

EXHIBIT 1
(FILE UNDER SEAL)

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HIGHLY CONFIDENTIAL AEO
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

[REDACTED],

Plaintiff,

v.

Case No:

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----x

HIGHLY CONFIDENTIAL
DEPOSITION OF [REDACTED]
NEW YORK, NEW YORK
Friday, February 17, 2017

Reported by:
JEREMY RICHMAN
JOB NO: 300491

MAGNA LEGAL SERVICES
320 West 37th Street, 12th Floor
New York, New York 10018
(866) 624-6221

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4 February 17, 2017

5 9:00 a.m.

6

7 DEPOSITION of [REDACTED], held

8 at the offices of Boies, Schiller & Flexner,

9 575 Lexington Avenue, New York, New York,

10 before JEREMY RICHMAN, a Shorthand Reporter and

11 Notary Public of the State of New York.

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2 APPEARANCES:

3

4 BOIES, SCHILLER & FLEXNER, LLP

5 Attorneys for plaintiff

6 401 East Las Olas Boulevard, Suite 1200

7 Fort Lauderdale, FL 33301-2211

8 BY: SIGRID [REDACTED] MCCAWLEY, ESQ.

9 (smccawley@bsfllp.com)

10

11

12 HADDON, [REDACTED] AND [REDACTED], P.C

13 Attorneys for Defendant

14 150 East 10th Avenue

15 Denver, CO 80230

16 BY: LAURA A. MENNINGER, ESQ.

17 JEFFREY S. PAGLIUCA, ESQ.

18 (lmenninger@hmflaw.com)

19 (jpagliuca@hmflaw.com)

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2 APPEARANCES (Continued):

3

4 J. STANLEY POTTINGER, PLLC

5 Attorneys for the witness

6 49 Twin Lakes Road, Suite 100

7 South Salem, NY 10590

8 BY: J. STANLEY POTTINGER, ESQ.

9 (stanpottinger@aol.com)

10

11

12 MINTZ & GOLD, LLP

13 Attorneys for the witness

14 600 Third Avenue

15 New York, NY 10016

16 BY: PETER GUIRGUIS, ESQ.

17 (guirguis@mintzandgold.com)

18

19

20 ALSO PRESENT:

21 GHISLAINE MAXWELL, via teleconference

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2 IT IS HEREBY STIPULATED AND AGREED
3 by and between the attorneys for the respective
4 parties herein, that filing and sealing be and
5 the same are hereby waived.

6 IT IS FURTHER STIPULATED AND AGREED
7 that all objections, except as to form of the
8 question, shall be reserved to the time of the
9 trial.

10 IT IS FURTHER STIPULATED AND AGREED
11 that the within deposition may be sworn to and
12 signed before any officer authorized to
13 administer an oath, with the same force and
14 effect as if signed and sworn to before the
15 Court.

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2 MS. MENNINGER: If we could
3 have counsel enter their
4 appearances for the record,
5 please.

6 MR. GUIRGUIS: Sure. My
7 name is Peter Guirguis. I'm
8 appearing on behalf of the
9 witness today.

10 MS. MCCAWLEY: Sigrid
11 McCawley on behalf of [REDACTED]
12 [REDACTED], the plaintiff in the
13 action.

14 MR. POTTINGER: Stan
15 Pottinger on behalf of the
16 witness.

17 MS. MENNINGER: Laura
18 Menninger and Jeffrey Pagliuca on
19 behalf of Ms. Maxwell, who is
20 appearing by telephone.

21 [REDACTED], having been
22 called as a witness, having first
23 been duly sworn by a Notary
24 Public (Jeremy Richman) of the
25 State of New York, was examined

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2 and testified as follows:

3 EXAMINATION BY

4 MS. MENNINGER:

5 Q. Good morning, [REDACTED].

6 A. Good morning.

7 Q. Can you please give us your
8 full name.

9 A. [REDACTED].

10 Q. And what is your birth date?

11 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

12 Q. And what is your current
13 address?

14 MR. GUIRGUIS: I'm going to
15 object to current address.

16 Q. You can answer.

17 MR. GUIRGUIS: You can give
18 your last permanent address.

19 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

20 (An off-the-record
21 discussion was held.)

22 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

24 Q. And what does that mean,
25 that's your last permanent address?

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2 A. I reside there.

3 Q. Do you rent an apartment?

4 A. My partner does.

5 Q. Who is your partner?

6 MR. GUIRGUIS: Objection.

7 Q. Who is your partner?

8 THE WITNESS: Do I have to
9 answer that?

10 MR. GUIRGUIS: Yes.

11 A. [REDACTED]

12 Q. I'm sorry?

13 A. [REDACTED]

14 Q. How do you spell that last
15 name?

16 A. [REDACTED]

17 Q. And how long has [REDACTED] been
18 your partner?

19 MR. GUIRGUIS: I'm going to
20 object. I'm not sure what the
21 relevance of this is or where
22 you're going with this.

23 Q. How long has [REDACTED] been your
24 partner?

25 THE WITNESS: Sorry, can I

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2 just ask a question? I would
3 like to just clarify. When you
4 say objection, does that mean I
5 actually have to answer the
6 question? Because that's
7 irrelevant.

8 MR. GUIRGUIS: Right.
9 Unless I'm telling you not to
10 answer, you need to answer.

11 THE WITNESS: So I don't
12 need to answer?

13 MR. GUIRGUIS: No, you do
14 need to answer this.

15 A. Okay. We've been together
16 almost a year.

17 Q. And what is your current
18 occupation?

19 A. I'm a writer.

20 Q. And what do you write?

21 A. Just stuff, you know? Just
22 about factual stuff. You know, just a
23 bit of this, bit of that.

24 Q. Have you been paid for any
25 of your writing?

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2 A. No. It's more of a hobby,
3 really.

4 Q. Are you employed?

5 A. Nope.

6 Q. Do you have any source of
7 income?

8 A. My partner --

9 MR. GUIRGUIS: I'm going to
10 object to that. Income is out.
11 You don't have to answer
12 that.

13 Q. Do you have any source of
14 income?

15 MR. GUIRGUIS: I just
16 objected to that. You don't have
17 to answer.

18 MS. MENNINGER: Is there a
19 privilege you're asserting?

20 MR. GUIRGUIS: I'm not sure
21 what the relevance is, and I'm
22 not going to allow --

23 MS. MENNINGER: Do you
24 believe that relevance is a
25 proper objection during a

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2 deposition?

3 MR. GUIRGUIS: I believe
4 that if you go far afield with
5 this witness, that the judge is
6 not going to appreciate it, and
7 that I'm not going to just sit
8 here and be a potted plant and
9 allow her to answer any questions
10 on any subject that you see fit.

11 MS. MENNINGER: On
12 relevance? You're instructing
13 her not to answer on a relevance
14 objection? Is that what you're
15 saying?

16 MR. GUIRGUIS: I just
17 objected.

18 MS. MCCAWLEY: I'm going to
19 object on behalf of the
20 plaintiff, [REDACTED], to
21 the extent that you're requesting
22 from a nonparty financial
23 information, which is not allowed
24 under New York law.

25 MS. MENNINGER: I have asked

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2 her whether she has any source of
3 income, and you're going to
4 object --

5 MS. MCCAWLEY: Yes.

6 MS. MENNINGER: -- and
7 instruct her not to answer as
8 well?

9 MS. MCCAWLEY: I'm not
10 instructing her not to answer.
11 I'm just making a record.

12 MR. GUIRGUIS: It's
13 financial information --

14 MS. MENNINGER: And whether
15 she has a financial motive is
16 relevant.

17 Q. So I'm going to ask you a
18 last time: Do you have any source of
19 income?

20 MR. GUIRGUIS: I'm going to
21 instruct you again not to answer.

22 Q. Has any of your writing been
23 published by anyone?

24 A. No.

25 Q. Have you sought to have your

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2 writing published by anyone?

3 A. No.

4 Q. What is your partner's
5 occupation?

6 MR. GUIRGUIS: Objection.

7 MS. MCCAWLEY: Objection.

8 MR. GUIRGUIS: I'm going to
9 object, yeah. Same objection.

10 MS. MENNINGER: If you are
11 going to instruct the witness not
12 to answer, please say that
13 contemporaneous with your
14 objection, because there are two
15 different things: There are
16 objections and instructions not
17 to answer.

18 So are you instructing her
19 not to answer what her partner's
20 occupation is?

21 MR. GUIRGUIS: Right. Same
22 objection. I'm instructing the
23 witness not to answer on the
24 basis of both relevance and
25 because she is a third-party non-

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2 -- I'm sorry -- nonparty witness
3 who you are asking for financial
4 information about --

5 MS. MENNINGER: No, I asked
6 for an occupation.

7 MS. MCCAWLEY: I'm going to
8 object. That relates directly to
9 financial information, so it's
10 covered by New York law with
11 respect to nonparty witnesses.

12 Q. What are the names of your
13 parents?

14 A. [REDACTED]
15 [REDACTED]

16 Q. How do you spell [REDACTED]

17 A. [REDACTED]

18 Q. And where do your parents
19 live?

20 A. I'm not comfortable giving
21 my mother's and my father's address to
22 you.

23 MS. MENNINGER: Are you
24 instructing her not to answer?

25 MS. MCCAWLEY: Do you want

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2 to confer?

3 MR. GUIRGUIS: Give me a
4 moment on this.

5 THE WITNESS: We're really
6 well organized.

7 (Time noted: 9:21 a.m.)

8 (Recess.)

9 (Time noted: 9:23 a.m.)

10 Q. [REDACTED], there was a
11 question pending when you took a break
12 with your lawyers. Can you please
13 answer the question.

14 MR. GUIRGUIS: I'm
15 instructing the witness not to
16 answer questions regarding
17 current information about her own
18 location, her family's location,
19 things of that nature.

20 The witness has expressed to
21 me fears of harassment and the
22 belief that she's being followed,
23 and my understanding is that
24 there are other witnesses that
25 have had similar fears and

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2 concerns.

3 And unless you make some
4 sort of proffer of the actual
5 relevance of her parents'
6 addresses, wherever those are,
7 I'm not going to have her answer.

8 MS. MENNINGER: Okay. Where
9 does that understanding come
10 from, please, Mr. Guirguis?

11 Mr. Guirguis, where does
12 your understanding come from?
13 You just made a factual
14 representation. I would like to
15 know where your understanding
16 comes from.

17 MR. GUIRGUIS: Yeah, I'm not
18 being deposed. I'm not going to
19 answer your questions.

20 MS. MENNINGER: All right.

21 Q. [REDACTED], did you agree
22 to be a witness in the case of [REDACTED]
23 versus Maxwell?

24 A. Yes.

25 Q. Did you voluntarily agree to

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2 do that?

3 A. Yes.

4 Q. Were you promised anything
5 in exchange for your testimony in the
6 [REDACTED] versus Maxwell case?

7 A. No.

8 Q. Were you provided legal
9 counsel?

10 A. Sorry, does that mean --

11 MS. MCCAWLEY: You have a
12 lawyer, yes?

13 MR. GUIRGUIS: Yes.

14 A. Yes.

15 Q. Okay. How many lawyers do
16 you have now?

17 A. Three.

18 MS. MENNINGER: I would like
19 the record to reflect that
20 witness is checking with the
21 lawyers to get answers to these
22 questions.

23 MR. POTTINGER: Wait, wait,
24 wait. Objection.

25 MR. GUIRGUIS: There is

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2 absolutely no exchange. No words
3 were spoken by --

4 MS. MENNINGER:
5 Mr. Pottinger, did you put up a
6 number of fingers?

7 Did you put up a number of
8 fingers, Mr. Pottinger?

9 MR. POTTINGER: You said,
10 I'm going to object because the
11 witness is answering these
12 questions, in the plural.

13 MS. MENNINGER: Mm-hmm.

14 MR. POTTINGER: That is
15 inaccurate. When she looked at
16 me to ask how many lawyers she
17 had, I said three with three
18 fingers. That is a single
19 request on her part and a single
20 answer, not multiple.

21 MS. MENNINGER: No. She has
22 looked to her lawyers for
23 previous answers.

24 We'll just make a record as
25 we go along. Thank you.

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2 MS. MCCAWLEY: You could
3 have had a videotape here so that
4 we would have a record of that,
5 because I think your verbal
6 record is inaccurate, so...

7 MR. POTTINGER: And, in
8 fact, she -- this is Mr.
9 Pottinger speaking.

10 And, in fact, she has not
11 looked at me during this
12 deposition except one time, which
13 was for what I took to be a
14 request to know how many lawyers
15 she has.

16 MS. MENNINGER: So are you
17 being deposed, Mr. Pottinger?

18 MR. POTTINGER: I am not.

19 Q. [REDACTED], how many
20 lawyers do you think you have?

21 A. Three.

22 Q. Can you please name them?

23 A. Peter, Sigrid and Stan.

24 Q. Is Mr. [REDACTED] [REDACTED]
25 representing you?

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2 A. Yes.

3 Q. Is Mr. Paul Cassell
4 representing you?

5 A. No.

6 Q. Is Mr. David Boies
7 representing you?

8 A. Yes.

9 MS. MCCAWLEY: I just want
10 to be clear for the record if
11 you're talking about representing
12 generally or you're talking about
13 a particular matter. Because we
14 have a couple matters.

15 MS. MENNINGER: I'm asking
16 questions here.

17 MS. MCCAWLEY: No, I
18 understand that you have to make
19 the record clear --

20 MS. MENNINGER: Ms.
21 McCawley, if you want to ask her
22 questions later, you are more
23 than welcome to do so. I am
24 going to ask questions of the
25 witness I am deposing.

