

1 Q. I guess what I'd like to understand, you
2 know, is, is, again, just the steps that you
3 were taking to investigate the sexual
4 harassment complaint specifically. Did you
5 take notes regarding any of these
6 conversations that you had that you've
7 identified already with Ms. Kreisberg,
8 Ms. McQuaid, and Mr. Dahl?

9 A. Yeah, I believe I took notes on all of those.
10 You know, and I probably took -- I would
11 take -- I would take notes because I was
12 trying to come to a determination and, and,
13 you know, protect the organization and the
14 young woman. So yes, I would take notes, but
15 I do not know where those notes are at this
16 point in time.

17 Q. Okay. So you're not sure whether they exist
18 still or not? Is that accurate?

19 A. That is right.

20 Q. And if they do exist, you don't know where
21 they are; correct?

22 A. That would be very much correct.

23 Q. Okay. And did you draw, then -- is there --
24 let me ask you this: Is there anything else
25 that you've done that you haven't mentioned

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1 already, to investigate the sexual harassment
2 allegation?

3 A. You know, it seemed like I, you know,
4 probably tried to figure out if anybody else,
5 you know, knew something about this. You
6 know, I might have asked Charlie Thayer. I
7 think he was there that night. You know, but
8 I don't think any -- you know, there was --
9 it was -- it was a lot going on in that bar.

10 Q. Is there anybody else --

11 A. So I tried to find out, but I don't think
12 that there was a lot of, you know, people --
13 there was a lot of stuff going on, you know.
14 I just -- I, you know, I, I followed a few
15 leads on it I tried to do, but then Molly
16 resigned, you know, before I could -- I, I
17 couldn't do a full inquiry and -- you know,
18 into this case because I had two contractors
19 who had then basically resigned, and so at a
20 certain point as a organizational executive
21 director, you have a contract employee who
22 has resigned, who has filed a sexual -- you
23 know, a harassment case against another
24 contract employee who has resigned, and, you
25 know, you, you have tried to resolve this,

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1 but you didn't resolve it quick enough for
2 those contract employees, so they're gone.
3 And they're contract employees, you know.

4 Q. So let me follow up, I guess, a little bit
5 about that. Is it -- is it accurate to say
6 that Mr. Dahl ever resigned his position?

7 A. Well, he was on a leave of absence, and then
8 you know, after the determine -- the
9 determination was made, he was -- he was no
10 longer working for us. You know, my board
11 was certainly not gonna let me keep working
12 with Michael Dahl.

13 Q. Do you have any documents that reflect the
14 termination of that contract?

15 A. Well, I would -- you know, you could look at
16 his pay, pay stub from 2016, maybe, but, you
17 know, that would be White Earth Land Recovery
18 Project that he would still be on, not us.

19 Q. Well, let me take a step back, actually, and
20 just kind of, you know, thinking about the
21 sexual harassment allegation itself, at the
22 end of the investigation that you did into
23 that piece, did you draw any conclusions
24 whether sexual harassment had in fact
25 occurred?

1 A. You know, what I had is two people saying
2 different things occurred, but the policy of
3 Honor the Earth and my policy would be to, to
4 go with what the victim had said, you know,
5 and so the sexual harassment, you know,
6 would, would have occurred, then, because
7 that's what she had said; however, at the
8 point -- at that point she had already
9 resigned, and she was a contract employee,
10 and so her -- you know, was not -- was -- she
11 was done. She had already resigned. She
12 didn't wait until I was able to come to all
13 of the conclusions and discuss this with my
14 board. She resigned.

15 Q. So I want to understand, I guess, the role
16 that that played in the resolution of the
17 sexual harassment complaint. Because Ms.
18 Campbell had resigned, did that mean that the
19 investigation was concluded, or, or did you
20 actually draw a finding one way or the other?

