was originally published on Saturday, September 9, 2023.*

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Questions?  
Email [JessieTaylor@CEReporting.com](mailto:JessieTaylor@CEReporting.com)

The lifeless body of model Daniella Plaza, daughter of Jimmy and Sydney Plaza, was found in U.S. Senator Jeff Stone’s mansion early this morning following a drunken bash at the senator’s house that lasted most of Friday night.

Daniella Plaza, 23, was found in the guest bedroom of Senator Stone’s home in the Georgetown neighborhood of Washington, D.C., at about 1 a.m. by Senator Stone’s son, Matt Stone. Matt had reportedly gone into the guest bedroom to go to sleep, but rather discovered the lifeless body of Ms. Plaza. Plaza, a beautiful model who had graced the covers of entertainment magazines in the D.C. area, was pronounced dead at that scene.

Police are calling Plaza’s death “suspicious” and have launched a full-scale investigation into the circumstances surrounding it. “At this point, we don’t know the circumstances that led to Ms. Plaza’s death. We haven’t ruled out anything,” said the Washington, D.C., Police Captain Manuel Quintana. “We are interviewing party goers and trying to get to the bottom of what happened.”

Plaza’s death is the latest scandal involving Stone, D-N.Y., who is known for his playboy antics and boozy, late-night parties with a lot of women, abundant food, and even more liquor, which have been chronicled in Washington, D.C., gossip columns. Events at past parties include intoxicated guests skinny dipping in Stone’s pool and members of Congress gulping “shooters” with female White House staffers. Last April, U.S. Representative Miguel Prado, D-Pa., was arrested for drunk driving after leaving one of Stone’s Friday night bashes. Police were called to the same party when a fight broke out between legislative aides who worked for members of congress.

“Senator Stone has been in the news a lot in the last couple years and not for good reasons,” said Senate leader Ximena Ruiz, R-Miss. “The death of this young woman at his party may have serious implications for the senator’s political future.”

Stone was not available for comment this morning, but his spokesperson Natalie Duff expressed public condolences to Plaza’s family.

“Senator Stone expresses his deepest sympathy to the parents and siblings of Daniella Plaza,” Duff said. “The senator has cooperated fully with the police investigation into her death and will continue to do so.”

The senator had met Ms. Plaza once before the party on Friday when his son had introduced her a few weeks prior. Plaza and the senator’s son were reported to be friends who had just recently begun dating one another. Spokesperson Duff continued: “Senator Stone is anxious to discover how this tragic event could have possibly occurred at his home.”

Plaza, the daughter of Hollywood actors, was a model who, in recent months, had appeared on the front covers of a few entertainment and fashion publications up and down the East Coast. She had recently moved to New York City for her modeling career, but she was known to frequently visit friends in the D.C. area. We have not yet reached out to Plaza’s parents for comment at the request of the Plaza’s spokesperson.

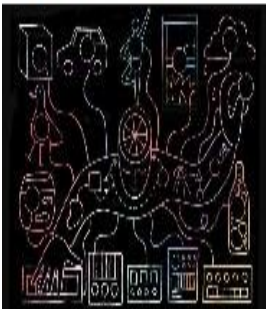
Stone, 48, a popular second-term senator, has held key positions on the influential Senate Finance and Labor Committees. He has introduced legislation to increase the minimum wage and to require standard, on-site protection procedures for workers who are at high risk for physical injury. He also coins himself as a champion for women’s rights.

*“Who knows what happened to her?”*

Democrats and Republicans alike have praised Stone’s attempts to muster bipartisan



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support for legislation. But political observers say, while the senator's gregarious nature helps him win over political enemies, it also brands him as a carousing playboy known for throwing lavish parties where members of Washington's elite go to eat, drink, and be, perhaps, *too* merry.

"Who knows what happened to her? There were not many sober people at the place, but I didn't know of any drugs," said a partygoer and senator aid for the U.S. house Democratic Caucus, who declined to be named. "This really makes you think twice about having too good of a time at a political party." Stone's Democratic colleagues in the Senate refused to comment publicly on Plaza's death or Stone's reputation as a Capitol Hill playboy. However, unnamed sources said Democrats in the U.S. House and Senate are concerned that Stone may have "a character problem" that is putting the future of his political career in jeopardy.