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2 MS. MCCAWLEY: Well, we want
3 the record to be clear that there
4 are more than one action --

5 MS. MENNINGER: You can ask
6 questions when you're doing your
7 questioning. I'm doing my
8 questioning now, and so I will
9 ask the questions.

10 MS. MCCAWLEY: I'm going to
11 object. The record should be
12 clear there is more than one
13 action pending here. She is
14 represented here as a nonparty
15 witness, and she also has her own
16 action pending.

17 MR. PAGLIUCA: Thank you for
18 that speaking objection, Ms.
19 McCawley, and communicating that
20 information to the witness, which
21 you know is totally improper.

22 MS. MCCAWLEY: Now, that's
23 two people objecting right now.
24 Is it going to be Laura taking
25 this deposition or you, Jeff?

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2 You guys have done this to me
3 before, and it's not a position
4 where you're allowed to object
5 and she's allowed to object. You
6 guys pulled that at the last
7 deposition, so please do not do
8 this here.

9 MR. PAGLIUCA: I was just
10 thanking you.

11 Q. All right. So the number of
12 lawyers we're up to so far is
13 Mr. Guirguis, Ms. McCawley,
14 Mr. Pottinger, Mr. [REDACTED], Mr. Boies.

15 That's five, correct?

16 A. Can I just ask you a
17 question?

18 Q. No, you cannot.

19 A. Okay.

20 Q. Are those five lawyers that
21 are representing you?

22 MR. GUIRGUIS: Objection.

23 Q. Yes or no?

24 A. Yes.

25 Q. All right. Anyone else

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2 representing you?

3 A. No.

4 Q. [REDACTED]

5 [REDACTED] representing you?

6 A. No.

7 Q. How much are you paying for
8 any of those lawyers?

9 A. It's on a pro-bono basis.

10 Q. Do you know what each of
11 those lawyers' normal hourly rates
12 are?

13 A. No.

14 Q. Do you know how many hours
15 you have spent with your attorneys?

16 A. No.

17 MR. GUIRGUIS: Objection.

18 Q. How many hours have you
19 spent with Mr. Guirguis?

20 MR. GUIRGUIS: Objection.

21 Q. Without communicating to me
22 any information you and he have
23 shared.

24 A. A few, maybe.

25 Q. How many?

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2 A. About 11 hours in total.

3 Q. When is the first time that
4 you met Mr. Guirguis?

5 MR. GUIRGUIS: Objection.

6 MS. MCCAWLEY: You can
7 answer.

8 MR. GUIRGUIS: You can
9 answer.

10 A. Yesterday.

11 Q. You met Mr. Guirguis
12 yesterday? Was that your answer?

13 A. Yes.

14 Q. And who is paying for
15 Mr. Guirguis's fees, if you know?

16 A. I have a pro-bono
17 arrangement.

18 Q. Do you know if he's
19 receiving money from anyone else in
20 exchange for representing you?

21 A. No.

22 Q. No, you don't know, or no,
23 he is not?

24 A. I don't know.

25 Q. How many hours have you

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2 spent with Ms. McCawley?

3 A. Can I just clarify that
4 question? Does that mean on the
5 phone? Like what are you referring
6 to, in person or --

7 Q. Either one. How many hours,
8 how much time have you spent with
9 Ms. McCawley in person?

10 A. I met with Ms. McCawley for
11 the first time in person yesterday,
12 but I've spent -- yeah, we've been --
13 Ms. McCawley was the first person I
14 actually spoke to.

15 Q. And how many hours have you
16 spent with her on the phone?

17 A. Many, many hours.

18 Q. Approximately how many?

19 A. I don't know.

20 Q. Five?

21 MR. GUIRGUIS: Objection.

22 A. More than five.

23 Q. Ten?

24 MR. GUIRGUIS: Objection.

25 Q. Ten?

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2 A. Well, 10, 15. She's been
3 with me the whole way since when I
4 came forward, so she's been a very
5 prominent person.

6 Q. And when did you first speak
7 with her on the phone?

8 A. I think it was --

9 Q. Without telling me what you
10 said.

11 A. I think it was November.

12 Q. November what?

13 A. I can't remember the date.

14 Q. Early November? Late
15 November?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. Was she speaking to you on
19 your cell phone or a landline?

20 A. Cell phone.

21 Q. A mobile number or a
22 landline?

23 A. A cell phone.

24 Q. Okay. And what's that cell
25 phone number?

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2 A. I don't have it anymore.

3 Q. That's okay. What's the
4 cell phone number?

5 A. I actually don't know. I
6 can't remember my cell phone number.
7 I don't have anything with me, so I
8 can't remember that number offhand.

9 Q. How long did you have that
10 cell phone?

11 A. About eight months.

12 Q. What happened to it?

13 A. I got rid of it.

14 Q. Why?

15 A. Because I fear for my life
16 because of Jeffrey Epstein and
17 Ghislaine Maxwell.

18 Q. What did you do with it?

19 A. I sold it.

20 Q. When?

21 A. November.

22 Q. Before or after you first
23 spoke with Ms. McCawley?

24 A. Before.

25 Q. So then how did you speak

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2 with Ms. McCawley over the phone?

3 A. On my partner's cell phone.

4 Q. What's his cell phone
5 number?

6 MS. MCCAWLEY: Objection.
7 What's the relevance of her
8 partner's cell phone?

9 Again, this is irrelevant.
10 It's harassing. It's -- you're
11 seeking information to be able
12 to -- the witness has already
13 expressed fear about her --
14 people currently going after her.
15 So we would object to that
16 intimidation of a nonparty
17 witness.

18 Q. What is your partner's cell
19 phone number?

20 MR. GUIRGUIS: I'm directing
21 the witness not to answer.

22 Q. How many hours have you
23 spent speaking with Mr. Pottinger?

24 A. I've been speaking to
25 Mr. Pottinger from November.

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2 Q. When in November?

3 A. I can't remember.

4 Q. On your same cell phone that
5 you got rid of?

6 A. No, on my partner's cell
7 phone.

8 Q. And when did you first meet
9 Mr. Pottinger in person?

10 A. It was in the beginning of
11 January.

12 Q. And where was that meeting?

13 A. Barcelona.

14 Q. Where in Barcelona?

15 A. Barcelona. It's Barcelona.
16 We meet -- I can't remember the area.

17 Q. In a restaurant? In a
18 hotel? In an office?

19 A. In a hotel.

20 Q. And how long did you spend
21 with Mr. Pottinger on that occasion?

22 A. Two days.

23 Q. How many hours over the two
24 days?

25 A. Gosh, about 16.

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2 Q. How many hours did you spend
3 with Mr. [REDACTED]

4 [REDACTED]. MCCAWLEY: Objection.

5 A. The same amount.

6 Q. He was with Mr. Pottinger?

7 A. Yeah, yes.

8 Q. And Mr. Boies, how much time
9 have you spent with Mr. Boies?

10 A. I haven't spent any time
11 with him yet.

12 Q. Have you met him?

13 A. No.

14 Q. Have you spoken to him on
15 the phone?

16 A. No.

17 Q. And you have not paid any
18 money for any of those lawyers' time,
19 correct?

20 A. Yes.

21 Q. In addition to your free
22 legal counsel, were you given anything
23 else in exchange for your agreement to
24 be a witness in this case?

25 MR. GUIRGUIS: Objection.

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2 A. No.

3 Q. Did you fly over here?

4 A. Yes.

5 Q. From Barcelona?

6 A. Yes.

7 Q. Did you pay for the plane

8 ticket?

9 A. Yes.

10 Q. How much was the plane

11 ticket?

12 A. It was -- I think it was

13 1,000 -- it was 1,000 -- I can't

14 remember the exact total.

15 Q. Has anyone agreed to

16 reimburse you for that?

17 A. No.

18 Q. And you're staying where

19 while you're here?

20 MR. GUIRGUIS: Objection.

21 And direct you not to answer

22 that.

23 Q. Are you staying in a hotel

24 while you're here?

25 MR. GUIRGUIS: You can

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2 answer that.

3 A. Yeah.

4 Q. Are you paying for that?

5 MR. GUIRGUIS: Objection.

6 I'm directing you not to

7 answer.

8 MS. MCCAWLEY: You can

9 answer.

10 MR. GUIRGUIS: I think you

11 can answer.

12 MS. MCCAWLEY: Yeah, I think

13 you can answer.

14 MR. GUIRGUIS: That's fine.

15 I agree.

16 MS. MCCAWLEY: You're a

17 nonparty witness. You can answer

18 that question.

19 MS. MENNINGER: Who is --

20 MS. MCCAWLEY: I am

21 representing Virginia. He is

22 representing the witness.

23 MS. MENNINGER: Well, you're

24 representing the witness as well,

25 right?

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2 MS. MCCAWLEY: I'm not.

3 MS. MENNINGER: Well, did
4 you just tell her she can answer
5 a question?

6 MS. MCCAWLEY: I did.

7 Q. Are you paying for the
8 hotel?

9 A. No.

10 Q. Who's paying for the hotel?

11 A. It's on expenses, I think,
12 of a witness. It's expenses from --
13 yeah, I don't know, actually.

14 Q. You don't know who is paying
15 for your hotel?

16 A. No.

17 Q. It's not you?

18 A. No.

19 Q. And how much per night is
20 your hotel?

21 A. I have no idea.

22 Q. How long are you staying
23 here on this trip?

24 A. Just for the deposition.

25 Q. Okay. When did you arrive?

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2 A. It was Tuesday, late Tuesday
3 night.

4 Q. And when are you leaving?

5 A. Tomorrow evening.

6 Q. In addition to your legal
7 counsel and your hotel, is there
8 anything else you've been given in
9 exchange for your --

10 A. No.

11 Q. -- to be a witness in this
12 case?

13 You have to wait for me to
14 finish my question before you answer.

15 A. Sorry.

16 Q. Have you been given anything
17 else?

18 A. No.

19 Q. Have you been promised
20 anything else?

21 A. No.

22 Q. Have you been promised that
23 you would have counsel to help you
24 bring a lawsuit against a number of
25 people?

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2 MS. MCCAWLEY: Objection.

3 To the extent this gets into
4 attorney/client privileged
5 information, you're not allowed
6 to answer.

7 Q. Have your lawyers agreed to
8 bring a lawsuit on your behalf against
9 a number of people?

10 A. Yes.

11 Q. And are you paying for that
12 counsel?

13 A. No.

14 Q. Have you reached any
15 agreement about a contingency fee for
16 that case?

17 A. Can you explain what
18 contingency means? Sorry.

19 Q. Do you expect to receive
20 money as a result of that lawsuit?

21 A. ■■■, no. No.

22 Q. You're not asking to receive
23 any money as a result of that lawsuit?

24 A. No. No.

25 Q. All right. So have you had

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2 any agreements regarding writing a
3 book --

4 A. No.

5 Q. -- about your experience?

6 You have to wait for me to
7 finish my question.

8 Have you had any agreements
9 with your lawyers about media rights
10 in any form?

11 MR. GUIRGUIS: Objection to
12 the extent that you're asking
13 about communications with the
14 attorneys.

15 MS. MENNINGER: I'm asking
16 about her arrangement with her
17 attorneys, which is not
18 privileged.

19 A. Can you please repeat the
20 question.

21 Q. Have you reached any
22 agreement with your attorneys
23 regarding media rights for your story?

24 A. No.

25 Q. Have you talked to anyone

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2 about publishing anything relating to
3 your story?

4 A. Can you repeat the question,
5 please.

6 MS. MENNINGER: Can you read
7 it back.

8 (Requested portion of the
9 record was read back.)

10 A. Yes, I have.

11 Q. Who have spoken to?

12 A. The New York Post.

13 Q. Who at the New York Post?

14 A. Maureen Callahan.

15 Q. And when did you speak with
16 her?

17 A. I think it was later
18 October.

19 Q. Have you spoken with her
20 since?

21 A. No.

22 Q. And how long did you speak
23 to her?

24 A. I spoke to her for, gosh,
25 about 30 minutes on the phone once.

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2 Q. And what was -- what did you
3 tell her in your phone call?

4 A. I told her what Jeffrey
5 Epstein and Ghislaine Maxwell did to
6 me and the other girls.

7 Q. Did she give you any money
8 in exchange for that interview?

9 A. No.

10 Q. Did she publish anything
11 related to that interview?

12 A. No.

13 Q. How did you get in touch
14 with Ms. Callahan?

15 A. I emailed after I read an
16 article that she had written about
17 Jeffrey Epstein, and the last sentence
18 was -- it was on the 16th of October,
19 and one of the last sentences I
20 remember was, will we ever know the
21 true extent of Jeffrey Epstein's
22 victims. And I wrote her after that
23 because, well, it still continues,
24 doesn't it.

25 Q. Where is the email that you

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2 wrote her?

3 A. It's on a -- it's on my
4 computer.

5 Q. Okay. In your Yahoo
6 account?

7 A. Yes.

8 Q. Did you have any agreement
9 with her to have any additional
10 conversation?

11 A. Yes.

12 Q. And what was that agreement?

13 A. It wasn't an agreement per
14 such. What actually happened was I
15 came forward. As soon as I came
16 forward, there was -- where I live in
17 Barcelona, there's quite a lot -- it's
18 quite busy traffic with people.

19 I came forward to Maureen
20 Callahan. I wanted to tell my story,
21 and I want to run a campaign in which
22 all the girls that have been abused by
23 Ghislaine and Jeffrey can come
24 forward. And I wanted to run a
25 campaign with the New York Post to get

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2 these girls to have the courage to
3 come forward, because I know a lot of
4 them are frightened like myself.

5 The email correspondence I
6 had with Maureen Callahan, she was
7 going away or something and she was
8 going to write a piece in the New York
9 Post about my story. During that time
10 it was the elections, so there was a
11 lot more other things going on.