21 A. I don't know that I have a -- you know, I
22 could look and see if I have a written
23 finding, but at a certain point it became
24 moot because neither of them, you know, were
25 with us, and, you know -- but my board, you

1 know, after reviewing the situation, was very
2 clear, and we had to instate a sexual
3 harassment policy, you know, and so in that
4 policy I'm directed to side with the victim,
5 you know. My problem was not -- you know,
6 I'm sure that, as an executive director and
7 as a woman, I'm absolutely sure that Michael
8 probably said something inappropriate to her.
9 No one heard it, but that's what she heard.
10 I didn't hear it, but, you know, that's what
11 she heard. And that is one thing, and then
12 there's a separate -- and it's a separate
13 thing as an executive director to see the
14 allegations and the -- and the image of a
15 story of a person smeared, you know, based on
16 not true allegations, and so I have, then, a
17 crisis that she had created, based on the,
18 the not-as-timely-as-she-would-have-liked
19 resolution of her sexual harassment case,
20 because she had decided to basically do a
21 character assassination on a community
22 member. And I had to -- you know, I was -- I
23 was watching that, and, you know, I think
24 that someone should, should have to -- the
25 crime that they have done is what they should

1 be convicted of. You know, if they didn't do
2 another crime -- I don't believe in Facebook
3 convictions. And I didn't -- and, you know,
4 as -- I was watching two contractors kind of
5 spin out. It was pretty damaging, you know,
6 for a lot of people, and I just felt like
7 that those questions and, you know, that and
8 how -- but more importantly in the case of,
9 you know, of making a false accusation
10 against someone publicly is really kind of an
11 egregious thing to do. That's problematic.
12 You know, but then in addition to that, you
13 know, you know, she caused me a lot of
14 crisis, and so at a certain point, I had to
15 figure out, you know, as Molly had tried to
16 defame myself and the organization to so many
17 funders and organizations, and she was no
18 longer present. You know, I, I, I was
19 spending my time now trying to deal with the
20 damage that she had done.

21 Q. So -- but as it relates, I mean, again, just
22 to the sexual harassment complaint, I want --
23 I just want -- I just want some clarity about
24 was there ever a finding made about whether
25 that happened and a decision on what that

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1 meant in terms of the disciplinary status of
2 either Ms. Campbell or Mr. Dahl?

3 A. I would have to look, you know. I would have
4 to look, but, you know, with the -- with the
5 resignation of a contract employee, you know,
6 I don't believe that I had a legal
7 responsibility for a contract employee's
8 post, post-resignation.

9 Q. Is it your position that once the victim of
10 harassment resigns, there is no longer a
11 problem?

12 A. No, that is not my position.

13 Q. And when did the contract with Mr. Dahl
14 terminate and why?

15 A. I believe that his contract was terminated
16 in, you know, February 5th or so, but I would
17 have to see. But I think that the
18 discussion, as you looked, looked in the
19 notes, he had already resigned his position,
20 essentially, earlier. Was that February 1st?
21 I forgot the date.

22 Q. And so was there ever communication to Mr.
23 Dahl indicating that his leave of absence was
24 permanent and he was not permitted to come
25 back?

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1 A. It was understood.

2 Q. And how would it have been understood?

3 A. I think I would tell him in person.

4 Q. Okay. So do you remember having a specific
5 conversation with him, telling him that his
6 contract was concluded?

7 A. Yes, I think -- I mean, no, I don't remember
8 exactly, but, you know, sometimes in our
9 community, you don't just send someone an
10 email that says, you know, you're done,
11 buddy. Some people do, but in the case of
12 Michael Dahl, who was, you know, at this
13 point, you know, a highly regarded spiritual
14 person in our community, performing funerals,
15 funerals mostly, you know, and, also, you
16 know, had other contracts that I, you know,
17 was not involved with and had -- was now
18 subject to this -- to this, you know,
19 Facebook lynch mob, I would have told him
20 personally, you know, "Look, buddy, Honor the
21 Earth can't work with you, you know. We
22 can't work with you because this is -- this
23 is now something that our organization can't
24 do. We can't work with contractors with this
25 much conflict, but I wish you the best."

1 That's what you do.

2 Q. Okay. But --

3

4 (Whereupon, there is simultaneous crosstalk.)

5

6 MS. LaDUKE: Because we're a
7 community. That's the difference. We're a
8 community.

9 BY MS. HALL:

10 Q. I guess I want to unpack that a little bit
11 because what I'm actually -- what I'm trying
12 to get to is what is -- what's the reason
13 that Mr. Dahl's contract was terminated? Was
14 his contract terminated because of the sexual
15 harassment allegation?

