

1 to the conclusion of the case to take the place of one of
2 the jurors, and then you will have to render a verdict. So
3 please pay strict attention at all times.

4 Before I end these preliminary instructions, a
5 word about schedule. I anticipate that we will start each
6 trial day here in the courtroom, and we're in courtroom 4B,
7 at 9:30 a.m. sharp. In order for that to happen, you will
8 need to assemble in the jury room here on the fourth floor
9 by 9:15 a.m. Please budget enough time to get to the
10 courthouse, pass through security, and get to the jury room
11 by 9:15 a.m.

12 We will take a 45 minute to one-hour lunch break
13 each day at approximately 12:30 or 12:45. We will also take
14 a short break in the morning and a short break in the
15 afternoon. We will end each day at approximately 5:30 p.m.
16 If there are any schedule changes we will inform you of
17 that.

18 I want to thank you in advance for your jury
19 service. With that, by way of introduction, we will now
20 hear from the prosecutor.

21 Do you have a microphone that you can use?

22 MR. FERN: I do.

23 THE COURT: You may proceed.

24 OPENING STATEMENT ON BEHALF OF THE GOVERNMENT

25 MR. FERN: For over a decade the defendants,

1 Nicole Daedone and Rachel Cherwitz, worked together to
2 coerce vulnerable woman to perform labor, including sexual
3 labor for their benefit. These women typically came from
4 traumatic backgrounds and they were looking to improve their
5 lives. The defendants lured these women into their supposed
6 community. A community called OneTaste.

7 OneTaste claimed to promote female empowerment.
8 Daedone was OneTaste's leader and Cherwitz was her top
9 deputy. After gaining their victim's trust, the defendants
10 set out on a criminal scheme to control these women.

11 The defendants drove their victims into debt. The
12 defendants isolated their victims from the world outside of
13 OneTaste and interfered with their family and romantic
14 relationships. The defendants tracked their victims inner
15 most fears. The defendants used psychological tactics to
16 control their victims. They gaslit them and deprived them
17 of sleep and privacy. They subjected them to sexual abuse.

18 The defendants did those things, and others, to
19 coerce their victims to perform unpaid or underpaid labor
20 for OneTaste. Working long hours, performing meaningless
21 tasks, sexually servicing OneTaste clients and OneTaste's
22 most prominent investor. These victims came to OneTaste
23 seeking personal growth. They left as shells of their
24 former selves.

25 What did the defendants get out of this? Power,

1 prestige, and money.

2 Before I continue, let me briefly reintroduce the
3 prosecution team. My name is Sean Fern. I'm an Assistant
4 U.S. Attorney in the Eastern District of New York. I'm
5 joined by my colleagues, Assistant U.S. Attorneys Kayla
6 Bensing, Kaitlin Farrell, and Nina Gupta. And by paralegal
7 specialists Liam McNett and Marlane Bosler. We're also
8 joined by Special Agents Tricia Quintero and Christine Meyer
9 of the Federal Bureau of Investigation. Together, it is our
10 privilege and duty to represent the United States.

11 Nicole Daedone founded and led OneTaste. As
12 you'll learn, she took preexisting practices from communes
13 and religions and rebranded them. OneTaste was selling
14 hands-on courses involving what Daedone called orgasmic
15 meditation, or OEM. OEM involved rubbing a woman's naked
16 genitals for 15 minutes. As you'll hear, Daedone
17 aggressively marketed OneTaste's genital rubbing course,
18 holding herself out as a OneTaste guru.

19 Rachel Cherwitz was OneTaste's head of sales and
20 Daedone's top lieutenant. For over a decade, the two of
21 them worked together to grow OneTaste on the backs of the
22 unpaid or underpaid labor of the vulnerable women they
23 manipulated to doing their bidding. Much of that labor
24 involved sexually serving OneTaste investors, as you'll see
25 throughout this trial. Who the defendants coerced victims

1 to sexually service changed over time as OneTaste needs for
2 money changed.

3 At its beginning, OneTaste relied on funding from
4 a wealthy tech investor. Daedone and others recruited
5 multiple women to sexually service him to keep him happy so
6 he would fund and continue funding OneTaste. After they
7 used up his money, the defendants switched to targeting
8 anyone whose money they could get, charging them tens of
9 thousands of dollars for what the defendants claimed to be
10 advanced programs, exclusive memberships, and so-called
11 personalized coaching sessions. That labor also included
12 selling courses, transcribing notes, cleaning, cooking,
13 setting up events, and attending to Daedone. You will hear
14 that these women were expected to cater to Daedone's every
15 whim.

16 Later on, when OneTaste started expanding and
17 facing outside scrutiny, the company made superficial
18 changes and introduced sham policies to mask Daedone and
19 Cherwitz's continued coercion and manipulation. But nothing
20 really changed.

21 Throughout this trial you'll hear from a series of
22 women who turned to OneTaste for healing but left that
23 community as remnants, broken remnants, of their former
24 selves. Collectively their time at OneTaste spans over a
25 decade. Some of these women knew each other, others did not

1 overlap at all. But the evidence will show a pattern in the
2 way these defendants treated their victims. A pattern that
3 clearly shows their plan to coerce their victims into
4 performing labor and services for the defendants' benefit.
5 It is a pattern that includes indoctrination, debt,
6 isolation, weaponizing past trauma and breaking down
7 personal boundaries. And it is a pattern the defendants
8 relied on to get their victims to work for little or no pay.
9 As you'll hear from the defendants' victims, the pattern
10 repeated itself again and again and again.