12 There were two people
13 following me after I came forward to
14 Maureen Callahan. I went to -- I
15 walked downstairs. I walked around --
16 I have a usual routine that I do. In
17 the morning I went out, I saw the same
18 two people. Later on that afternoon,
19 I saw the same two people again. I
20 was frightened. I'm frightened for my
21 life, absolutely frightened. So there
22 you go.

23 So that's what I was --
24 communication stopped between Maureen
25 Callahan and I. I got really angry

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2 with Maureen because she had obviously
3 told someone. Being the New York
4 Post, so, you know.

5 Q. So you had an email to
6 Ms. Callahan and an email back from
7 her?

8 A. Yes.

9 Q. More than one?

10 A. Yes.

11 Q. How many?

12 A. I can't remember.

13 Q. More than ten or less than
14 ten?

15 A. Less than ten.

16 Q. And you had one phone call
17 with her or more than one?

18 A. Just one.

19 Q. And it lasted about 30
20 minutes?

21 A. About that.

22 Q. And was that also on the
23 cell phone that you got rid of?

24 A. That was on my partner's
25 cell phone.

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2 Q. And what had you read in the
3 press that caused you to get in touch
4 with Ms. Callahan?

5 MS. MCCAWLEY: Objection to
6 form. Go ahead.

7 A. You can read the article
8 yourself. It's on the 16th of
9 October, there's an article in the New
10 York Post written by Maureen Callahan.
11 You can read it. And that's what
12 inspired me to come forward.

13 Q. What do you recall about
14 that article?

15 A. █, I can't remember. The
16 one thing I do remember is the last
17 sentence of the article, which has
18 stuck with me and quite prominent, and
19 that is, will we ever know the true
20 extent of Jeffrey Epstein's victims.

21 Q. Do you recall anything else
22 about the article?

23 A. It's just the same. When I
24 read the article, the stuff that I had
25 experienced myself with Jeffrey, it's

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2 just same old stuff, just continuing.

3 I thought he had stopped abusing

4 girls.

5 Q. What do you recall reading a

6 article that Jeffrey Epstein was

7 doing?

8 A. I can't remember.

9 Q. Anything at all?

10 A. You can read the article. I

11 can't remember.

12 Q. The question is what you

13 remember.

14 A. I can't remember.

15 Q. You remember nothing else

16 about the article --

17 MS. MCCAWLEY: Asked and

18 answered objection.

19 Q. -- except it was related to

20 Jeffrey Epstein and it ended with the

21 sentence that you've described?

22 MS. MCCAWLEY: Objection,

23 asked and answered.

24 A. Yes.

25 Q. What do you know about other

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2 girls being frightened?

3 A. I know that the girls on the
4 island and in New York during my time
5 with Jeffrey and Ghislaine, that they
6 were frightened.

7 Q. Okay. What are the names of
8 those girls?

9 A. [REDACTED] [REDACTED]. [REDACTED]
10 -- I don't know her surname. I can't
11 remember her surname.

12 Q. How do you spell the first
13 name?

14 A. [REDACTED] [REDACTED] I'm just taking a
15 guess, [REDACTED], I'm guessing, I
16 think.

17 MR. GUIRGUIS: I'm going to
18 remind the witness I told her not
19 to speculate, but that's okay.

20 Q. In addition to [REDACTED]
21 [REDACTED] and [REDACTED] what are the
22 names of the other girls who you
23 believe are frightened?

24 A. [REDACTED] There were a
25 couple other girls I met during my

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2 time with Ghislaine and Jeffrey that
3 were frightened.

4 Q. What were the names of the
5 girls that you met that were
6 frightened?

7 A. There was [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]. And there were two
9 other girls, I can't remember their
10 names.

11 Q. Okay. Please describe them.

12 A. The -- describe all the
13 girls or --

14 Q. No. We're talking about the
15 girls that you met on the island that
16 you described as frightened.

17 A. Okay. On the island --

18 MR. GUIRGUIS: Objection.
19 You seem to be suggesting that
20 all those girls are from the
21 island. I'm not sure that's the
22 testimony.

23 Q. All right. You said girls
24 on the island and in New York who are
25 frightened. I asked you for their

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2 names.

3 You gave me three, correct?

4 A. Yes.

5 Q. You said there were two
6 others, correct?

7 A. Mm-hmm.

8 Q. What did those two other
9 girls look like?

10 A. I can't really remember.
11 One had blonde hair; long, blonde
12 hair.

13 Q. Anything else about that?

14 A. I can't remember.

15 Q. The other girl, can you
16 remember her hair color?

17 A. No, I can't remember.

18 Q. Do you know the height of
19 either one of them?

20 A. No, I can't remember.

21 Q. Do you have a photograph of
22 either one of them?

23 A. No.

24 Q. And where did you meet these
25 two other girls?

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2 A. In New York.

3 Q. Where in New York?

4 A. I can't remember.

5 Q. You don't know the location
6 at all?

7 A. No. It was ten years ago.

8 Q. Was it in a home or in a
9 commercial setting?

10 A. I met girls commercially and
11 in home settings.

12 Q. Where did you meet these two
13 other girls you described as being
14 frightened?

15 A. I can't remember.

16 Q. What is [REDACTED]'s last
17 name?

18 A. I don't know.

19 Q. What does [REDACTED] look
20 like?

21 A. She's got long, blonde hair.

22 Q. How long?

23 A. Long, long hair.

24 Q. Longer than your hair now?

25 A. I think so. I think it was

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2 longer.

3 Q. So middle of her back?

4 A. I can't -- I can't remember
5 on how long her hair is.

6 Q. Where did you meet [REDACTED]

7 A. I met [REDACTED] first in New
8 York.

9 Q. Where in New York?

10 A. I can't remember.

11 Q. Anywhere in New York? You
12 can't remember at all?

13 A. I can't remember the
14 location.

15 Q. Was it at Mr. Epstein's
16 home?

17 MR. GUIRGUIS: Objection.
18 You have asked her now almost 20
19 questions about where she met
20 these girls, and she has
21 consistently said that she does
22 not remember.

23 Q. Was it in Mr. Epstein's
24 home?

25 A. No.

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2 Q. Was it at a club?

3 MR. GUIRGUIS: Are we going
4 to spend seven hours with her
5 saying I can't remember where she
6 met these two girls?

7 Q. Was it at a club?

8 A. One was at a club.

9 Q. Which one?

10 A. [REDACTED] [REDACTED].

11 Q. Where did you meet [REDACTED]

12 A. I first met [REDACTED] on the
13 island.

14 Q. Did you meet her a second
15 time?

16 A. Yes.

17 Q. Where did you meet her the
18 second time?

19 A. I can't remember.

20 Q. State?

21 A. Can't remember.

22 Q. Country?

23 A. Well, U.S.

24 THE WITNESS: Sorry, can I
25 have a break? I actually need to

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2 go to the bathroom. Sorry.

3 MS. MENNINGER: Yes, I don't
4 think I have a question pending.

5 We'll go off the record now.

6 (Time noted: 9:52 a.m.)

7 (Recess.)

8 (Time noted: 10:07 a.m.)

9 Q. So I want to return to your
10 conversations with Ms. Callahan,
11 conversation with Ms. Callahan.

12 Did you have any further
13 communications with her after the
14 phone call you described?

15 A. There were, I think, a few
16 emails exchanged, but nothing ever
17 came about it.

18 Q. And, again, those are emails
19 from your Yahoo account?

20 A. Yes.

21 Q. Did you ask Ms. Callahan for
22 compensation in exchange for your
23 story?

24 MS. MCCAWLEY: Objection,
25 asked and answered.

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2 A. No.

3 Q. Had you seen any other
4 stories in the press about Jeffrey
5 Epstein?

6 A. Through the last ten years,
7 I've seen a few articles written about
8 Jeffrey Epstein.

9 Q. What do you recall about
10 those articles?

11 A. The way he used to abuse
12 girls. Basically articles written
13 very similar to my own story -- well,
14 identical, so...

15 Q. And have you written down
16 your story?

17 A. No.

18 Q. Nowhere?

19 A. No.

20 Q. Did you see any articles
21 about [REDACTED]?

22 A. Yes.

23 Q. Which articles did you see
24 about [REDACTED]?

25 A. I can't remember. It was

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2 quite some time ago.

3 Q. What do you recall about it?

4 A. She came forward and I
5 was -- it was a few years ago that she
6 came forward, and her story was
7 exactly the same as mine.

8 I can't remember
9 specifically what article I read, but
10 every single article I did read during
11 the duration of that time, she
12 experienced the same thing I did.

13 So it was more or less the
14 same context and it's the same story
15 in all articles, really.

16 Q. So you were reading these
17 articles over the course of a period
18 of ten years, you think?

19 A. Yeah. I didn't pay much
20 attention to it because I've spent the
21 last ten years trying to get over that
22 experience, and I've been frightened
23 to come forward.

24 Q. And when you read the
25 articles, you noticed that there were

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2 details that you thought were similar
3 to your experience?

4 MS. MCCAWLEY: Objection.

5 A. They were details that were
6 exactly the same as what I had
7 experienced.

8 Q. Do you know whether anyone
9 else had brought lawsuits against
10 Mr. Epstein?

11 A. No.

12 Q. Did you save any of these
13 articles that you read?

14 A. Sorry, can you repeat that.

15 Q. Did you save any of the
16 articles that you read?

17 A. No.

18 Q. Where did you grow up?

19 A. I grew up in South Africa.
20 I then finished school in Scotland.

21 Q. When did you move to
22 Scotland? How old were you?

23 A. I was 14.

24 Q. Did your family move to
25 Scotland or just you?

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2 A. Just myself.

3 Q. Are you a South African
4 citizen?

5 A. Yes.

6 Q. Do you have a South African
7 passport?

8 A. Well, yeah. It was stolen.
9 I'm reapplying for a new one. I have
10 to renew my South African passport.
11 It was stolen. South Africa for you.

12 Q. So when did you get that
13 South African passport?

14 A. I can't remember. I've had
15 a South African passport my whole
16 life, so...

17 Q. And when was it stolen?

18 A. I think it was 2014, 2015.

19 Q. So you were born in South
20 Africa, you're a South African
21 citizen, and you had a South African
22 passport your whole life.

23 Have I got that right?

24 A. Mm-hmm.

25 Q. Yes or no?

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2 MR. GUIRGUIS: Objection to
3 form.

4 You can answer.

5 A. Yes.

6 Q. Did you also have a British
7 passport?

8 A. Yes.

9 Q. How did that come about?

10 A. My mom's side of the family
11 is British.

12 Q. And when did you get a
13 British passport?

14 A. I think when I was about
15 five.

16 Q. Do you have a dual
17 citizenship?

18 A. Yes.

19 Q. And do you travel using both
20 passports?

21 A. It's really complicated. I
22 only use my South African passport
23 when I enter into South Africa. So
24 that's the only time I use my South
25 African passport, then.

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2 Other than that, I use my
3 British passport for all other
4 transportation. Because South Africa
5 you need, like, a visa; it's really
6 complicated. So I'm lucky I've got a
7 British passport.

8 Q. It's easier to travel on a
9 British passport than a South African
10 passport?

11 A. Yeah, a lot easier. A lot
12 easier.

13 Q. All right. Did you have any
14 siblings growing up?

15 A. Yes.

16 Q. How many?

17 A. I've got one real older
18 brother and then I've got a half
19 younger brother and a half younger
20 sister.

21 Q. Did you all grow up in the
22 same home?

23 A. No.

24 Q. Who did you grow up in the
25 same home with? I don't need their

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2 names, but just the people you just
3 described.

4 MR. GUIRGUIS: Objection.

5 You can answer.

6 A. I grew up with my mom and my
7 stepdad, and my brother was just
8 entering boarding school.

9 And then I lived with my
10 auntie and uncle in Scotland.

11 Q. And cousins?

12 A. Yeah, and cousins. One
13 cousin.

14 Q. And how long did you attend
15 school in Scotland?

16 A. About three years.

17 Q. Did you graduate?

18 A. Yep, yes.

19 Q. Is that the equivalent of
20 our high school?

21 A. Yeah, it is.

22 Q. Did you go to college?

23 A. I went to university to
24 study psychology and sociology.

25 Q. Where did you go?

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2 A. Queen Margaret University in
3 Edinburgh.

4 Q. Did you graduate?

5 A. No, I didn't.

6 Q. Did you go to that college
7 immediately after graduating from high
8 school?

9 A. No.

10 Q. When did you go to that
11 college?

12 A. 2004.

13 Q. And how long did you stay at
14 Queen Margaret college?

15 A. A year and a half.

16 Q. Why did you leave college?

17 A. I chose the wrong course. I
18 didn't -- I didn't really agree with
19 what I was being taught in sociology,
20 so I quit.

21 Q. During the time you were in
22 college, did you work?

23 A. Yes.

24 Q. Where did you work?

25 A. I was a waitress at a bar.

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2 Q. Anything else?

3 A. No.

4 Q. Have you ever been married?

5 A. No.

6 Q. Have you ever been engaged?

7 A. Yes.

8 Q. To whom?

9 A. [REDACTED] [REDACTED].

10 Q. Your current partner?

11 A. Yes.

12 Q. Anyone else?

13 A. Yes, I have.

14 Q. Who else have you been
15 engaged to?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 A. I don't really see the
19 relevance in that.

20 Q. Who else have you been
21 engaged to?

22 A. [REDACTED] [REDACTED].

23 Q. Was he listed in your
24 passport?

25 A. Yes.

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2 Q. Anyone else?