16 A. Yes, it was.

17 Q. Was there any other reason why his contract
18 was terminated?

19 A. No, he was -- he was terminated because of
20 the sexual harassment.

21 Q. Okay. And is this documented anywhere? Was
22 there a discussion with the board where they
23 directed this outcome, or was this your
24 decision?

25 A. I think that was my decision.

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1 Q. Did the board ever discuss that position and
2 draw any conclusions?

3 A. They might have.

4 Q. I, I want to turn to, I guess, also -- and I
5 may have some more questions about this, but
6 I'll, I'll, you know, come back to after I
7 reflect. But I wanted to ask because I've
8 been focusing on the sexual harassment
9 allegation at this point, and you've
10 mentioned already several of the things you
11 did to investigate the sexual assault
12 allegation, and I want to make sure we have
13 the complete list of all of those things that
14 you did. And so I just wanted to go through
15 some of the things that I heard you say
16 already and get you to confirm whether these
17 occurred. So you mentioned speaking to
18 Margaret Rousu, who was at the White Earth
19 Land Recovery Project, about these
20 allegations. Is that accurate?

21 A. Yes. She was actually at Niijii Radio.

22 Q. Okay. And, and why did you speak to her, and
23 what information did she share?

24 A. I spoke to her because she was who employed
25 Michael Dahl before I did. And she employed

1 him -- I mean, to the best of my knowledge,
2 but she employed him then for Ojibwe language
3 work on the radio station, and Margaret knew
4 her way around the community pretty well and
5 had done a lot of human services work, and so
6 it was Molly -- Maggie, that's what we called
7 her. Maggie's experience with human services
8 work led me to believe that she would know
9 about these kind of cases with ICW, Indian
10 Child Welfare, and so, you know, I don't
11 really know about these cases, and I didn't
12 know where to start, so I asked her, and I
13 figured she had done some due diligence in
14 the hiring of Michael Dahl or, you know, knew
15 more about it. And so I told her that I
16 heard these horrible allegations and that
17 they had been blasted out there on Facebook
18 by Lonna Hunter and by Bonnie Clairmont and
19 by -- and by Margaret, you know, but that
20 would be later on. But -- and, and widely,
21 and that, you know, I was like what's with
22 these -- what's the -- what's the -- what's
23 the story, you know, and, I don't know, it
24 probably started a little earlier than that,
25 but -- and she told me of this incident, and,

1 you know, I remember down to -- I think I
2 almost remember, you know -- but she told me
3 about the incident, and it was at camp, way
4 up at Leech Lake, and I believe that Michael
5 was like a older, you know, like a count -- I
6 mean, a camp counselor, and, and the
7 younger -- the younger guy was younger. You
8 know, he was like 17 years old. And so he
9 was -- he was -- he and Michael spent a lot
10 of time together and shared a lot of
11 experiences, and one of them seems to have
12 been this, this experience, you know. And
13 I'm not to judge, you know, these things.
14 And so that's what she said had occurred, and
15 that it is the mother who was apparently the
16 mother who had spoken up against Michael Dahl
17 in White Earth at the ceremony was the same
18 mother -- and I don't remember their names
19 anymore because I just kind of chose to not
20 remember all of that -- and she had spoken
21 up, but she had -- she had complained, you
22 know, about this to ICW, and then ICW had
23 done a full -- Indian Child Welfare, again --
24 had done a full and complete, like,
25 investigation of this or something like that,

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1 and in that, had determined that it was
2 consensual. And so it was actually
3 consensual. And so that is -- that is the
4 case that I got. And then I, I, I shook
5 every tree I could, including Fond du Lac. I
6 tracked down social service people, people
7 that my cousins knew, you know, stories. My
8 cousins were raised in the same community
9 that Michael Dahl was raised, you know. So I
10 tracked down every kind of story I could,
11 particularly if someone is accusing a man of
12 being a pedophile and raping boys, and I had
13 not heard of this, I don't want him around.
14 I have raised four sons. So I don't really
15 want Michael Dahl around my sons if that's
16 the case, but I didn't find that, you know.
17 He has a -- he has a special relationship,
18 you know, with a lot of people and, you know,
19 a lot of people might say that because he
20 hangs around a lot of young men, but I didn't
21 find that that was the case, and, you know,
22 the fact was is that Molly Campbell knew
23 Michael much better than I did, you know. I
24 knew him in different ways. I knew him in
25 ceremonial ways, but she lived with him, and