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The Columbia Examiner

**GREEN POWDER OR WHITE? MODEL FOUND DEAD AT SENATOR'S  
BASH**

By Jessie Taylor  
Columbia Examiner Reporter

This story was originally published on Thursday, September 14, 2023.

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Green supplement powder seems to have been laced or replaced with a white powder for party goer Daniella Plaza, who wanted to prevent bloating and fatigue but instead ended up dead at Senator Stone's bash over the weekend.

It was earlier reported that model Daniella Plaza, daughter of actors Sydney and Jimmy Plaza, was found dead in Senator Stone's spare bedroom over the weekend. A preliminary investigation has now revealed that her death is directly linked to a green supplement powder that had been served at Stone's party this weekend, touted as a hangover repellent, anti-bloating energy booster. Shortly after drinking these "greens," Plaza went to bed and never woke back up. According to police sources, her death was the result of a cocaine overdose. However, friends and family of Plaza say she was never a drug user, recreational or otherwise.

Plaza's death was directly linked to the ingredients in the green supplement powder, according to the preliminary coroner's report obtained by the Columbia Examiner. Medical examiners found remnants of a green liquid in Plaza's stomach. The medical examiners concluded that the condition of her body was consistent with a cocaine overdose. No history or evidence of drug addiction was noted. They are continuing to investigate the drink's ingredients, the coroner's report stated.

Plaza's father expressed outrage when contacted about this story. "Our daughter

was always, always very careful to stay away from drugs. She would not have willingly taken a drink she knew to have drugs in it. If it was handed to her and she took it, that meant she trusted that it was drug-free. She should have been able to trust that."

The creator of the green supplement powder, dressed to match the drink she was toting in an attention-grabbing sparkly green dress and high heels, actually passed out not only glasses of her suspicious drink to guests at Stone's party, but was also handing out the supplement powder packets like Halloween candy.

The supplement powder was created by Audrey Adams, a friend of a congressional intern, who was trying to make her way via social media into the health and fitness market. While most guests shunned the greens as "disgusting," a witness stated that Ms. Plaza was pounding back the green drinks like she was taking shots at the end of the party.

Adams had been posting about her green supplement powder on social media, coining the drink-mix "Blossom



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The Sad Truth About Sleep-Tracking Devices and Apps

Powder” and marketing it as a vegetable supplement for women that can combat bloating, prevent hangovers, and boost energy. “It’s not possible that the ingredients of my drink powder caused the death of Daniella Plaza,” Adams said in a telephone interview. “It might have fixed a bloated tummy and treated a hangover before it could arrive, but it didn’t kill anybody.”

“The FDA does not approve supplements, so manufacturers and creators need to be careful regarding what they are putting in their supplements and what they claim their

supplement does for people,” said Rob Underwood, an FDA official.

Adams, 24, is no stranger to the party scene. Her tagged photos on Instagram show that she was a frequent flyer at local D.C. parties attended by socialites and nepo babies. Additionally, photos on Adams’ profile from her Alma Mater suggest she was no stranger to sorority life at UCLA. Most recently, a commenter on her Instagram page wrote “Blossom Powder??? No wonder she’s so skinny. She’s probably snorting powder instead...” on one of her promotional photos for her drink. She did not respond to the comment.



Questions?  
Email [JessieTaylor@CEReporting.com](mailto:JessieTaylor@CEReporting.com)



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# Preliminary Coroner Report

Coroner/Deputy: Beatrice Grey<sup>2</sup>  
 Date of Call: 09/09/2023  
 Time of Call: 1:35AM  
 Person Calling: D.C.P.D.  
 Police Agency: D.C.P.D.