3 A. Listed on my passport?

4 Sorry.

5 Q. Have you been engaged to
6 anyone else?

7 A. [REDACTED], sorry. I've got a
8 really bad train... No.

9 Q. During what period of time
10 were you engaged to [REDACTED] [REDACTED]?

11 A. I can't remember.

12 Q. Was it before 2006 or after?

13 A. After.

14 Q. How long after?

15 A. Three years.

16 Q. Did you know Mr. [REDACTED]
17 during 2006?

18 A. It's [REDACTED], sorry.

19 [REDACTED].

20 Vaguely, vaguely. We lost
21 contact.

22 Q. When did you lose contact?

23 A. In 2006.

24 Q. And when did you reestablish
25 contact?

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2 A. 2008.

3 Q. Do you go by any other
4 names?

5 A. No.

6 Q. Do you go by [REDACTED]
7 online?

8 A. I don't think so. I don't
9 know.

10 Q. On Twitter?

11 A. I don't have any social
12 media platforms, so I can't remember.

13 Q. Have you ever gone by
14 [REDACTED], all one word, on
15 Twitter?

16 A. I can't remember.

17 Q. Do you have any tattoos?

18 A. Yes.

19 Q. Where?

20 A. One here.

21 Q. Indicating on your arm?

22 A. Indicating on my arm, sorry.
23 No camera.

24 Yes, I have one, two, three
25 four.

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2 Q. Where is the second one?

3 A. I've got four.

4 Q. All right. Just tell me
5 where they are.

6 A. One is on my arm, one is on
7 my right hip, one's on my upper bikini
8 line on my right inner thigh, and I've
9 got one on my left side on my rib
10 cage.

11 Q. Okay. Have you had them for
12 a long time?

13 A. I've had -- hang on. Two I
14 have had for a long time.

15 Q. Which ones are they?

16 A. The scorpion on my right hip
17 and my Leo symbol on my bikini line.

18 Q. Have you ever obtained a
19 college degree?

20 A. No.

21 Q. Have you ever gone back to
22 college?

23 A. I have tried to. I wanted
24 to.

25 Q. When did you do that?

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2 A. When I moved to New York.

3 Q. In 2006?

4 A. Correct.

5 Q. Any other time?

6 A. Well, recent. I mean, I'm
7 going back to university next year, so
8 I'm currently relooking at colleges.
9 I'm going back to do my psychology
10 degree.

11 Q. Where?

12 A. I haven't decided yet
13 because I'm looking for an open degree
14 -- well, sorry, home learning, so I
15 haven't found somewhere yet. But I'm
16 currently going -- well, my aim is to
17 go back to university and get
18 qualified.

19 Q. Between 2006 and today, have
20 you applied to any other colleges?

21 A. No.

22 ■, yes. Sorry, can you
23 repeat the question? Sorry.

24 MS. MENNINGER: He can read
25 it back.

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2 A. Yes. Yes.

3 Q. Okay. When did you apply to
4 colleges between 2006 and today?

5 A. It was 2006.

6 Q. Is that FIT?

7 A. That's correct.

8 Q. Anywhere else?

9 A. No.

10 Q. Other than working as a
11 waitress at a bar during college in
12 2004-2005, what other employment have
13 you had?

14 A. I have worked in
15 hospitality. I've worked in
16 superyachting, those wealthy people
17 that have superyachts. I used to work
18 for them. I have done modeling. And
19 I can't remember any...

20 Q. Did you have a modeling
21 agent?

22 A. I did in Scotland.

23 Q. In college?

24 A. Mm-hmm, that's correct.

25 Q. Any other time?

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2 A. No.

3 Q. And what type of modeling
4 was that?

5 A. Just commercial.

6 Q. Print?

7 A. Yep.

8 Q. Runway?

9 A. Yep.

10 Q. TV or ads?

11 A. No.

12 Q. And all in Scotland?

13 A. No.

14 Q. Where else did you model?

15 A. New York.

16 Q. Anywhere else?

17 A. No.

18 Q. London?

19 A. ■■■, yeah, I did, sorry. I
20 did do modeling, a bit of modeling in
21 London.

22 Q. All right. When did you do
23 modeling in New York?

24 A. During -- when I first
25 arrived in New York in 2006.

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2 Q. How much money did you make
3 as a model?

4 MR. GUIRGUIS: Objection.

5 A. I can't remember.

6 Q. When did you work in
7 superyachting?

8 A. I can't remember. About
9 2011. About 2011.

10 Q. And when did you work in
11 hospitality?

12 A. I've worked in hospitality
13 my whole life. I've worked in -- I
14 mean, hospitality, I've either done
15 bar work, waitressing, superyachting,
16 yeah.

17 Q. So on and off?

18 A. Yeah, on and off.

19 Q. And since you were an adult?

20 A. And since I was an adult, I
21 worked in corporate jobs as well.

22 Q. Where did you work in
23 corporate jobs?

24 A. In South Africa.

25 Q. And just so I understand,

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2 you lived in Scotland from the ages of
3 14 to 22?

4 A. That's correct.

5 Q. And then where did you move?

6 A. To New York.

7 Q. And how long did you live in
8 New York?

9 A. About seven, eight months.

10 Q. And where did you move?

11 A. Back in London.

12 Q. And how long did you live in
13 London?

14 A. Well, I lived in the UK.
15 Because I moved around a few times, so
16 I didn't just specifically live in
17 London. But I was in the UK about
18 2012.

19 Q. And then where did you move?

20 A. I then went into the
21 superyachting industry, so I didn't --
22 I lived on a boat in Italy and south
23 of France.

24 Q. Did you work for a company?

25 A. I worked for a private

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2 owner.

3 Q. On one yacht?

4 A. On multiple yachts.

5 Q. And what was your job?

6 A. Stewardess -- stewardess,

7 and then I was a deckhand.

8 Q. With wine?

9 A. Sorry?

10 Q. What's a decant?

11 A. A deckhand.

12 MS. MCCAWLEY: D-E-C-K.

13 THE WITNESS: Sorry.

14 [REDACTED],

15 deckhand. I thought you were
16 decanting wine. It's a pretty
17 good job.

18 Q. Who is the owner of the
19 ship?

20 A. I'm not allowed to specify.

21 Q. Do you have a
22 confidentiality agreement?

23 A. I did sign a confidentiality
24 agreement when I started employment.

25 Q. And how long were you

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2 employed in superyachting?

3 A. Two and a half years.

4 Q. Okay. And what did you do
5 after that?

6 A. I moved back to Cape Town.

7 Q. So that was in 2014?

8 A. I can't remember the
9 specific dates or year.

10 Q. Between 2014 and 2016?

11 A. I've moved 47 times, so I
12 can't remember.

13 Q. You can't remember what year
14 you moved back to Cape Town?

15 A. No.

16 Q. Okay. And who did you live
17 with when you moved back to Cape Town?

18 A. Myself.

19 Q. And how long did you live
20 there?

21 A. Four years.

22 Q. And you, when did you move
23 after that?

24 A. December. Yeah, it was
25 December 2015. Sorry. It was

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2 December 2015.

3 Q. Where did you move?

4 A. I moved from Cape Town to
5 London.

6 Q. And how long did you live
7 there?

8 A. Three months.

9 Q. And then where did you move?

10 A. Barcelona.

11 Q. So in March 2016?

12 A. Sorry, no, just hang on.

13 Sorry. I moved to Barcelona around
14 June, June last year.

15 Q. 2016 June?

16 A. Yeah.

17 Q. You moved to Barcelona?

18 A. Yeah.

19 Q. When you came to the U.S.,
20 you said that was in 2006?

21 A. Correct.

22 Q. And who did you come with?

23 A. Myself.

24 Q. And who paid for your plane
25 ticket?

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2 A. Myself.

3 Q. Why did you come?

4 A. I wanted to advance my
5 career.

6 Q. What year?

7 A. I wanted to go to FIT
8 university.

9 Q. Did you have a student visa
10 when you came in 2006?

11 A. No.

12 Q. Had you applied to FIT when
13 you came to New York in 2006?

14 A. No.

15 Q. Did you have a job when you
16 came here in 2006?

17 A. No.

18 Q. Where did you stay when you
19 got here in 2006?

20 A. The Upper East Side.

21 Q. With whom?

22 A. It was just a housemate,
23 house.

24 Q. What was that person's name?

25 A. ██████████

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2 Q. How do you spell [REDACTED]

3 A. [REDACTED]

4 Q. And what's the last name of

5 [REDACTED]

6 A. I can't remember.

7 Q. Male or female?

8 A. Male.

9 Q. How old?

10 A. I think he was in his 40s.

11 Q. And how did you meet [REDACTED]

12 A. I met [REDACTED] just via -- I

13 met him when -- why can't I remember?

14 I think, yeah, I was looking for an

15 apartment when I got here so it was

16 just a -- like, we just kind of met on

17 the Upper East Side and, yeah, I said

18 I was looking for somewhere to stay.

19 Q. Did you pay rent?

20 A. Yes.

21 Q. How much did you pay?

22 A. I can't remember.

23 Q. A thousand dollars?

24 MR. GUIRGUIS: Objection.

25 A. I think it was less than

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2 that.

3 Q. Did you have your own
4 bedroom?

5 A. No.

6 Q. Was [REDACTED] the only other
7 occupant?

8 A. There was another guy.

9 Q. Did you share a bed with
10 anyone at that house?

11 A. With [REDACTED]

12 Q. Were you in a relationship
13 with [REDACTED]

14 A. No.

15 Q. You slept in a bed with
16 [REDACTED] in the apartment on the Upper
17 East Side?

18 A. That's correct.

19 Q. What was the address of that
20 apartment?

21 A. I can't remember.

22 Q. Do you have any way of
23 reaching [REDACTED] now?

24 A. No, no, I don't.

25 Q. Do you know approximately

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2 where in New York it was besides the
3 Upper East Side?

4 A. I just remember it being in
5 the Upper East Side. I can't remember
6 the exact location.

7 Q. Any of the cross-streets?

8 A. I went there the other day,
9 and it looks -- it looks familiar. I
10 can't -- I can't remember
11 specifically.

12 Q. You went to the apartment
13 the other day?

14 A. No, I didn't go to the
15 apartment the other day. I went to
16 the Upper East Side yesterday -- the
17 other day, sorry. But I can't
18 remember where the apartment was, no.

19 Q. Was it a walkup or a doorman
20 or elevator kind of building?

21 A. It was an elevator building.

22 Q. Was there a doorman?

23 A. No.

24 Q. What floor were you on?

25 A. I can't remember.

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2 Q. And you don't remember how
3 you met [REDACTED]

4 MR. GUIRGUIS: Objection.

5 A. I met loads of people during
6 that time. I can't specifically
7 remember how I met every individual.

8 Q. And in the same house, there
9 was [REDACTED] and another guy?

10 A. That's correct.

11 MS. MCCAWLEY: Objection,
12 misstates --

13 Q. Do you remember the other
14 guy's name?

15 A. I can't remember.

16 Q. How long did you live with
17 [REDACTED] and the other guy?

18 A. For a -- I think it was a
19 couple months until I moved.

20 Q. And where did you move?

21 A. To Jeffrey Epstein's
22 apartment.

23 Q. What was the address to
24 that?

25 A. I think it was 2000 -

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2 sorry -- 205 East. It was Midtown
3 somewhere.

4 Q. I'm sorry, what?

5 A. It was sort of Midtown. I'm
6 not familiar with New York because I
7 haven't been here and I don't live
8 here. It was kind of Midtown, his
9 apartment.

10 Q. Okay.

11 A. If I recall, yeah.

12 Q. So it's 205 East something?

13 A. It's East -- it's East
14 something. It was the same -- it was
15 the same apartment building that [REDACTED]
16 lived in, because we lived in the same
17 building.

18 Q. Did you live in the same
19 apartment?

20 A. No.

21 Q. Did you have your own
22 apartment?

23 A. Yes.

24 Q. How big was the apartment?

25 A. It was massive.

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2 Q. How many bedrooms did it
3 have?

4 A. I can't remember. I can't
5 remember. I can't --

6 Q. Two or seven?

7 A. I just -- I remember just
8 the -- like, the living room, and it
9 was very spacious.

10 Q. Can you draw a picture of
11 the layout of it?

12 A. I wouldn't remember the
13 layout. There was -- I remember like
14 a pale blue decor.

15 Q. And no one else lived there
16 with you?

17 A. No.

18 Q. And you don't know how many
19 bedrooms?

20 A. I can't remember how many
21 bedrooms there were.

22 Q. Was there a doorman?

23 A. █, I can't remember.

24 Q. Was it a walkup or elevator?

25 A. Elevator.

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2 Q. What floor were you on?

3 A. I can't remember.

4 Q. Approximately when did you
5 move into this apartment?

6 A. It was not long after I
7 moved in with [REDACTED] About two
8 months, I think. About two months, I
9 think, roughly.

10 Q. So you lived with [REDACTED] for
11 about two months and then you moved
12 into this other apartment?

13 A. That's correct.

14 Q. And how much were you paying
15 for this new apartment?

16 A. [REDACTED], it was Jeffrey's. I
17 didn't pay a single thing.

18 Q. And who else lived in the
19 apartment building?

20 A. Quite a -- gosh. A few,
21 actually. I recall [REDACTED]

22 Q. Do you know [REDACTED] last
23 name?

24 A. I can't remember her last
25 name, [REDACTED] last name.

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2 Q. Okay. Who else?

3 A. There were a few other
4 girls. I can't remember their names.

5 Q. None of them?

6 A. No. It was a long time ago.

7 Q. What did they look like,
8 these other names you can't remember?

9 A. I can't remember. There
10 were so many. There were so many
11 girls, a constant influx of girls.

12 Q. How many?

13 MS. MCCAWLEY: Objection.

14 A. I can't remember.

15 Q. 50?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. A hundred?

19 MR. GUIRGUIS: Objection.

20 A. I can't remember.

21 Q. Can you say if it was more
22 than a thousand or less?

23 MR. GUIRGUIS: Objection.

24 A. I can't remember.

25 Q. You can't remember if it was

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2 more than a thousand?