11 For instance, you'll hear from Dana. Dana will
12 tell you how she came to rely on OneTaste for her housing
13 and basic needs. She will tell you how she was
14 psychologically manipulated by the defendants. How she was
15 coerced into debt by their claims that the path to personal
16 growth ran through more and more expensive courses.

17 To payoff that debt, the defendants ordered
18 Dana to work. That work involved rubbing perspective
19 client's penises until they climaxed. And serving
20 OneTaste's primary investor by taking care of his garden,
21 making him breakfast, and performing sex acts on him.

22 You'll hear from Michelle. Michelle will tell you
23 how she came to live in a OneTaste residence. To pay her
24 for rent and OneTaste courses, the defendants ordered
25 Michelle to perform a variety of labor, including working in

1 the kitchen, and sexually servicing that same wealthy
2 OneTaste investor.

3 You'll hear from Becky. She joined OneTaste after
4 that investor's money ran out. Becky will tell you how she
5 was drawn to OneTaste's message of female empowerment. Like
6 Michelle and Dana, Becky worked off substantial debt brought
7 on by OneTaste by becoming a member of the OneTaste sales
8 team where she was directed to let perspective clients rub
9 her naked genitals. Becky will tell you about the
10 psychological manipulation defendants subjected her to and
11 about how Cherwitz sexually assaulted her in front of a room
12 full of people.

13 You'll of also hear from a number of other women.
14 Some of these women worked seven days a week from early in
15 the morning until late at night. They slept in shared beds.
16 They were expected to work through illness and to answer
17 calls and text messages immediately. They all provided a
18 variety of sexual services to support OneTaste. For this
19 work, they were paid very little or nothing at all.

20 These victims will explain the tactics used
21 against them that made them do this work. They worked
22 because they were taught that the way to enlightenment was
23 to obey the defendants' demands. They worked because they
24 were isolated from their friends, their families, and the
25 world outside the OneTaste. They worked because they were

1 taught there was no such thing as being a victim, and that
2 doing the things they found sexually disgusting was the path
3 to freedom. They worked because if they refused, they were
4 shunned, called viruses or addicts and sent to addiction
5 meetings designed to cause them to mistrust their own
6 intuition.

7 But they also worked because they were scared.
8 They were afraid that if they said no, they would be exiled
9 from their homes and the only community they had. They were
10 afraid if they said no, they would be spiritually ruined.
11 They were afraid that if they said no, they would be
12 verbally abused and humiliated. And they were afraid if
13 they said no, they would be financially devastated.

14 These victims lived in fear that if they refused
15 to do the work that the defendants demanded of them. They
16 would lose their entire source of support, community,
17 spirituality, and identity. Dana, Michelle, Becky, and
18 others will tell you how the defendants tactics broke them
19 down financially, physically, and psychologically until
20 OneTaste was the only thing the victims had.

21 Meanwhile, OneTaste expanded globally, including
22 to right here in Brooklyn. And Nicole Daedone and Rachel
23 Cherwitz profited from the crimes.

24 For their action, the defendants are charged with
25 the crime of forced labor conspiracy. While the judge will

1 provide you with specific legal instructions at the end of
2 the case, a conspiracy is just another word for agreement.
3 Forced labor is when someone gets another person to work for
4 them by making that other person fear serious harm if they
5 don't do the work. Serious harm can be any harm including
6 financial, reputational, physical, and psychological.

7 During this trial the Government will prove that
8 defendants committed this conspiracy beyond a reasonable
9 doubt, through witness testimony, documents, video,
10 photographs, and financial records.

11 First, you'll hear witness testimony. You will
12 hear from former OneTaste participants who will give you an
13 inside look into how this company operated. This will
14 include some of the women the defendants exploited, as well
15 as others that witnessed that abuse.

16 Second, you will see videos and photographs. You
17 will see the OneTaste residences the victims lived in. You
18 will see pictures of the victims. You will see where and
19 how the genital massaging practice the defendants based
20 their company on took place.

21 Third, you'll see documents. You'll see emails
22 and you'll see communications including text messages with
23 and about some of these victims. Messages that confirm the
24 victim's testimony describing how their experience in
25 OneTaste was damaging them financially, psychologically, and

1 otherwise. The types of work that they were doing and how
2 they were coerced into doing it. You'll see financial
3 records. You'll see the company's own records showing just
4 how much these victims paid for OneTaste courses. And
5 you'll hear how little the defendants paid their victims for
6 their work.

7 You'll see that as victims were coerced to
8 providing labor to OneTaste, Nicole Daedone and Rachel
9 Cherwitz benefited. As these victims lived in shared beds
10 and crowded spaces working long hours, Daedone used
11 OneTaste's funds to enjoy a lavish lifestyle.

12 Members of the jury, the evidence will come in
13 witness by witness. It won't always come in
14 chronologically, but you'll see how this evidence fits
15 together and how it proves that the defendants agreed to
16 force their victims to work for them under threat of serious
17 harm.

18 At the conclusion of this case we'll have an
19 opportunity to speak to you again and review all of this
20 evidence with you. At that time, we will ask you to return
21 the only verdict consistent with the evidence that you have
22 seen and that you have heard, guilty. Thank you.

23 THE COURT: Thank you, Mr. Fern.

24 Counsel for Ms. Cherwitz, do you wish to make an
25 opening statement?