1 she hung out with all those boys that he
2 would have had every opportunity to be a
3 pedophile with, and never at one point during
4 the three years or two years that she lived
5 with Michael Dahl, did she say that. At no
6 point did I ever get a sense that Michael
7 Dahl was a pedophile, and so when that came
8 out publicly, you know, that's damaging to a
9 person's character. You know, all of this
10 stuff was very damaging, and, you know, so
11 this is -- these are -- these are complex
12 stories, but I had to investigate all of
13 that, you know, and, and I got down to the
14 boy, you know, the young man, and he had just
15 gotten out of prison. He had just gotten out
16 of prison, and I thought, you know what, that
17 young man doesn't really need to hear from
18 me. He just got out of prison. He doesn't
19 need to go walking down memory lane with a
20 complete damn stranger trying to track down
21 an incident of 15 years ago that he is
22 obviously, or maybe perhaps, is uncomfortable
23 about. He doesn't need to know that I know
24 about that incident, and I'm gonna respect
25 that young man, and in this case I'm gonna

1 protect that young man from having to have
2 that conversation with a bunch of people that
3 you don't need to know. So I'm just gonna go
4 walk away and say I'm gonna go with the
5 description of the -- of the Indian Child
6 Welfare caseworker who said that it was
7 consensual, and so I'm just gonna say that I
8 cannot find a single rape case. I can't find
9 a single case of a pedophile, you know. I
10 can find a couple guys that decided to hang
11 around one night, and I'm not gonna judge it.
12 And I'm, I'm just gonna leave it. And so
13 that's what's I found. And so, to me, these
14 are super complex times, but, you know, I
15 live in a different reality maybe than you
16 do. I want everybody to be okay. You know,
17 and let me just tell you something you
18 probably don't want to hear, but look at
19 this: I've got families that have
20 perpetrators and victims in them. That's my
21 life. That's my community I got. I got all
22 kind of things in my village and in my
23 family, and I got to figure out how to make
24 peace. And so this, you know, this sexual
25 harassment policy is very important to me,

1 but one of the reasons that we have requested
2 repeatedly for a reconciliation process is
3 that these policies do not actually reflect
4 the reality of the communities that we live
5 in or how we heal. I don't want Lonna Hunter
6 and all those ladies mad for the rest of
7 their damn lives at me. I don't want that,
8 you know, and I don't want these young people
9 to feel hurt, I don't want that either. What
10 I want is reconciliation and peace. I get
11 ridiculed in here for saying people have a
12 right to redemption. I've seen them, you
13 know, pull that out a few times, you know.
14 People have a right to redemption. Whatcha
15 gonna do in my community? You've got
16 intergenerational trauma associated with all
17 of this, and now I've got a nonnative person
18 with a sexual harassment suit that is five
19 years old that I'm still talking about. You
20 know, these are complex times. I'm doing my
21 best, man. I'm doing my best.

22 Q. So there are a number of different things
23 that I wanted to follow up on related to
24 that. I guess I want to start maybe with the
25 most finer or the easiest. What is your

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1 understanding of when Ms. Campbell,
2 Ms. McQuaid, and Mr. Dahl began renting an
3 apartment together?

4 A. Probably after that 2014 ride.

5 Q. Okay. And so at that point, I think you, you
6 said earlier when you were talking, that they
7 had lived together for several years, but, in
8 fact, it was --

9 A. It was several months. It was about six or
10 eight months, you know, because they just got
11 into that place, and it was kind of lucky, it
12 was hard -- you know, it was -- it was a
13 sweet little place they all lived in.

14 Q. I mean, would it be accurate to say it was
15 roughly between October and December of 2014?

16 A. I think it was longer than that because it
17 was in the summer I remember being up there.
18 But, you know, you could be right. It could
19 have been only three months that they lived
20 together. They, you know, they hung out
21 quite a bit prior to that.