3 A. I can't remember.

4 MR. GUIRGUIS: Objection.

5 MS. MCCAWLEY: Objection.

6 This is harassing.

7 MR. GUIRGUIS: Objection.

8 We're crossing a line here.

9 MS. MENNINGER: Okay. I'm
10 asking if she can remember if it
11 was more than a thousand or less.

12 MS. MCCAWLEY: But you
13 haven't defined it. You're not
14 saying where. In the apartment?
15 In general when she met with
16 Jeffrey? I mean --

17 MS. MENNINGER: I'm asking
18 her -- she said there were so
19 many women that were influx in
20 the apartment, and I'm asking how
21 many.

22 MS. MCCAWLEY: She didn't
23 say in the apartment. Go back
24 and look at the testimony.

25 THE WITNESS: In the

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2 building.

3 Q. Right. In the building.

4 How many females did you meet in the
5 building?

6 MR. GUIRGUIS: Objection.

7 A. I can't remember.

8 Q. And can you say it was more
9 or less than one thousand?

10 MR. GUIRGUIS: Objection.

11 A. It was less than a thousand
12 girls.

13 Q. Was it less than a hundred?

14 A. Yes, it was less than a
15 hundred.

16 Q. Was it less than 50?

17 A. I can't remember.

18 Q. Apart from [REDACTED] can you
19 name any other one of the females that
20 you met in the apartment building?

21 MR. GUIRGUIS: Objection.

22 A. I can't remember.

23 Q. Can you describe any of
24 them?

25 MR. GUIRGUIS: Objection.

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2 A. I can't remember.

3 Q. Did you do any employment
4 while you were here in the U.S. in the
5 fall of 2006?

6 MR. GUIRGUIS: Objection.

7 A. I did freelance modeling.

8 Q. Who did you do that for?

9 A. Various photographers.

10 Q. Do you have those
11 photographs still?

12 A. No.

13 Q. Do you have a portfolio?

14 A. I used to have one.

15 Q. Do you currently have a
16 modeling portfolio?

17 A. No.

18 Q. Do you have any of your
19 modeling photos?

20 MS. MCCAWLEY: Objection,
21 asked and answered.

22 A. Yeah, I got a couple.

23 Q. Where are they?

24 A. At home.

25 Q. In Barcelona?

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2 A. That's correct.

3 Q. Are they on a computer?

4 A. No.

5 Q. When you came to the U.S. in
6 the fall of 2006, was there a limit on
7 how long you could stay here?

8 MR. GUIRGUIS: Objection.

9 A. Yes, there was.

10 Q. What was that?

11 A. It was a three-month tourist
12 visa.

13 Q. Were you permitted to be
14 employed while you were here on a
15 tourist visa?

16 MR. GUIRGUIS: Objection.

17 Hold on a second.

18 MS. MENNINGER: I don't know
19 what kind of visa she was on.
20 I'm just asking the question.

21 MR. GUIRGUIS: I don't -- I
22 don't know why her visa status is
23 relevant or why we're going to
24 get into things that [REDACTED] [REDACTED]
25 might be interested in, so I'm

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2 not going to have her sit here
3 and testify about whether she was
4 complying with immigration law or
5 not.

6 MS. MENNINGER: Is she
7 taking the Fifth Amendment?

8 MR. GUIRGUIS: I'm just not
9 sure that you need to ask the
10 question.

11 MS. MENNINGER: Well, I did
12 ask the question. I want to know
13 if she was permitted, on the type
14 of visa she came in on the fall
15 of 2006, to engage in paid
16 employment.

17 MR. GUIRGUIS: Okay. Now
18 that I hear the question, you can
19 answer it if you know the answer.

20 A. No.

21 Q. No, you were not permitted
22 to do paid employment, correct?

23 A. That's correct.

24 Q. You did paid employment
25 while you were here on the tourist

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2 visa, correct?

3 A. I wouldn't quite say -- I
4 kind of -- I wasn't that great at it,
5 so I didn't make a lot of money doing
6 modeling. I was too fat, apparently.
7 So I wouldn't say I milked the bank
8 there.

9 (An off-the-record
10 discussion was held.)

11 A. Milked the bank with my
12 modeling -- amazing modeling career.

13 Q. So you came over in order to
14 further your education, I think you
15 testified to earlier, correct?

16 A. That's correct.

17 Q. So while you were here
18 during those three months -- was it
19 three months you said, at first, on
20 the tourist visa? Correct?

21 A. Yes, yeah.

22 Q. When you were here those
23 first three months, what did you do to
24 further your education?

25 A. I started looking at

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2 universities or colleges, researching
3 what was the right one for me to go
4 to.

5 By that stage, I -- I've
6 always been interested in the fashion
7 industry, designing, clothes
8 designing. And New York was -- well,
9 this is the place to be for it.

10 So, yeah, I did quite a lot
11 of research on which university, what
12 kind of people were there and
13 etcetera, so...

14 Q. How were you supporting
15 yourself while you were living in New
16 York during the three-month period
17 after you initially arrived?

18 A. I had some savings.

19 Q. Was your family providing
20 you any money?

21 A. No.

22 Q. Apart from your savings, was
23 there any other source of income
24 during October or so of 2006?

25 A. I did the occasional, I

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2 guess, job where I was called to
3 entertain or spend time with people,
4 but that was about it.

5 Q. What does that mean?

6 A. Well, I don't really like to
7 use the word per se, because you guys
8 kind of, in your legal minds, have it
9 in a box of what you think it is.

10 But, like, once or twice, I
11 was paid to spend dinner with a
12 gentleman during that time.

13 Q. And how did you meet the
14 gentleman?

15 A. It was through an agency.

16 Q. What was the name of the
17 agency?

18 A. I can't remember.

19 Q. Do you know where it was
20 located?

21 A. No.

22 Q. Do you know how much you
23 were paid to spend dinner time with a
24 gentleman?

25 A. It depended how long the

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2 dinner was for.

3 Q. And what was the most that
4 you recall making for spending dinner
5 with a gentleman?

6 A. \$1,500.

7 Q. Did you engage in any sexual
8 relations with the gentleman?

9 A. One, yeah, once or twice,
10 but it was on my own accord. It was
11 after that time period had finished.

12 Q. What time period?

13 A. My appointment, my dinner
14 with them.

15 Q. Okay.

16 A. He just happened to be
17 really good looking.

18 MR. GUIRGUIS: It's been
19 about an hour. Maybe we can take
20 five minutes, stretch.

21 MS. MENNINGER: Sure.

22 (Time noted: 10:47 a.m.)

23 (Recess.)

24 (Time noted: 11:05 a.m.)

25 Q. Approximately how many times

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2 do you recall being paid to spend
3 dinner with a gentleman in New York
4 when you were living here in late
5 2006?

6 A. I can't remember.

7 Q. Ten times?

8 MR. GUIRGUIS: Objection.

9 A. It could be, it wasn't --
10 yeah, it could be that. It wasn't
11 really...

12 Q. Apart from that income, did
13 you have any other sources of income?

14 MR. GUIRGUIS: I'm sorry.
15 Off the record for a second.

16 (An off-the-record
17 discussion was held.)

18 MS. MENNINGER: I think
19 there's a question pending.

20 (Requested portion of the
21 record was read back.)

22 A. Yes, I did, yes.

23 Q. What were the other sources?

24 A. Jeffrey Epstein.

25 Q. Any other source?

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2 A. No.

3 Q. Who introduced you to
4 Jeffrey Epstein?

5 A. [REDACTED] [REDACTED]

6 Q. And how did you meet [REDACTED]

7 [REDACTED]

8 A. I met her in a nightclub.

9 Q. Do you know which nightclub?

10 A. I can't remember the exact
11 name. It was a rock club. The owner
12 of the club, his name is [REDACTED] Yeah,
13 his name -- it's quite a well-known
14 club. If you Google the name [REDACTED]
15 you'll find the name. [REDACTED] the
16 nightclub owner; he's quite famous in
17 New York.

18 Q. Do you know where in New
19 York the club is located?

20 A. I can't remember. I don't
21 know the exact location.

22 Q. Were you there socially or
23 were you working?

24 A. Socially.

25 Q. And were you with anyone?

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2 MR. GUIRGUIS: Objection.

3 A. I can't remember. I would
4 have been with an acquaintance or
5 something, but I can't remember who I
6 was with.

7 Q. Were you able to make some
8 friends with people here in New York
9 when you moved here?

10 A. Yes. [REDACTED] [REDACTED]
11 [REDACTED] a girl named [REDACTED] [REDACTED]
12 There were a few other -- I can't
13 remember their -- they weren't close
14 friends, they were just acquaintances.
15 You don't really make friends in New
16 York.

17 Q. Tell me about your meeting
18 of [REDACTED]

19 A. She was a very attractive
20 girl, [REDACTED] I think [REDACTED] Very
21 friendly, very beautiful girl, very --
22 we clicked immediately.

23 Yeah. She approached me. I
24 wasn't -- yeah, I didn't go out of my
25 way to meet any friends in a

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2 nightclub, so -- especially girls.

3 Q. What do you mean, she
4 approached you?

5 A. So when I go to a club, I
6 don't really speak to girls. I speak
7 to guys. So [REDACTED] approached me and
8 came on to me.

9 Q. Where were you?

10 A. In the nightclub.

11 Q. Where in the nightclub?

12 A. I can't -- I can't remember
13 the exact location.

14 Q. Were you at the bar area?
15 On the dance floor? In the bathroom?

16 A. I would say she pretty much
17 hit on me everywhere in the club.

18 Q. Was there a dance floor?

19 A. Yes, there was.

20 Q. Was it a one floor club or
21 two floors?

22 A. I can't remember how many
23 floors.

24 Q. And what did she do to hit
25 on you?

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2 A. She befriended me, she --
3 yeah, she kissed me.

4 Q. Where did she kiss you?

5 A. On the mouth.

6 Q. Anywhere else?

7 A. Can -- is that in general or
8 at that --

9 Q. I'm just talking about the
10 first time you met.

11 A. The first time we met?

12 Q. Right.

13 A. I can't remember if we had
14 sex the first night we met, but we
15 definitely were intimate the first
16 time we met. But I can't remember if
17 we had had sex on that first night.

18 Q. Okay. Was that consensual
19 sex?

20 A. Yes, it was with [REDACTED]
21 [REDACTED]

22 Q. And where did you have
23 consensual sex with [REDACTED]

24 A. In the club the first time.

25 Q. Where in the club?

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2 A. In the owner's office.

3 Q. Was the owner present?

4 A. Yes, the owner was present.

5 Q. [REDACTED]

6 A. Is that -- I don't know his
7 surname, so -- is it -- [REDACTED] -- I can
8 give you a description of [REDACTED] if you
9 want.

10 Q. Sure.

11 A. [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 Q. Okay. So you and [REDACTED]
17 and [REDACTED] had consensual sex in [REDACTED]'s
18 office?

19 MR. GUIRGUIS: Objection.

20 MS. MCCAWLEY: Objection.

21 Q. Is that right?

22 A. That's correct.

23 Q. Did I get that wrong in any
24 way?

25 MR. GUIRGUIS: Here's the

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2 question.

3 A. Yeah, that's correct.

4 Q. Was anyone else present?

5 A. No.

6 Q. Did you have any alcohol
7 that night?

8 A. I did.

9 Q. How much?

10 A. Not enough to forget or
11 black out, so not much. I was able to
12 make decisions.

13 Q. Do you recall what you were
14 wearing?

15 A. No, I don't.

16 Q. Did you have any cocaine
17 that night?

18 A. I don't remember.

19 Q. Did you use cocaine during
20 the fall of 2006?

21 A. Yes, I did.

22 Q. And where did you get that
23 cocaine?

24 A. From [REDACTED] and [REDACTED]

25 Q. Anywhere else?

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2 A. From [REDACTED]'s best friend, a
3 guy named [REDACTED] [REDACTED] I don't
4 know how to spell that.

5 Q. Anywhere else?

6 A. No.

7 Q. Did you pay for any of the
8 cocaine?

9 A. No.

10 Q. Did you use any other
11 controlled substances in the fall of
12 2006?

13 A. No.

14 Q. Did you take any
15 prescriptions in the fall of 2006?

16 A. I did.

17 Q. What did you take?

18 A. Jeffrey's psychiatrist
19 prescribed me lithium, Ritalin, and
20 there was a bipolar description drug
21 that was also prescribed to me by
22 Jeffrey Epstein's psychiatrist. I
23 can't remember the exact name of that
24 bipolar drug. But I was started off
25 with lithium and Ritalin.

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2 Q. Okay. What was the name of
3 the psychiatrist?

4 A. I can't remember her name.

5 Q. It was a woman?

6 A. It was a woman.

7 Q. And where was she located?

8 A. I can't -- I can't remember
9 the exact location of her office.

10 Q. Can you describe the office
11 in any way?

12 A. I can't remember.

13 Q. Did anyone go with you?

14 A. No, I went on my own.

15 Q. Where did you go to get your
16 prescriptions filled?

17 A. A pharmacy near Jeffrey
18 Epstein's apartment that I was living
19 in at the time. I think it was a
20 Duane Reade.

21 Q. Were they in your name?

22 A. Yes, they were.

23 Q. Were you taking these in the
24 fall of 2006 or in 2007 or both?

25 A. Jeffrey first put me in

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2 touch with his psychiatrist, it was
3 before -- it was -- yeah, it was well
4 before December, so it was the fall
5 of -- fall/winter, going into winter
6 2006.