## Decedent Information

First Name: Daniella Last Name: Plaza  Male  Female  
 Address: 31 Jane St #16BC City New York City County of Residence: New York County  
 State of Residence: NY Zip: 10014 SSN: [REDACTED]  
 Age: 23 Surviving Spouse: N/A  
 Date of Birth: July 22, 2000 Mother's Maiden Name: Rahimi  
 Birth Place: New York, New York, USA Father's Name: Plaza  
 Height (Inches): 70 Eyes: BROWN Pregnant   
 Weight (Pounds): 125 Hair: BROWN Homeless   
 Veteran

Marital Status: <input checked="" type="checkbox"/> Never <input type="checkbox"/> Married 2. <input type="checkbox"/> Separated 3. <input type="checkbox"/> Divorced 4. <input type="checkbox"/> Married 5. <input type="checkbox"/> Widowed	Race 1. <input type="checkbox"/> White 2. <input type="checkbox"/> Black 3. <input type="checkbox"/> Asian <input checked="" type="checkbox"/> 4. Middle 5. <input type="checkbox"/> Native Eastern American 6. <input type="checkbox"/> Alaskan	Ethnicity 1. <input type="checkbox"/> Hispani <input checked="" type="checkbox"/> 2. c Not of Hispani c Origin 3. <input type="checkbox"/> Unkno wn	Employment: <input checked="" type="checkbox"/> Employed <input type="checkbox"/> Unemployed <input type="checkbox"/> Homemaker <input type="checkbox"/> Volunteer <input type="checkbox"/> Retired <input type="checkbox"/> Student <input type="checkbox"/> Disabled <input type="checkbox"/> Other <input type="checkbox"/> Unknown Place of Employment:	Education: <input type="checkbox"/> Elementary School <input type="checkbox"/> Middle School <input type="checkbox"/> Jr. High School <input checked="" type="checkbox"/> High School <input type="checkbox"/> 1 yr. College/Tech School <input type="checkbox"/> 2 yrs. College/Tech School <input type="checkbox"/> 3 yrs. College/Tech School <input type="checkbox"/> 4 yrs. College/Tech School <input type="checkbox"/> 1+ yrs. Post Graduate <input type="checkbox"/> Unknown
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## Next of Kin

Notified By: Dr. C. Woods Name: Sydney Plaza Relationship: Mother  
 Date Notified: 09/09/2023 Address: 31 Jane St. #16BC City: New York  
 Time Notified: 1:30 AM Phone Number: (917) 852-8800 State: New York Zip: 10014

## Incident Information

Last Seen Alive:	09/08/2023	11:55 PM	3700 OSCAR BLVD.	WASHINGTON, D.C.
Death Discovered:	09/09/2019	12:55 AM	3700 OSCAR BLVD.	WASHINGTON, D.C.

Death Date: 09/09/2023  
Death Time: Pronounced 1:05 AM  
Place of Death: 3700 Oscar Blvd. NW, Washington, D.C. 20057  
Place of Injury: 3700 Oscar Blvd. NW, Washington, D.C. 20057  
Found dead by: Matt Stone  
Last seen alive by: Jeff Stone  
Witness to injury, illness, or death: UNKNOWN

Injury Date: 09/08/2023  
Injury Time: Between 11:55 PM – 12:40 AM

Address: 3700 Oscar Blvd. NW, Washington, D.C. 20057  
Address: 3700 Oscar Blvd. NW, Washington, D.C. 20057

Weather: Normal Activity: In bed  
Position of body: Found lying on side  
Livor: N/A  Consistent with Position  
 Clothed  Partially Clothed  Unclothed  
Distinguishing Marks: Birthmark on back of left thigh  
Body Temperature: 88.7 F Body decomposition: N/A

**Cause of Death:**

1. Accidental – Inconclusive Pending Investigation  
(immediate cause)
2. CONDITION OF BODY, INCLUDING DEPRIVATION OF OXYGEN TO THE BRAIN, IS NOT SUGGESTIVE OF BUT NOT INCONSISTENT WITH DRUG OVERDOSE, POSSIBLE LINK TO GREEN DRINK CONTENTS UNDER FURTHER INVESTIGATION  
(due to or as a consequence of)
3. \_\_\_\_\_  
(due to or as a consequence of)

## Investigation

Evidence Collected: Ongoing Date: Ongoing  Toxicology Collected  
By: D.C.P.D Photos:  Yes  No  Blood  
EMS at scene  Admitted  Victim seen in ER  Attending notified: Dr. C. Woods  Urine  
Vitreous

