

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(MIAMI DIVISION)**

**JANE DOE,**

**CASE NO: 1:25-cv-20757-JB/Torres**

Plaintiff,

v.

**STEVEN K. BONNELL II,**

Defendant.

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**DECLARATION OF JOAN S. PETERS PURSUANT TO 28 U.S.C. § 1746**

I, Joan S. Peters, declare as follows:

1. I am counsel of record for Plaintiff in this action, admitted *pro hac vice*. I submit this Declaration in support of Plaintiff's Reply in Support of her Motion for Sanctions under Federal Rule of Civil Procedure 37. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently to them.

2. On June 3, 2026, Defendant Steven K. Bonnell II, who streams publicly under the name "Destiny," participated in a live-streamed online conversation with three other individuals who stream under the names "Whick" (also "WhickTV"), "AidenUnderground," and "Stardust."

3. Whick hosted the conversation. During the stream, Defendant transmitted to Whick images of Defendant's own Discord message thread with the user known as "SoloTinyLeaks" ("Solo"). As host, Whick displayed those images on the broadcast for the participants and the viewing public, and Defendant directed which images Whick should display.

4. The conversation was broadcast simultaneously by Defendant, Whick, and AidenUnderground, each from that person's own vantage point, so that the images of Defendant's thread with Solo are visible in each of their respective recordings.

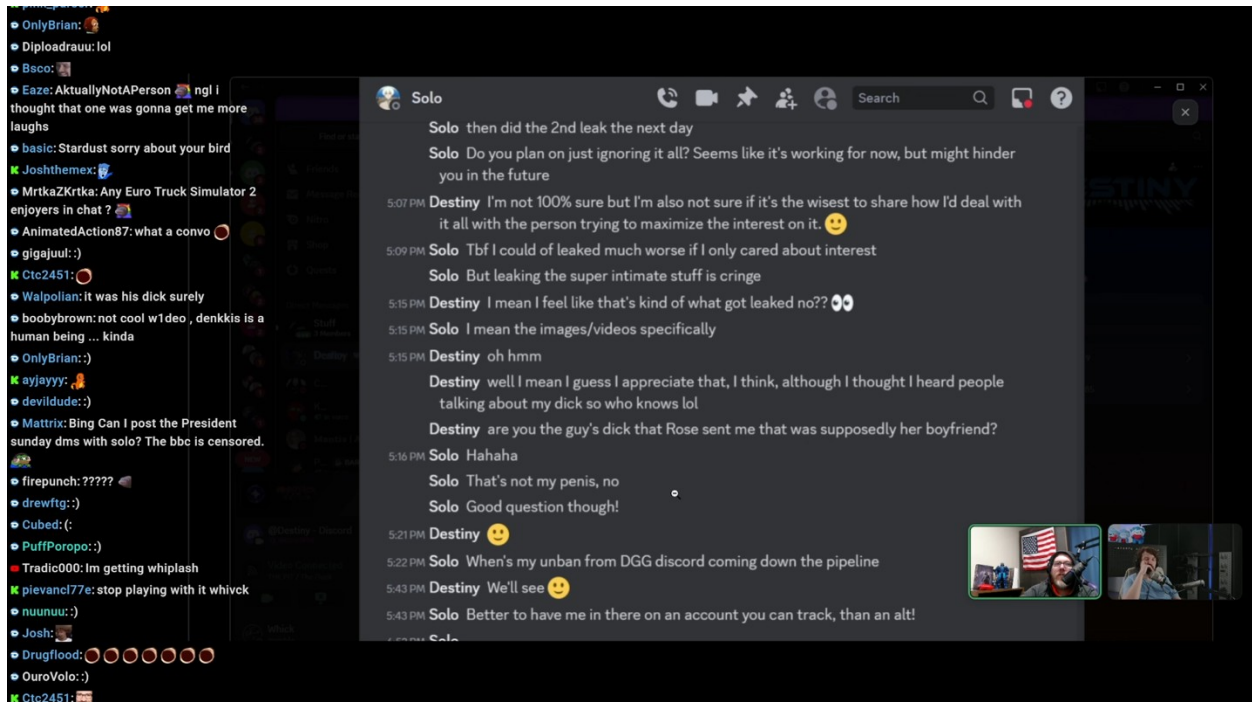
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5. I have personally viewed the following recording of the June 3, 2026 livestream: Defendant's ("Destiny's") own recording, on his Kick channel, at <https://kick.com/destiny/videos/flleafde6-76ec-4d84-86c5-238bec5cdf9>, beginning at approximately 5:57:47.

6. The video recording displays a chat thread between Solo and Destiny in which they are discussing the recent leaks by Solo. The first time stamp in the displayed chat thread is at 5:07 p.m. and the last time stamp is at 7:19 p.m, with multiple messages in-between. There is no date stamp on the threads however the content is clear that the communications occurred sometime after the first leaks in November 2024. These displayed chat threads have never been publicly posted prior to this June 3, 2026 livestream. Below is a true and accurate screenshot of the recording showing one of the displayed chat threads.



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7. The displayed chat threads are directly responsive to Plaintiff's First Request for Production: "[a]ll documents and/or all communications you have had with ...b) the individual with the screen name SoloTinyLeaks...". See ECF 263-11, ¶ 15.

8. Defendant did not produce any of his communications with Solo in discovery in this action, including the ones displayed in the June 3, 2026 livestream. See ECF 263, ¶ 20.

9. Plaintiff's counsel sent a deficiency letter to Defendant's counsel regarding Defendant's failure to produce, *inter alia*, the Solo communications. ECF 263-8, at 5. Defendant's letter in response, dated November 12, 2025, responded in relevant part: "Regarding Bonnell's communications with Solo, Bonnell has no responsive documents in his possession, custody or control. Solo seemingly deleted his Discord account shortly after leaking Bonnell's private information on Kiwi Farms." See **Exhibit A** attached hereto, a true and correct copy of the November 12, 2025 Response Letter from Andrew Brettler.

10. Defendant's display of these communications on June 3, 2026 demonstrates that the communications exist and remain within his possession and control, directly contradicting Mr. Brettler's November 12, 2025 letter.

11. I have personally viewed a YouTube video excerpt of an October 2025 livestream by Defendant ([https://www.youtube.com/watch?v=gi\\_IteUmjhA&t=4172s](https://www.youtube.com/watch?v=gi_IteUmjhA&t=4172s)) in which he discusses Jesus Peña's Declaration dated October 3, 2025, submitted in support of Plaintiff's Opposition to Motion to Dismiss, ECF 139-1. Defendant posts page 8, paragraph 16 of the declaration which pertains to Defendant's evidence mismanagement and failure to collect cryptographic hash values, and at time stamp 1:10:07 states that, "This is such a stupid argument. It makes no sense." At time stamp 1:10:57, he states, "This whole cryptographic hash argument is so stupid because if I was

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going to doctor anything, I could just doctor a thing and then give them a hash and it wouldn't prove anything. It's so stupid." These are true and correct quotes from the livestream video.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 8, 2026.

*s/ Joan Schlump Peters*  
Joan Schlump Peters