7 Q. Do you recall what month you
8 came to the U.S.?

9 A. It was September 2006.

10 Q. Did you leave and come back
11 in October?

12 A. I think I may have. I may
13 have made a trip to London or like a
14 quick, brief trip.

15 Q. Who paid for that?

16 A. I can't remember.

17 Q. Why did you go back?

18 A. I actually can't even
19 remember why I went back.

20 Q. So you think you came in
21 September?

22 A. I know I came in September.

23 Q. And you said you could stay
24 for three months?

25 A. And then I left the country

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2 briefly for a day and then I came back
3 in again.

4 Q. When did you do that?

5 A. So if you look at my
6 passport when I entered -- you've got
7 my passport. So I arrived on the 1st,
8 I think, of September, and then it was
9 just before the three months were up,
10 and then I left.

11 I think that was the trip
12 that I made to London in -- October,
13 November -- October, November -- yeah,
14 so I was -- I left before the due time
15 that my tourist visa was up, and I
16 spent a summer and came back.

17 Q. Where did you go?

18 A. I think it was London. I
19 went to -- I went to London. And then
20 Jeffrey paid for a flight for me to
21 visit my family in South Africa in
22 February.

23 Q. Okay. So there's two trips
24 to London we're talking about?
25 There's one you went and you came

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2 right back?

3 A. I only recall one trip to
4 London. I didn't really kind of
5 catalog every trip I made. I did a
6 lot of traveling during my time in the
7 U.S., so...

8 Q. Had you traveled a lot
9 before you came to the U.S.?

10 A. Yeah. I spent my whole life
11 traveling.

12 Q. How were you able do that?

13 A. Through savings, through
14 waitressing jobs, that kind of thing.

15 Q. Did your family ever pay for
16 you to go on trips?

17 A. No.

18 Q. Never?

19 A. No.

20 Q. Does your family travel?

21 A. Yeah, they travel. They go
22 on holidays overseas. They go on
23 holidays.

24 Q. So you said you got a
25 passport your whole life, I think you

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2 said, right?

3 A. Well, I can't remember the
4 specific date when -- I was like from
5 3 to 5 when I got my passport. I
6 didn't arrange my passport at 3 years
7 old; my mom kind of did that.

8 So I've always grown up with
9 a British and South African passport.
10 I had dual nationality right from the
11 get-go.

12 Q. Right. So when you were a
13 child, did you travel internationally?

14 A. Yeah, I did, to visit my
15 family in Scotland.

16 Q. And apart from the UK and
17 South Africa, did you go anywhere as a
18 child?

19 A. We went on holidays and
20 Africa. Maybe I went to Scotland to
21 visit my family, yeah, possibly. I
22 don't remember.

23 Q. Okay.

24 A. They weren't photo-happy in
25 my family.

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2 Q. They were what?

3 A. They weren't photo-happy,
4 so...

5 Q. So back in the fall 2006,
6 you were here for three months and
7 then you left --

8 A. Yeah. I didn't want to go
9 over my visa and get in trouble, and I
10 wasn't making much money anyway. And
11 Jeffrey was with FIT, so he was going
12 to organize me a visa so I could stay.

13 So I didn't do anything
14 wrong or illegal with my visa, just to
15 clarify.

16 Q. I understand. I'm just
17 trying to get the timing of when you
18 were here and then you left and then
19 you came back; is that right?

20 A. So the duration that I was
21 here, I arrived in September and I
22 left -- I think it was the 1st of May.

23 So during that time, there
24 was a trip that I made to South Africa
25 to visit my family and there was a

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2 trip to London. I don't recall -- I
3 don't remember any other trips that I
4 made during that duration of time,
5 away from Jeffrey and Ghislaine, if
6 you understand, on my independent own.

7 Q. Right. So if you came in
8 September and you could stay for three
9 months --

10 A. Mm-hmm.

11 Q. So you left in December?

12 MS. MCCAWLEY: Objection,
13 asked and answered.

14 A. September, October,
15 November. Yeah, I did -- I did make a
16 trip to -- I don't recall the specific
17 dates, but I did make a trip to London
18 and I did make a trip to South Africa
19 in February. So I don't...

20 Q. Did you go from London to
21 South Africa?

22 A. I don't remember the exact
23 trip itinerary. But, yeah, I flew to
24 South Africa on a plane.

25 Q. From London?

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2 A. From New York.

3 Q. Okay. So you recall having
4 been on two trips independently
5 between September 2006 and May 2007,
6 right? One to London and one to South
7 Africa?

8 A. Yeah, that's correct.

9 Q. And the one to London, you
10 recall being a brief trip to then
11 allow you to stay in the country
12 longer?

13 A. I don't remember why I went.
14 I don't even remember the trip, okay?
15 I really don't recall. I probably
16 visited my mom or -- or whatever. I
17 just know that I made two trips during
18 that duration and I know that I did
19 not over go the three-month thing. So
20 I made those for those specific
21 reasons.

22 Q. Okay.

23 A. But those -- I just wanted
24 to make clear that those were the only
25 two trips I made independently without

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2 Jeffrey aiding, and I would like to
3 make that clear. I made multiple
4 trips with Jeffrey, so independently I
5 did those two.

6 Q. Were any of your trips with
7 Jeffrey international?

8 A. No.

9 Q. Can you tell me when in your
10 stay in the U.S. you initially met

11 [REDACTED]

12 A. It was pretty soon after I
13 arrived. I can't remember the exact
14 time frame. I think it was about
15 maybe two, three weeks after I
16 arrived.

17 Q. Were you living at [REDACTED]'s?

18 A. Yes.

19 Q. Did you consider yourself in
20 a relationship with [REDACTED]

21 A. No, we were just having fun.
22 And she was -- she was really
23 friendly, and I didn't know anyone in
24 New York, so -- and, you know, I
25 wanted to make friends. She was a

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2 girl and was just very friendly,
3 pretty.

4 Q. Was she also involved in the
5 fashion industry at all?

6 A. I don't recall. I just
7 recall her working for Jeffrey.

8 Q. What did you observe her
9 doing for Jeffrey?

10 A. The exact same thing she did
11 with me. She recruited me and was
12 paid for it.

13 Q. Okay. Did you see her get
14 paid?

15 A. No.

16 Q. How do you know she got
17 paid?

18 A. The girls told me.

19 Q. Who were the girls?

20 A. I can't remember their
21 names.

22 Q. Okay. So the girls told
23 you're that [REDACTED] got paid by
24 Jeffrey?

25 A. That's correct.

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2 Q. So what did you see [REDACTED]
3 do for Jeffrey?

4 A. Well, she recruited me. I
5 think she recruited other girls for
6 Jeffrey.

7 Q. Did you see her do that?

8 A. No, but I met some of the
9 other girls that had been introduced
10 to Jeffrey and Ghislaine via [REDACTED]

11 Q. Got it.

12 So you were recruited by
13 [REDACTED] correct? Yes or no.

14 A. Yes.

15 Q. And you met other girls who
16 knew [REDACTED] and Jeffrey, correct?

17 A. Well, all the girls knew
18 each other, really. All the girls
19 kind of...

20 Q. Are these the same girls
21 that are in the apartment building or
22 a different set of girls?

23 A. Different set of girls.

24 Q. Okay.

25 A. You know, there was a

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2 constant flow of women, girls.

3 Q. So where did you see these
4 other girls?

5 A. In Manhattan, with Jeffrey,
6 a few social occasions that we went
7 on, the island. On the plane, Jeffrey
8 Epstein's plane. I met girls
9 everywhere -- every time I went with
10 Jeffrey. Well, not every time, but he
11 was always surrounded by new girls. I
12 couldn't keep up with the names, to be
13 honest. That's why I can't remember
14 any of them.

15 Q. Getting back to [REDACTED] you
16 met her at the nightclub?

17 A. Mm-hmm.

18 Q. Did she work as a model at
19 all?

20 A. I wasn't quite clear what
21 she actually did, to be honest. I
22 have absolutely no idea.

23 Q. Do you know where she lived?

24 A. No, I didn't. I don't know
25 where she lives.

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2 Q. Did you ever go to her
3 apartment?

4 A. No.

5 Q. When is the last time you
6 talked to her?

7 A. I haven't -- I think before
8 I left New York.

9 Q. Did you have a cell phone
10 when you were in New York?

11 A. Yes, I did.

12 Q. Do you recall who your cell
13 phone provider was?

14 A. I don't remember.

15 Q. Do you know your cell phone
16 number?

17 A. No, I have no idea.

18 Q. When you were living in New
19 York, were your parents living in
20 South Africa?

21 A. My dad was living in South
22 Africa, my mom was in the UK.

23 Q. Can you tell me about your
24 first conversation with [REDACTED]

25 A. I can't remember my first

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2 conversation with her.

3 Q. Can you remember any
4 conversation with her?

5 A. Yeah, I can. I can remember
6 chatting. She was my friend. I mean,
7 we spoke about everything. We spoke
8 about life with Jeffrey, we spoke
9 about Ghislaine, we spoke about the
10 other girls, we spoke about [REDACTED] [REDACTED]
11 was a really nice girl as well. Like,
12 we often got coffee with each other,
13 lunches, dinners.

14 Q. Okay. Do you remember any
15 specifics of your conversations?

16 MS. MCCAWLEY: Objection,
17 asked and answered.

18 A. We spoke very frequently
19 about the faces Jeffrey used to pull
20 when he used to masturbate over the
21 girls, which was quite funny.

22 We spoke about Ghislaine
23 quite a lot and what a monster she
24 was. She's really not a nice person,
25 so -- yeah, I mean, we spoke about

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2 them a lot, actually.

3 Q. Okay. So you spoke about
4 the faces Jeffrey made when he
5 masturbates over the girls?

6 A. And the way he spits on his
7 hand when he masturbates. It's really
8 gross. It's quite funny.

9 Q. Any other conversations with
10 [REDACTED] that you remember?

11 A. I remember I didn't really
12 get on with Ghislaine. As I said,
13 she's -- in my opinion, she's not a
14 nice person. I didn't really get her.

15 And Jeffrey Epstein promised
16 me a -- going to FIT. So we
17 frequently spoke about just everyday
18 things, you know.

19 [REDACTED] and I -- [REDACTED]
20 really -- Jeffrey Epstein and I once
21 had a fight and [REDACTED] patched things
22 up between us, because I didn't want
23 to speak to Jeffrey anymore.

24 I often spoke to [REDACTED]
25 about why Ghislaine didn't like me and

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2 why the other girls didn't like me:
3 [REDACTED] didn't like me, Ghislaine didn't
4 like me, [REDACTED] [REDACTED] definitely
5 didn't like me. Yeah, that kind of
6 stuff.

7 Q. How is it that you came to
8 meet Jeffrey Epstein?

9 A. Through [REDACTED]

10 Q. Tell me about that.

11 A. I first met Jeffrey --
12 [REDACTED] introduced me to Jeffrey. She
13 kind of described him to me. She knew
14 I wanted to go back to school to get a
15 degree, and I was really battling
16 financially because at that time I
17 wasn't really modeling material.

18 So, yeah, she told me about
19 this guy who was really wealthy, a
20 philanthropist, you know, really
21 enjoyed -- you know, he really cares
22 about people and he really wants to
23 help them, and he was a really good,
24 decent guy.

25 Then we -- he was helping

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2 her at that time, as well as [REDACTED] and
3 other girls.

4 Q. That's what she told you?

5 A. Yes.

6 Q. Where were you when [REDACTED]
7 was describing Jeffrey?

8 A. I can't remember the
9 location, but -- I mean, she first
10 described Jeffrey -- I think it was
11 the second time we met, because I had
12 discussed with her that I was
13 struggling financially because my
14 modeling career hadn't really taken
15 off as I had hoped, so I was -- yeah,
16 she wanted to help.

17 Q. And you don't remember where
18 you had this conversation?

19 A. No, not specifically the
20 exact location.

21 Q. Was it in person or over the
22 phone?

23 A. It was in person.

24 Q. Was anybody else there?

25 A. I think [REDACTED] could have been

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2 there, [REDACTED] [REDACTED] could have been
3 there, a few other people could have
4 been there. Various people. She was
5 quite open about it.

6 Q. And do you know when this
7 was in the fall of 2006?

8 A. It was very close to after I
9 had first arrived, so it was quite
10 soon after I arrived. I don't know
11 specifically if it was three weeks or
12 two weeks, but it was quite soon after
13 I first got to...

14 Q. Okay. So did you meet
15 Jeffrey? Did you agree to meet
16 Jeffrey? What happened next?

17 MR. GUIRGUIS: Objection to
18 form.

19 Q. What happened next?

20 MR. GUIRGUIS: Objection to
21 that one too.

22 A. I agreed to -- yeah, I met
23 Jeffrey.

24 Q. How?

25 A. We went to -- the first

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2 meeting I had with Jeffrey was at the
3 cinema. There were about ten other
4 girls with him.

5 Q. How did that meeting get
6 arranged?

7 A. [REDACTED] arranged it, and
8 said she had spoken to Jeffrey and
9 Jeffrey wanted to meet me.

10 Q. And what movie did you see?

11 A. I can't remember what movie
12 it was.

13 Q. Did you sit with him?

14 A. Yes, I did.

15 Q. Next to him?

16 A. I can't remember if it was
17 next to him, but I was close by him.

18 Q. You, [REDACTED] ten other
19 girls and Jeffrey?

20 A. I don't know if it was
21 exactly ten, but there were -- there
22 were many other girls there. There
23 was like a big group of us.

24 Q. And where was the theater?

25 A. I can't remember the exact

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2 location, but it was quite a
3 prominent -- it was a big cinema. It
4 was like a huge -- like one of your
5 main cinemas. Somewhere -- is there a
6 cinema on Lexington, maybe?