Medical History: No prior history of illicit / recreational drug use

Medications: Birth Control Pill

- |  |   |  |
|--|---|--|
| 1. <input checked="" type="checkbox"/> Medical Records Requested | <input type="checkbox"/> Police Department Notified | <input type="checkbox"/> Death Certificate |
| 2. <input checked="" type="checkbox"/> Organ Donation            | Officer: _____                                      | Signed by: _____                           |
| 3. <input checked="" type="checkbox"/> Tissue Donation           | <input type="checkbox"/> Coroner's Inquest          |  |
| 4. <input checked="" type="checkbox"/> Cornea Donation           | <input type="checkbox"/> Autopsy:                   |  |
|  | Medical Examiner: _____                             |  |

Body Transported  Cremation  Cremation Permit Signed

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Poisoning:**

1. Street Recreational Drugs
2. Alcohol
3. Pharmaceuticals (Prescription)
4. Pharmaceuticals (Over the Counter)
5. Pharmaceuticals (Unknown)
6. Other (specific):
7. Gas or Vapor
8. Insecticide, Cleaning / Home Supplies
9. Carbon Monoxide (specify source):

1. Alcohol use suspected
2. Alcoholism Suspected
3. Regular Drug Use Suspected
4. Drug Suspected: \_\_\_\_\_
5. Drug Type: \_\_\_\_\_

# Weapons

**Firearm Type:**

1. Handgun
2. Handgun / Revolver
3. Handgun / Semi-auto
4. Rifle
5. Shotgun
6. Other (see \_\_\_\_\_)

1. **Firearm recovered**
2. **Casings recovered**

**Weapon (not firearm):**

1. Sharp instrument
2. Blunt instrument
3. Poisoning (drug and gas OD)
4. Hanging / Strangulation / Suffocation
5. Personal weapons (e.g., fist)
6. Fall (pushed / jumped)
7. Explosive
8. Drowning
9. Fire or Burns
10. Shaking
11. Motor Vehicle
12. Biological weapons
13. Other (specify):

**Other Firearm:** \_\_\_\_\_  
**Serial No.:** \_\_\_\_\_  
**Caliber:** \_\_\_\_\_  
**Gauge:** \_\_\_\_\_  
**Firearm Owner (or stolen):** \_\_\_\_\_  
**Firearm Storage (locked/loaded):** \_\_\_\_\_  
**Gun Shot Residue:** \_\_\_\_\_  
**Dominant Hand:** \_\_\_\_\_  
**Ammunition Type:** \_\_\_\_\_  
**Number of Shells:** \_\_\_\_\_

# Case History

**HOMICIDE:**

1. Brawl (mutual physical fight)
2. Drug related
3. Intimate Partner Left / Threatening
4. Other relationship (not intimate partner)
5. Intimate Partner Problems
6. Intervener assisting in crime
7. Associated with another crime (see narrative)
8. Argument over money or property
9. Gang related
10. Jealousy (lover's triangle)
11. Justifiable homicide
12. Other argument, abuse, conflict
13. Hate crime
14. Innocent bystander
15. Random violence
16. Terrorist attack

**SUICIDE:**

1. Life crisis within last 2 weeks
2. Anniversary of life crisis
3. Current depressed mood
4. Current mental health problems
5. Treatment for mental illness
6. Financial problems
7. Physical health problems
8. Job problems
9. Lack of employment
10. Recent diagnoses
11. Intimate partner problems
12. Intimate partner left / threatening
13. Other relationship problem (not IP)
14. School problems
15. Alcohol / Substance Problem
16. Legal problems
17. Recent suicide of relative / friend
18. Other death of relative / friend

**ACCIDENT:**

1. Fall
2. Hunting
3. Playing with gun
4. Loading / Unloading gun
5. Motor vehicle
6. Target shooting
7. Self-Defense shooting
8. Showing gun
9. Cleaning gun
10. Gun defect / Malfunction
11.  Celebratory firing
12. Other (see \_\_\_\_\_)