22 Q. So let me ask you again about -- or sorry.
23 Let me turn, next, to some of the other
24 things that you raised, and you mentioned --
25 and, again, I'm trying to get a complete list

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1 of the things that you did to investigate the
2 sexual assault allegations. You mentioned
3 speaking with Margaret Rousu, and then it
4 wasn't clear to me. I want to be crystal
5 clear because you've mentioned an Indian
6 Child Welfare case. Is that accurate?

7 A. I think that's what it was, but I don't
8 recall exactly.

9 Q. Okay. How did you learn that there had been
10 such a case, like an official case? How did
11 you learn that information?

12 A. I believe I learned it because Maggie Rousu
13 worked at Indian Child Welfare previously,
14 and so she was familiar. ICW worked this
15 track all kind of kids through all kind of
16 situations over the years. And then that is
17 how that started, but then she employed him,
18 and she employed him knowing that there had
19 been this case, and she was required by her
20 board at Nijjii Radio to make sure that she
21 had due diligence, and so I asked her because
22 she employed him.

23 Q. Okay, and so when you spoke to Ms. Rousu, it
24 was because she'd employed him and you wanted
25 to know if she knew anything? Is that

1 accurate?

2 A. Yes, that, and then I also think that I knew
3 that she was social services. As I said, I'm
4 really not familiar with social services --
5 like a lot of social services agencies.

6 Q. Okay. And so when she spoke to you, did she
7 tell you there was an official child
8 protective services case involving Mr. Dahl
9 and this young man? Did she give you that
10 specific information?

11 A. She said that -- she said that there had been
12 a case.

13 Q. Okay.

14 A. That there had been -- that there had been a
15 complaint and that it was fully investigated
16 and determined to be consensual.

17 Q. And did she explain to you how she learned
18 that information, that there had been a
19 determination that it was consensual?

20 A. I -- you know, I feel like I'm getting into a
21 place where I'm violating other people's
22 confidentiality, and so I don't really think
23 that I'm gonna go down that path with you.

24 Q. Okay. You are being deposed under oath, and
25 you are actually required to answer my

1 questions. So unless your attorney is gonna
2 instruct you not to answer, this is critical
3 information to the case. So I really need to
4 get the details of how -- what information
5 you learned and how. So, you know, just so
6 the record is clear on this topic, my
7 question to you is what did Ms. Rousu tell
8 you about the Indian Child Welfare services
9 or any kind of child protective services
10 case? Did she tell you that there was a
11 finding?

12 A. Okay. So this is my concern is, is that,
13 one, I just said I don't want anybody to ever
14 talk to that young man, and so I don't know
15 what you're gonna try to do with this, right.
16 Because I don't -- I don't -- you know,
17 that's, that's one thing -- but I don't even
18 know if I remember his name. Second, I don't
19 know if she violated any confidentiality by
20 telling me that, right, so I'm getting into
21 this place where I don't really want to get
22 people in trouble. But, you know -- so is
23 this a closed deposition now or now it's a
24 public record?

25 Q. I mean, we are in a court case that is a

1 matter of public record, absolutely, but that
2 does not mean that you are permitted to not
3 answer my questions. So I just want -- I
4 want the record to be clear. Are you
5 refusing to answer, essentially?

6 A. No, I'm not. I was -- I was trying to look
7 out for some people, dear. You know, I'm not
8 refusing to answer. I'm not, you know -- so
9 this is -- this is what I would say is I
10 don't remember. I actually don't recall the
11 full sequence of things, but I remembered I
12 talked to Maggie because she seemed to know
13 these things, and then I believe that Maggie
14 was previously a caseworker at Indian Child
15 Welfare, and that, you know, some case, maybe
16 with this young man, had come up, and she
17 looked into the record. You know, maybe that
18 was it, or maybe it was also just also when
19 she refused Michael Dahl because she told me
20 specifically, you know -- basically, when,
21 when the record -- you know, when it had
22 occurred. And at this point I also talked to
23 Michael Dahl. Having heard the story, I
24 asked him exactly what the incident was. So
25 I had two sources. I had Michael Dahl