7 I don't know. Sorry.
8 Navigation isn't in my strong points.
9 I'm going to stop speculating. I'm
10 sorry, okay? I said it for you. I
11 don't know.

12 Q. It was somewhere in New
13 York?

14 A. It was in New York.

15 Q. And you went with [REDACTED]

16 A. Yes.

17 Q. How did you go?

18 A. By cab.

19 Q. From your apartment with

20 [REDACTED]

21 A. Yes.

22 Q. And tell me about your
23 experience at the cinema?

24 A. I bought popcorn and sweets
25 and juice, and I had an awesome time

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2 watching the movie with a bunch of new
3 people.

4 Q. And you do not remember the
5 name of the movie?

6 MR. GUIRGUIS: Objection.

7 A. No.

8 Q. And what happened after the
9 movie was over?

10 MR. GUIRGUIS: Objection.

11 A. I got in a taxi.

12 Q. And?

13 MR. GUIRGUIS: Objection.

14 MS. MENNINGER: What's the
15 objection?

16 MR. GUIRGUIS: The question
17 and, objection to form. That's a
18 good objection.

19 A. I went home.

20 Q. When was the next time you
21 met Jeffrey?

22 A. I can't remember specific --
23 I can't remember -- I think I met
24 him -- again, I'm not trying to
25 speculate. I think I met him in New

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2 York again. I can't remember that
3 meeting. I then met him again on his
4 private plane.

5 Q. So you believe the third
6 time you met him was on the private
7 plane?

8 A. That's correct.

9 Q. And do you remember anything
10 about the second time you met him?

11 A. No, I can't remember.

12 Q. And do you know how long
13 after the first time you met him the
14 second time was?

15 A. Pretty soon after.

16 Q. What does that mean to you?

17 A. Couple days.

18 Q. Where did you meet him that
19 second time?

20 A. In New York.

21 Q. Where?

22 A. I can't remember.

23 Q. At his house?

24 A. No, it wasn't at his house.

25 Q. Was anyone else there the

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2 second time you met him?

3 A. [REDACTED]

4 Q. Anyone else?

5 A. No, not that I recall.

6 Q. Anything memorable about
7 that event?

8 A. Nothing, nothing memorable.

9 Q. Anything sexual happen at
10 the second meeting?

11 A. No.

12 Q. At the first meeting?

13 A. No.

14 Q. How did the flight meeting
15 become arranged, if you know?

16 A. So it was pretty a
17 last-minute thing. [REDACTED] phoned me
18 up and said that Jeffrey Epstein would
19 very much like to have me go to his
20 island. It was going to be so much
21 fun, it was going to be a girls' week,
22 there were lots of other girls going,
23 we were going to have so much fun,
24 etcetera, etcetera, etcetera.

25 Q. And what did you do?

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2 MR. GUIRGUIS: Objection.

3 A. I went on the -- I went with
4 them to the island.

5 Q. Where was the plane located?

6 A. I can't remember the exact
7 airport. I think it was either Newark
8 or JFK.

9 Q. Did you fly commercially or
10 private?

11 A. Private.

12 Q. Was it Jeffrey's plane?

13 A. Yes.

14 Q. Who else was on the plane?

15 A. ████████ ██████████ -- I would
16 like to say ██████████ but I can't remember
17 her specifically being there on the
18 first trip, so... ██████████ and ██████████
19 were definitely there.

20 Q. Had you met ██████████ before?

21 A. No.

22 Q. And you don't remember
23 anyone else?

24 A. No, it was -- I mean, there
25 were always new people around Jeffrey

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2 and Ghislaine, so I don't really --

3 Q. Well, you just said and
4 Ghislaine. Was Ghislaine there?

5 A. No, not the first time.

6 Q. And do you recall what month
7 this was?

8 A. I can't remember what month
9 it was.

10 Q. It was sometime during your
11 first three-month period?

12 A. Yeah, it was within that
13 first three months.

14 Q. So sometime between
15 September and December?

16 A. That's correct.

17 Q. And did you have a camera
18 with you when you went?

19 A. I did.

20 Q. Did you take pictures?

21 A. I took a couple.

22 Q. Describe for me what
23 happened on the plane ride?

24 A. ██████ walked in, sat down in
25 front of me, ██████ We all buckled

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2 up, we took off.

3 The rest of the passengers
4 in the -- I think it's towards the
5 front of the plane where all the seats
6 are -- we all -- all the guests
7 were -- fell asleep. I pretended to
8 be asleep.

9 Jeffrey then went -- Jeffrey
10 went to his -- was in his bed on the
11 plane, having open sex with [REDACTED] for
12 everyone to see, on display.

13 Q. Did you participate in that
14 sex at all?

15 A. No, I didn't.

16 Q. Did anyone ask you to?

17 A. No.

18 Q. Did you and [REDACTED] have any
19 sexual relationship on that plane, the
20 first plane ride?

21 A. No.

22 Q. Were you still having an
23 occasional sexual relationship with
24 [REDACTED] at that time?

25 MS. MCCAWLEY: Objection.

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2 A. I can't remember.

3 Q. What types of sexual
4 relationship did Jeffrey and [REDACTED]
5 have on the plane in your presence?

6 A. Well, [REDACTED] was straddling
7 Jeffrey for quite some time. I
8 watched them both ejaculate with each
9 other. They were having quite a good
10 time together.

11 Q. How long was the plane ride?

12 A. Gosh, a few hours. Few
13 hours.

14 Q. Did you say anything?

15 A. No. I was a guest. I
16 thought it would be quite
17 inappropriate.

18 Q. All right. Can if I ask you
19 if you could just draw a layout of the
20 plane?

21 I'm going to reach over?

22 Just kind of describe where
23 everyone was sitting and the bed area.

24 A. I don't remember if it was
25 the back or front. The front of the

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2 plane, I think there was a round --
3 there was, like, a round bed at the
4 back of the plane.

5 There was seating. Pilots
6 are there. [REDACTED] walked in with her
7 Louis Vuitton handbag. She sat there
8 in front of me at the side of the
9 plane. So there was seating here.

10 Q. Can you just write [REDACTED]
11 next to that --

12 A. Okay.

13 Q. -- so I will remember later.

14 A. [REDACTED] sat there when she
15 first walked in. And I remember her
16 specifically with a Louis Vuitton
17 handbag that she had, a black one.

18 Q. Okay. And where were you
19 sitting?

20 A. I was sitting opposite her.
21 And then I think we changed positions
22 or there was -- I just remember at the
23 front, there was seating here, okay.

24 Q. Well, where was [REDACTED]
25 sitting?

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2 A. I don't remember where she
3 was sitting.

4 Q. Can you just put where the
5 other seats were, if you don't
6 remember who was in them?

7 A. I remember there was seating
8 here. I think there was -- I'm
9 speculating here, but I can't remember
10 if they were sitting on the -- on the
11 other side of the plane. I can't -- I
12 just remember that I sat on a seat in
13 the front of the plane and there were
14 people opposite me.

15 Q. When you say opposite, do
16 you mean in front and back of you or
17 are you saying to your sides?

18 A. In front of me.

19 Q. Okay.

20 A. So it's like a seating --

21 Q. Is it one seat in a row?

22 A. I can't remember the
23 specific layout of the seating on the
24 aircraft, but I know that there's a
25 big, fat, round open -- there's a bed

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2 on the back of the plane --

3 Q. Okay.

4 A. -- which there's no door, so
5 you can quite easily have sex and show
6 the whole plane. Which is how it's
7 designed, I'm guessing.

8 Q. Okay.

9 A. Because there's no privacy
10 around the bed.

11 Q. I understand.

12 Can you just draw where the
13 other seats are, though?

14 MS. MCCAWLEY: Objection,
15 asked and answered.

16 A. I don't remember where the
17 other seats are. I remember me
18 sitting in a specific airplane seat at
19 the beginning, you know, at the front
20 of the plane. I don't remember the
21 decor of the plane. I remember there
22 was a bed. It was open, it was open
23 plan.

24 Q. Were there bathrooms on the
25 plane?

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2 A. Yes.

3 Q. Where were they?

4 A. I can't remember where the
5 bathrooms were located on the
6 aircraft.

7 Q. Do you know what kind of
8 plane it was?

9 A. It was a nice, big plane.
10 Yeah, it was a plane. A plane.

11 Q. Had you been on a private
12 plane before?

13 A. No.

14 Q. Do you know how many people
15 it carried?

16 A. I just know it's a plane.

17 MS. MENNINGER: Can we mark
18 that. Can you mark that as
19 Defendant's Exhibit 1.

20 MR. GUIRGUIS: Have you seen
21 it before you want to mark it?

22 THE WITNESS: It's really
23 bad. Do you want me to redraw
24 that? It's really embarrassing.
25 I'm not an artist or anything.

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2 It's really bad.

3 MR. GUIRGUIS: Just hand it
4 over.

5 (Defendant's Exhibit 1,
6 hand-drawn picture marked for
7 identification.)

8 Q. Was there a kitchen on the
9 plane that you recall?

10 A. I can't remember any, no.

11 Q. Was there an office area?

12 A. I can't remember the layout
13 of the plane. I remember the bed.
14 The only thing I remember is the
15 open-plan bed where I watched [REDACTED]
16 and Jeffrey have sex.

17 Q. Apart from the Louis Vuitton
18 bag, do you remember what [REDACTED] was
19 wearing?

20 A. I just remember she had a
21 black Louis Vuitton handbag. And I
22 don't remember what she was wearing,
23 no. But I remember the black handbag
24 because I liked it so much, I bought
25 the red-colored version a few years

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2 later. It was really nice.

3 Q. How long did you stay on the
4 island during this first trip?

5 A. A few days.

6 Q. Was it a week or two days?

7 A. I can't remember.

8 Q. Apart from [REDACTED] [REDACTED]
9 Jeffrey and yourself, is there anyone
10 else you recall being on that first
11 trip?

12 MR. GUIRGUIS: Objection.

13 A. On that particular first
14 trip, I can't remember. I just
15 remember [REDACTED] [REDACTED] Jeffrey,
16 myself on the first trip.

17 Q. When you got to the island,
18 was there anyone there?

19 A. Yes. There was a lovely
20 couple from Zimbabwe, somewhere in
21 Africa. I think they were either
22 South African or from Zimbabwe, but
23 they was a lovely middle-age couple.
24 Chef, like staff, really nice staff on
25 the island.

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2 Q. Any other guests?

3 A. No, not that first trip.

4 Q. Did you engage in any sexual
5 acts with Jeffrey Epstein on your
6 first trip?

7 A. Yes.

8 Q. What happened?

9 MR. GUIRGUIS: Objection.

10 A. It was -- I had to give him
11 a massage in his bedroom.

12 Q. And how did that come about?

13 A. So the entire basics were
14 explained to me, there's this wealthy
15 dude, this philanthropist, loves
16 women, loves getting massages. And
17 this was a nice way to make extra
18 cash, which is great.

19 I got to the island -- ■■■, I
20 was made to massage Jeffrey on the
21 plane. Sorry. That's where I gave my
22 first massage to Jeffrey.

23 So my first massage started
24 with him on the plane, with his feet
25 and his hands. And on that trip I

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2 was -- I had to give him other
3 massages, like legs, arms, feet,
4 hands, head, shoulders. And it wasn't
5 straight away, but they got more
6 sexual. Then I was called to his
7 bedroom.

8 Q. Okay. I just want to make
9 sure we're talking about the same time
10 frame.

11 There was a massage you gave
12 on the plane on the way down there?

13 A. Yes.

14 Q. That was not sexual?

15 A. That was not sexual, no.

16 Q. Was that before or after he
17 was having sex with [REDACTED] in the open
18 bed in the plane area?

19 A. It was before. It was
20 before they had sex, because we all
21 fell asleep.

22 Q. Okay. And then how did the
23 massage come about?

24 A. On the island or --

25 Q. No, on the plane. Just on

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2 the plane.

3 A. Jeffrey asked me to massage
4 him.

5 Q. So you were asleep and
6 Jeffrey woke you up?

7 MS. MCCAWLEY: Objection.

8 A. When we first got on the
9 plane, we sat down. You know, like
10 when you first get on an airplane, you
11 settle in and chat, chat, chat. And I
12 massaged him, and then it was after
13 that we find of all fell asleep. And
14 then I woke up and I saw Jeffrey and
15 ██████████

16 Q. Okay.

17 A. So in that effect, I was
18 probably sitting -- I was facing the
19 bed.

20 Q. You were rear-facing?

21 A. Yeah.

22 Q. Can I just hand you back
23 Defendant's Exhibit 1. Is it still,
24 in your recollection, the same place?

25 A. Yeah. We switched seats a

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2 few times.

3 Q. So where was Jeffrey when
4 you gave him the massage on the
5 airplane?

6 A. He was -- he was seated at
7 the front.

8 Q. In front of where you were?

9 A. We weren't really all seated
10 throughout the entire duration of the
11 flight. So as soon as the flight took
12 up, we took our seat belts off and
13 kind of moved around freely, because
14 it's not a commercial flight. You can
15 do that on private planes. So we
16 weren't in our seats the whole time.
17 There was a lot of moving around.

18 Q. Okay. Can you just draw on
19 Defendant's Exhibit 1 where he was
20 when you gave him the massage?

21 A. I can't remember where
22 specifically on what seat or where I
23 was facing that I gave Jeffrey his
24 massage, so I'm not comfortable
25 putting something because that's

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2 speculating.

3 Q. Do you have a general area
4 at all? Was it in the front area?

5 A. The general area -- the
6 general area here is at the front of
7 the plane, and then the bed at the
8 back of the plane.