**NATURAL:**

- |   |  |
|---|--|
| <input type="checkbox"/> Nursing Home/Hospice | <input type="checkbox"/> Diabetes      |
| <input type="checkbox"/> SIDS/SUIDS           | <input type="checkbox"/> Heart Disease |
| <input type="checkbox"/> Smoker               |  |

**Motor Vehicle Crash**

1. Passenger
2. Driver
3. Pedestrian
4. Lap Belt Used
5. Airbag deployed
6. Hit Run

**NARRATIVE / COMMENTS:**

GREEN LIQUID IN VICTIM'S STOMACH. NO OTHER FOOD EVIDENT IN VICTIM.

TOXICOLOGY TEST ON SAMPLES OF GREEN LIQUID IN VICTIM'S STOMACH PENDING. TOXICOLOGY ALSO REQUESTED OF GREEN DRINK SAMPLES, GREEN POWDER SAMPLES, BLOOD SAMPLES, AND TISSUE SAMPLES OF VICTIM HAVE BEEN ORDERED AND ARE PENDING. DNA TESTS OF GLASSES HAS BEEN ORDERED AND PENDING.

C.O.D. ACCIDENTAL PENDING FURTHER INVESTIGATION BY D.C.P.D. AND CORONER.

## Personal Effects Inventory

- |               |                   |                |           |
|---------------|-------------------|----------------|-----------|
| 1. Bathrobe   | 13. Handkerchiefs | 1. Purse       | 1. Other: |
| 2. Belt       | 14. Hat           | 2. Raincoat    | _____     |
| 3. Billfold   | 15. Hose          | 3. Scarf       | _____     |
| 4. Blouse     | 16. Housecoat     | 4. Shirt       | _____     |
| 5. Bra        | 17. Jewelry       | 5. Shoes       | _____     |
| 6. Coat       | 18. Luggage       | 6. Shorts      | _____     |
| 7. Dress      | 19. Money         | 7. Slip        | _____     |
| 8. Eyeglasses | 20. Negligee      | 8. Skirt       | _____     |
| 9. Gasoline   | 21. Nightgown     | 9. Slippers    | _____     |
| 10. Garters   | 22. Overshoes     | 10. Socks      | _____     |
| 11. Girdle    | 23. Pajamas       | 11. Suspenders | _____     |
| 12. Gloves    | 24. Panties       | 12. Sweater    | _____     |

Billfold or purse contents:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Keys: \_\_\_\_\_

Money (list the number of each denomination) Total Amount \$ \_\_\_\_\_

Bills: \$100 _____	Coins .50 _____
\$50 _____	.25 _____
\$20 _____	.10 _____
\$10 _____	.05 _____
\$5 _____	.01 _____
\$1 _____	

Sub Total \_\_\_\_\_

1. Watch  
Make \_\_\_\_\_

2. ✓ Rings, Description  
1. Silver Band \_\_\_\_\_

2. \_\_\_\_\_  
3. \_\_\_\_\_

Beatrice Grey

Beatrice Grey  
Medical Examiner



PLAINTIFF'S  
EXHIBIT

4

## The Columbia Examiner

### SENATOR'S SON ARRESTED FOR MODEL'S DEATH AT SENATOR STONE'S PARTY

By Jessie Taylor

Columbia Examiner Reporter

This story was originally published on October 13, 2023

Follow us:  

Senator Stone's son Matt Stone was arrested yesterday in connection with model Daniella Plaza's death.

Matt Stone, the son of prominent D.C. Senator and known playboy Jeff Stone, was arrested and charged with one count of first-degree murder. Matt Stone was reportedly dating Plaza for a few weeks up until her death that September night and was also the one who called 911 when she was found unresponsive. He is scheduled to be arraigned this afternoon.

Police allege Matt Stone purposefully put fentanyl in Plaza's drink after finding her canoodling with his father, Senator Stone, after the party had ended late on Friday, September 8<sup>th</sup>. Seemingly acting out of deranged passion, Matt Stone, who was holding Ms. Plaza's drink for her after the party had ended, pulled out of his pocket a gram of fentanyl he had been planning on selling and poured some of it into her drink. He then gave the drink to her, and she drank it – causing her to die shortly after.