1 telling me his firsthand account of what
2 happened, you know, which was -- which is
3 something that happens between young men
4 sometimes at camp, you know, that's what he
5 told me. Pretty, you know, pretty much
6 straightforward. And then I had this, this
7 question of if that was illegal or not, what
8 he had done. And that would be a case for
9 Indian Child Welfare. And so in this case
10 what I did is I, you know, I asked Maggie if
11 she knew of if there was any case, and she
12 said yes, there was this case, there was this
13 complaint brought by the mother and that
14 complaint was about her child who was then 16
15 or 17, like I said, he was not 15. He was
16 like 16 or 17, and Michael Dahl was 23. And
17 they were at this camp and this incident
18 occurred and the mother, you know, complained
19 about the incident, and there was a review of
20 Michael Dahl, and in that review it was
21 determined that this was a consensual
22 occurrence, and that's all it was, which was
23 exactly what Michael Dahl had said. And so
24 how you get from a consensual sex between two
25 men to a rape is something that I don't --

1 you know, I don't really understand that.
2 But, to me, it is a different thing because
3 consent is the key and the operative word if
4 it is a rape or not, you know. So this was
5 a, a consent that occurred, and then -- and
6 then they determined that, you know, it
7 was -- it was no point to -- there was no
8 further need to discuss it. So that's where
9 I got to. And so what I had is, at this
10 point, you know, that's as far as I got in
11 the investigation. I, I could not find that
12 Michael Dahl was a pedophile or a rapist.
13 And I found that to be -- you know, I just
14 spent -- I spent 61 hours because I kept
15 talking to my board chair, and he's, he's an
16 investigative reporter, so he's like go look
17 at this -- oh, that's who I talked to. Paul
18 DeMain. Oh, go look at this, just shake
19 every tree and every bush, you know, and so
20 that's what I did. 61 hours. My time as an
21 executive director, you know, trying to solve
22 this -- these, these, these allegations and,
23 you know, what had occurred. And, you know,
24 I, I did not find that there was any evidence
25 of that. And that was -- that really, you

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1 know -- I -- that's what I found. I didn't
2 find any evidence.

3 Q. Okay. I, I want to make sure that again I,
4 I -- and I apologize for belaboring this, but
5 this is critical information to the case, and
6 so I need to make sure that the record is
7 clear about what occurred here. My
8 understanding of what you've just said is
9 that you got this information about this
10 Indian Child Welfare case -- or you're not
11 sure exactly what type of case it is, but
12 some sort of official investigation of this
13 matter, you got that information verbally
14 from Ms. Rousu. Is that accurate?

15 A. That is right.

16 Q. Okay. Did you see -- did she provide you
17 with any documentation reflecting what she
18 told you?

19 A. No, she did not. And in addition to that,
20 you know, it is quite possible that I went
21 further down that tree. I remember what
22 Maggie said. You know, I probably talked --
23 I might have talked to someone else. I don't
24 know. Because it seemed like I went further
25 down that tree because I had his name -- I

1 had the kid's name, but I don't remember it.
2 But I had his name. And I -- and I -- and
3 I -- and I checked to find out where he was
4 and I found out that he was just getting out
5 of jail. So I went pretty far down the tree,
6 and then at a certain point just, you know,
7 at a certain point I just decided to protect
8 that young man, because I didn't feel like
9 his history needed to be on, on parade for
10 anybody.

11 Q. Okay. And so you've said already that you
12 did not speak to the young man in question.

13 A. Mm-hmm.

14 Q. Did you speak to his foster mother? The one
15 who made the accusation originally.

16 A. You know, I think I tried to speak to the
17 foster mother one time to find out what had
18 happened, but I don't really remember much
19 about that.

20 Q. And when you say you "tried to" speak to her,
21 is it your recollection that you were unable
22 to actually speak to her?

23 A. You know, I feel like I spoke to her, but I
24 don't remember it being like a very, you
25 know, significant -- I don't remember. I'm

1 just being honest with you. At this point, I
2 just don't even remember that. But I
3 remember, you know, I remember that I figured
4 out who she was, and I, I talked to some
5 other women at, at that event, and that's
6 how -- so I went that far down the tree, and
7 then I figured out who the young man was, and
8 I figured out -- you know, I think I did talk
9 to her. I think I remember giving her
10 something to talk to me about it, you know,
11 like some tobacco or something. That's how
12 we do it. But, you know, I don't really
13 remember much after that, you know. This was
14 a long time ago, and that was even longer
15 ago, and I didn't even know those people
16 then.

17 Q. Okay.

18 A. That was 20 years ago now. Or 30. Yeah,
19 30 years ago.

20 Q. And so, you know, we've identified -- excuse
21 me -- that you spoke to Ms. Rousu, you spoke
22 to Mr. Dahl, you don't recall whether you
23 were actually able to speak to the mom. Is
24 that accurate so far?

25 A. Yeah, you can say that.

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1 I'm walking to get something to drink,
2 excuse me.

3 Q. Okay. Is there anybody else that you
4 remember speaking to when you were
5 investigating this incident?

6 A. Well, about that incident, no.

7 Q. Okay --

8 A. Excuse me.

9 Q. No, I'm sorry --

10 A. About that incident, no, but about the Fond
11 du Lac incident, yes. I remember chasing
12 down some stuff on Fond du Lac, and I
13 remember I didn't, you know, I didn't find
14 the allegations that were, at that point,
15 forwarded to me about his Fond du Lac
16 incident, and I also didn't find -- and, I
17 also found that the Fond du Lac Tribal
18 College continued to employ him. And so that
19 made me not be sure about the evidence that
20 was presented in terms of Fond du Lac.

21 Q. Okay.

22 A. And then, you know -- and, and so that's
23 where I got to, but then, you know, at a
24 certain point, you just -- you just don't
25 want to get to -- you know, these are

1 contract employees. You know, these are
2 contractors. You know, you don't want to
3 spend 60 hours when you're trying to pay them
4 to do work. You don't want to use your pay
5 to try to figure out their stuff.

6 Q. And so when you mentioned the Fond du Lac
7 incident, can you tell us what that is. What
8 are you referring to?

9 A. No, I mean, because I think they were talking
10 about how they had a ban on him at Fond du
11 Lac, some program, and I think I tracked down
12 the program, and I didn't find that to be
13 true.

14 Q. Okay. Do you recall who you spoke to about
15 that?

16 A. No, I do not.

17 Q. But it was somebody involved with the --

18 A. Yeah, it was someone involved in the programs
19 at Fond du Lac, but I don't remember who it
20 was. No, I'm, I'm, I'm sorry, I don't
21 remember that.

22 Q. Okay. So you spoke to somebody connected
23 with the Fond du Lac college or, or whatever
24 the organization was there that employed
25 Mr. Dahl --

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1 A. Yeah.

2 Q. -- and found that they continue to employ
3 him. Is that accurate?

4 A. Yes, that's true. And I knew he was under
5 employ at Fond du Lac, and I believe he still
6 is under employment at Fond du Lac.

7 Q. Okay. So earlier, though, you mentioned
8 incidents. Were there, there rumors of
9 things that had occurred at Fond du Lac?

10 A. Well, your -- it is in her writing. I had
11 never heard anything about it. You know, I
12 knew nothing about it and then there was
13 these allegations that were at Fond du Lac,
14 and then this allegation that was, you know,
15 up at, you know, up at, at Leech Lake.

16 Q. Okay. So -- but just speaking specifically
17 about Fond du Lac, when you spoke to the
18 person there, whoever you spoke to, did they
19 tell you that there had been some, some
20 incidents that they investigated and found to
21 be unfounded, or, or, or did they say no,
22 there's nothing? I mean, what specifically
23 did they tell you?

24 A. No, because I think what I had was a
25 statement that there was this policy in

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1 effect at a program at Fond du Lac which
2 barred him from operation there, which is
3 what you had shown us earlier in a
4 deposition -- or, you know, in this, this
5 deposition time, referral to some kind of a
6 policy. We don't hire Michael Dahl here,
7 that policy. And so I believe I was trying
8 to investigate if that policy actually
9 existed, and they didn't have that policy.
10 That policy did not exist, you know, in the
11 program that they said it was, to the best of
12 my knowledge.

13 Q. Okay.

14 A. That's what I was looking at. I didn't go
15 and say, "Do you know that Michael Dahl is a
16 pedophile, or did you hear that he was a
17 pedophile?" Because that would be something
18 that I would not say to people I don't know
19 about an incident that I don't know. That
20 would be really inappropriate.