A toxicology report released five days ago by the Washington, D.C., coroner's office revealed that fentanyl was in her bloodstream at the time of her death. An autopsy conducted by the coroner also revealed remains of a green supplement drink in her system. Police said an unnamed witness reported leaving the bathroom when he saw Matt Stone put something into a glass of green liquid. The witness thought nothing of it at the time, assuming it was Matt's drink. The witness decided to come forward and tell police what he saw after witnessing Matt's "unusual behavior" at Plaza's funeral.

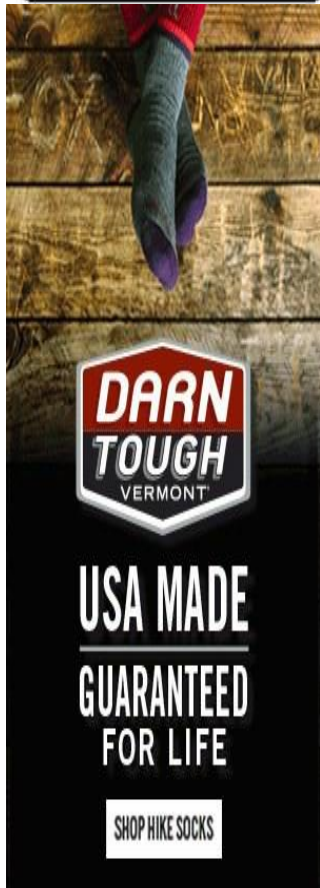
Police are saying: "We believe Matt Stone was upset and startled at what he walked in on and decided to take revenge on his girlfriend by slipping an incredibly dangerous drug into her drink, killing her. We believe he thought it would look like an accidental drug overdose. A key witness will testify to the events he saw leading up to the death."

Lawyers representing Matt Stone declined to comment on this article. Senator Stone and his staff have declined to comment as well. At this time, his political future is uncertain.

It was earlier reported that Plaza's death was caused by cocaine in her green supplement drink. However, a recent in-depth toxicology report revealed that Plaza had been drugged with fentanyl and had no cocaine in her system. Moreover, toxicology on the sample of powder taken from the supplement packets revealed that there was nothing sinister in any of the pre-mixed powders, ruling out wrongdoing on the part of the drink's creator.

According to police, another witness named David Bell saw Matt Stone and Daniella Plaza hanging out together the majority of the night at the party. A friend of Plaza said that Stone and Plaza had recently started a romantic relationship. Although Plaza had relocated her residence to New York City, she frequently visited friends in D.C. The witness reported that, throughout the night, Plaza and Stone seemed "cozy."

David Bell saw Senator Stone and Plaza kissing at the end of the night. Bell, a 27-year-old congressional intern, had walked into the Senator's kitchen to get a piece of cold pizza from the fridge when he spotted the two kissing at the other end of the large kitchen. He did not think the couple noticed him, although he could not be sure. Bell stated he thought



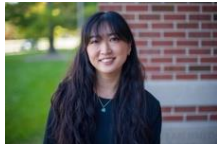


it seemed consensual, although he acknowledged the uneven power dynamic involved in Senator Stone's behavior and the alarming age difference. Nevertheless, Bell paid no attention to them, got his pizza, and walked out.

It was only a few moments later that the unnamed witness walked in from the bathroom at one end of the room and saw the Senator's son standing in the doorway on the other side of the kitchen putting something into the green drink. That witness did not think anything out of the ordinary was happening at the moment and did not second-guess that until Plaza's funeral.

At the funeral, witnesses describe Matt Stone as inconsolable and rambling. At one point, he started to blame his father for Plaza's death, witnesses said. They watched in horror as Matt Stone next became angry, flipped over a chair, and stormed out. It was then that the unnamed witness decided to take what he saw to the authorities.

After interrogating Matt Stone for just two hours, he admitted to putting fentanyl into Plaza's drink, but claimed he did not think it would kill her. Police say they have evidence to refute the latter part, but they are not releasing that evidence to the public yet.



Questions? Email  
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