21 Q. So to the best of your recollection, your
22 inquiry was simply -- do you still employ or
23 still, you know, willing to employ Mr. Dahl;
24 correct?

25 A. I think it was a little bit -- yeah, I think

1 something like that, maybe a little bit more
2 poignant, you know.

3 Q. What do you mean by --

4

5 (Whereupon, there is simultaneous crosstalk.)

6

7 MS. LaDUKE: Do you guys have a
8 policy or anything, you know. I mean, I
9 don't remember exactly how I said it, because
10 you know, in the case when you have a rumor
11 about somebody that you're not sure is
12 substantial or not, it's not really my
13 position to diminish or, or defame them, you
14 know. You know, you have to sound a little
15 more even, you know. Hey, you guys work --
16 you know, it's like how you talk. You know,
17 which you may not understand because you're
18 not from our community, just as a matter of
19 fact, but, you know, you've got to explain,
20 it's kind of like a sideways how you ask
21 things and then you kind of go, you know, you
22 got a policy, but you don't just -- you don't
23 just come in and say, "Hey," you know, "was
24 Michael Dahl a pedophile over here?"
25 Probably not, you know.

1 BY MS. HALL:

2 Q. Okay. So -- okay. And so other than, you
3 know, that inquiry about whether there was
4 any policy prohibiting them from working with
5 Mr. Dahl and the, the -- what we previously
6 discussed about speaking with Ms. Rousu, Mr.
7 Dahl himself, and, and possibly the mother,
8 what other steps did you take to investigate
9 the sexual assault allegation?

10 A. I think that that might have been the extent
11 of it. You know, I might have reviewed --
12 you know, I reviewed a lot of material that
13 Lonna Hunter and Bonnie Clairmont had. You
14 know, I was familiar a little bit with their
15 work because certainly, you know, spiritual
16 exploitation or sexual exploitation, you
17 know, that is -- that is all not acceptable,
18 you know. So I reviewed some of their
19 material, you know. But as I -- as I said,
20 this was -- you know, I mean, I, I -- yeah.
21 I, I reviewed some more of it, but, like I
22 said, it was 61 hours by the time I was done,
23 and then by the time we're talking about
24 this, you know, being done, Michael Dahl
25 doesn't work for us and, and Molly Campbell's

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1 in New York.

2 MS. HALL: Okay. I do want to
3 take a short break --

4 Yes -- sorry -- to review the Zoom file.
5 I got your note.

6 I would also like a short break to review
7 my notes to see if there are other questions
8 that I want to ask. I know that it's quite
9 late in the day, so if we could maybe just
10 take a five-minute break, is that good with
11 everybody?

12 MS. LaDUKE: Yeah, that'd be good,
13 because I've actually got some other things
14 to move on to. And I know I'm legally
15 required to be here, but I would really love
16 to finish this. So, please be, be -- I will
17 do my best to be more brief in my response if
18 I feel it is appropriate. Thank you.

19 MS. HALL: Okay. Let's be back
20 here at 4:50 and go off the record now.
21 Thank you.

22 MR. SMITH: Very good. We are
23 going off the record, and the time is
24 4:45 P.M.

25

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1 (Whereupon, a break is taken.)

2

3 MR. SMITH: We are back on the
4 record, and the time is 4:53 P.M.

5 MS. HALL: All right. Thank you.

6 BY MS. HALL:

7 Q. Ms. LaDuke, I know it's been a very, very
8 long day and I appreciate your patience
9 throughout this lengthy process. I do have a
10 few more questions but not many and then we
11 can conclude for the day.

12 I did want to ask you: Were you aware in
13 this matter that a subpoena was served on the
14 White Earth Land Recovery Project recently?
15 Had you heard that?

16 A. No.

17 Q. Okay. And have you spoke with Ms. Rousu
18 recently?

19 A. Yes, I spoke to her a few days ago.

20 Q. Okay. Did you discuss anything about this
21 case recently?

22 A. Nope.

23 Q. Okay. Did she mention to you that, that she
24 received a subpoena?

25 A. No, she did not.