9 Q. So which of those two
10 general areas was the massage?

11 A. So the massage was at the
12 front, because I didn't give him it on
13 the bed; it was in the front of the
14 plane. I don't remember what specific
15 seat plan I gave him a massage.

16 Q. Was he wearing clothes?

17 A. Yes.

18 Q. During the whole massage?

19 A. During the whole massage,
20 yes.

21 Q. What was he wearing?

22 A. I don't remember.

23 Q. Did he have on shoes?

24 A. Yes, he had on shoes when he
25 walked onto the plane. But then he

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2 took his shoes off to have the
3 massage.

4 Q. And do you recall what he
5 said when he asked you to give him a
6 massage?

7 A. Yes. He asked me to massage
8 his feet and massage him.

9 Q. Were you surprised by that
10 request?

11 A. No.

12 Q. Why not?

13 A. Because [REDACTED] told me that
14 he liked getting massages from girls
15 and that he paid for them.

16 Q. Did he pay you for that
17 massage on the plane?

18 A. No.

19 Q. Did you expect him to?

20 A. Well it was a -- it was the
21 beginning of the trip, so I'm hardly
22 going to go, I don't really know you.
23 Can you please pay me. It's not
24 something you really discuss, I don't
25 think. It's not really appropriate.

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2 It's not very businesslike.

3 Q. And you were clothed during
4 the massage on the plane?

5 A. Yes.

6 Q. Where was the second
7 massage?

8 A. On his island.

9 Q. Where on the island?

10 A. So the second time I
11 massaged him was probably on -- it
12 was -- I was then asked to massage him
13 again later that day, to massage him
14 again in the open-planned seating area
15 on the island.

16 Q. Who asked you to do that?

17 A. ████████████████████

18 Q. So ██████████ ██████████ was on the
19 island?

20 A. Yes.

21 Q. Did she travel with you?

22 A. Not all -- I can't remember
23 specifically who traveling -- I can't
24 say that I a hundred percent remember
25 her there on that first flight. I

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2 don't -- I can't visually see her
3 there. But I know that she traveled
4 with us pretty much every time with
5 Jeffrey. She traveled everywhere with
6 Jeffrey.

7 Q. How many times did you go to
8 the island?

9 A. Several.

10 Q. How many?

11 A. Several. Several times.

12 There were multiple occasions that I
13 went to the island.

14 Q. Three times?

15 A. Several. Several. I can't
16 remember how many times specifically.

17 Q. I understand you don't have
18 a specific answer.

19 A. Yeah.

20 Q. Do you believe it was more
21 than ten times?

22 A. I don't think it was as much
23 as ten times, no. Maybe a little bit
24 less, but not that many.

25 Q. Do you know how many times

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2 you went on the private plane versus a
3 commercial plane?

4 A. I flew both, so I can't
5 remember how many times I did
6 commercial, how many times I did
7 private. I mean, it was -- I know
8 that I did fly commercially at some
9 times when the plane wasn't available.

10 Q. And the total number of
11 trips to the island you think was less
12 than ten times?

13 MR. GUIRGUIS: Objection.

14 A. There was several times.
15 I'm not sure if it was more than ten.
16 I don't know the accurate number. It
17 was several times.

18 Q. Did you go through any type
19 of passport control when you went to
20 the island at all?

21 A. No, they didn't check
22 passports.

23 Q. How did you get from where
24 the plane landed to the island?

25 A. Jeffrey's speedboat.

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2 Q. Was that the only method?

3 A. Also a helicopter.

4 Q. Who flew the helicopter?

5 A. I don't -- a guy.

6 Q. Was he cute?

7 MR. GUIRGUIS: Objection.

8 A. I don't remember.

9 MR. GUIRGUIS: Objection,
10 and I direct the witness not to
11 answer.

12 MS. MENNINGER: I'm learning
13 about superyachting. I thought I
14 would find out about the
15 helicopter.

16 MR. GUIRGUIS: I thought you
17 were going to ask if he was
18 taller than 6 feet or less than 6
19 feet. I thought that was the
20 next series of questions.

21 Q. So you said the second
22 massage you gave Jeffrey was on the
23 island the same day you flew down
24 there the first time?

25 A. Yes.

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2 Q. And it was in the open-plan
3 area?

4 A. Yes.

5 Q. And you recall [REDACTED] [REDACTED]
6 being the one to ask you to give the
7 message?

8 A. We were all sitting there
9 socially. Jeffrey asked me. And that
10 wasn't a sexual massage in the seating
11 area on the island, the second
12 massage. He was still training me to
13 massage, so my standards weren't quite
14 high enough.

15 Q. How did he train you to
16 massage him?

17 A. He let the girls massage me
18 in front of him. He showed me how
19 to -- because his body's full of
20 knots, so -- and he likes his massage
21 really hard. So when you really push
22 on those knots that he has, you have
23 to be quite firm with him.

24 Q. So he told you what he
25 liked?

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2 A. Yes, yeah. And some of the
3 other girls -- sorry. [REDACTED] showed
4 me how he like his massages.

5 Q. Was he clothed during the
6 second massage?

7 A. Yes.

8 Q. Were you clothed?

9 A. Yes.

10 Q. Did any sexual contact occur
11 on the second massage?

12 A. No.

13 Q. When do you recall there
14 being a third massage?

15 A. The next day.

16 Q. And what happened that gave
17 rise to the third massage?

18 A. I was called to Jeffrey's
19 bedroom to massage him.

20 Q. Who called you?

21 A. I'm -- I don't want to
22 speculate, so I can't remember
23 specifically who called me.

24 Q. Okay. So some third person
25 you don't recall --

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2 A. It was a female. It was
3 either [REDACTED] or [REDACTED] so I
4 can't remember which of the two that
5 called me, because they called me many
6 times during the duration of my trip.

7 Q. So when you say called me,
8 what does that mean?

9 A. They come up to me and say,
10 please go to Jeffrey's bedroom and
11 massage Jeffrey. He is waiting for
12 you.

13 Q. What time of day was it?

14 A. I think it was -- I can't
15 remember what specific time of day it
16 was.

17 Q. Can you kind of describe the
18 island for me. Were there more than
19 one building on it?

20 A. Yeah, there were multiple
21 buildings. You had the main house.
22 You had certain accommodation areas
23 where the girls sit.

24 There were various buildings
25 around the island where he used to

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2 have all -- him and his other guests,
3 like beds and beds, like little
4 shelter things where him and his
5 guests used to have sex with the
6 girls, like beds set up for instant
7 sexual entertainment. So --

8 Q. On a beach area?

9 A. All over the island. All
10 over the island. So if you go on one
11 of his quad bikes and do a tour of his
12 island, which I'm sure you guys have
13 done, you will see multiple buildings
14 around the island.

15 Q. And where were you staying
16 during this first trip?

17 A. I was staying in one of the
18 guest houses that [REDACTED] -- the main
19 guest house that all the girls shared.

20 Q. Were you staying in your own
21 room?

22 A. No.

23 Q. Who were you sharing a room
24 with?

25 A. [REDACTED] I think [REDACTED]

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2 slept in the bungalow; she didn't stay
3 there per se. She was explained to be
4 Jeffrey Epstein's girlfriend at the
5 time.

6 Q. When you were asked to give
7 Jeffrey a massage on the third
8 occasion by a female, do you recall
9 what words were used?

10 A. I can't remember the exact
11 words, no. But I was -- it was
12 generally -- it was, can you please go
13 and give Jeffrey -- it's kind of like
14 your turn type of thing.

15 Q. Did you know where his
16 bedroom was?

17 A. I was shown to his bedroom.

18 Q. Who showed you to his
19 bedroom?

20 A. I can't remember who showed
21 me to his bedroom.

22 Q. All right. Tell me what
23 happened during the third massage?

24 A. So I went into Jeffrey
25 Epstein's bedroom. His bedroom is

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2 ice-cold; it's always ice-cold. He
3 likes his bedrooms very well air
4 conditioned.

5 There was a massage table
6 laid out in his bedroom. He asked me
7 to undress and that he wanted to give
8 me a massage, and he asked me to lay
9 on the table. He then started
10 touching my body.

11 I was -- I was -- it didn't
12 start off as a sexual massage; it was
13 just -- you know, it was just doing a
14 normal massage, and then he started to
15 touch me. He touched my vaginal
16 region and he touched me all over.

17 Q. Were you draped with a
18 towel?

19 A. No.

20 Q. For no part of the massage?

21 A. For the -- I can't remember.

22 Q. Was anyone else present in
23 the room?

24 A. No.

25 Q. And after he started

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2 touching you while you were on the
3 table, did you give him a massage?

4 A. I can't remember the
5 specific sequence of events, but I
6 remember the third massage, it wasn't
7 for Jeffrey; it was for me. He
8 performed the massage on me.

9 Q. Did you tell him to stop?

10 A. No, I didn't.

11 Q. Did you have any sexual
12 contact with him?

13 A. No, he just touched me. And
14 he was touching himself too, so...

15 Q. Did you have an orgasm?

16 A. I did have an orgasm. He
17 used a specific vibrator on me, which
18 it was quite hard not to.

19 Q. Can you describe it?

20 A. Yeah. It's quite big. It's
21 not an actual vibrator. It's really
22 good; you should get one if you don't.

23 THE WITNESS: Sorry. I'm
24 allowed to talk. Okay. Sorry.

25 A. It's -- I'll -- can I draw

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2 it? Can I draw it? I'll draw you the
3 exact -- I can actually get you -- I
4 actually own one, so I can get you a
5 photo of it, you know. It's also in
6 the pictures in the dentist chair, in
7 one of the photos, so...

8 It's like this.

9 THE WITNESS: I'm sorry.

10 MR. GUIRGUIS: You're fine.

11 MS. MCCAWLEY: You're fine.

12 A. So it's actually a massager
13 for shoulders. It's got a long base.
14 It's got quite a -- it's got like a
15 rubber [REDACTED] head.

16 And, yeah, it was really --
17 it's not -- it's not used for sexual
18 purposes.

19 Q. It's not?

20 A. No, that's what I'm saying.
21 It's not a vibrator.

22 Q. Okay.

23 A. It was actually quite
24 painful for me --

25 Q. Okay.

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2 A. -- actually.

3 Q. Okay. Did you tell him to
4 stop?

5 A. I told him to stop when
6 he -- because he pressed the vibrator
7 head on my clitoris and it was
8 incredibly painful. It hurt me.
9 That's a very sensitive area, and the
10 strength of this specific device he
11 used is -- it's not really meant for
12 that.

13 Q. Right. Did he stop when you
14 said stop?

15 A. No.

16 Q. And how long did this
17 message --

18 A. Until -- until I orgasmed.

19 Q. And then what happened?

20 A. He just stopped. And I got
21 dressed and I left.

22 Q. Was there any discussion?

23 A. No.

24 Q. Did he give you any money?

25 A. No.

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2 MR. GUIRGUIS: Can we stop
3 for a moment? The witness is
4 crying. I think maybe we should
5 take a moment, have a moment.

6 MS. MENNINGER: Okay. Mark
7 that as Defendant's Exhibit 2,
8 and then we'll take a break for
9 ten minutes.

10 (Defendant's Exhibit 2,
11 hand-drawn picture, was marked
12 for identification.)

13 (Time noted: 12:07 p.m.)

14 (Recess.)

15 (Time noted: 12:19 p.m.)

16 Q. So you just described for
17 us, I think, what you recall being the
18 third massage with Jeffrey?

19 A. Yeah.

20 Q. Do you recall the next one
21 after that?

22 A. It was -- it was basically
23 the same. I was called to give
24 Jeffrey massages.

25 Q. During that first trip to

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2 the island?

3 A. During the first trip, yeah.

4 Q. Can you approximate how many
5 messages you gave to him during that
6 first trip?

7 A. I would give him up to maybe
8 two a day. The other girls, they had
9 to also give him massages during that
10 trip.

11 Q. And you don't remember how
12 many days that trip was?

13 A. No, not specifically how
14 many. It was a few days. It was a
15 few days.

16 Q. At some point did the
17 messages become different than the one
18 you just described as the third
19 message?

20 A. It was either Jeffrey lying
21 on the massage -- me massaging him and
22 it turning sexual or vice versa.
23 Pretty much from the third sexual
24 massage I had with Jeffrey, all other
25 messages were sexual.

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2 Q. Do you recall who was on the
3 flight home from the first trip?

4 A. I don't recall who was on
5 the flight home. I think it was all
6 the people that were on the first
7 flight there.

8 Q. Did you receive any
9 compensation from Jeffrey during that
10 first trip?

11 A. I received like \$300 or
12 something. Not a lot.

13 Q. When did you get that?

14 A. At the end of the trip.

15 Q. How was it given to you?

16 A. In cash.

17 Q. By whom?

18 A. That specific time it was
19 Jeffrey.

20 Q. Where were you when he gave
21 that you money?

22 A. I can't recall where I was
23 when he gave me the cash.

24 Q. Did -- were you still with
25 the other females that had been on the

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2 plane?

3 A. When he gave me the cash?

4 Q. Yes.

5 A. I can't recall. I don't
6 remember if someone was with me. But
7 we all knew that we were going to get
8 cash.

9 Q. Did you see him give cash to
10 anyone else?

11 A. I saw him give cash to

12 [REDACTED]

13 Q. How much did he give her, if
14 you know?

15 A. I don't know.

16 Q. Did you see [REDACTED] having
17 any type of sexual relations with
18 Jeffrey during the trip?

19 A. Yes, I did.

20 Q. When did you see that?

21 A. I didn't see it in the
22 bedroom, but we were called on, like,
23 a rotation visit for Jeffrey
24 throughout the day and evening.

25 Q. When did you see [REDACTED]

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2 having some type of sexual
3 relationship with Jeffrey on the
4 island during the first trip?

5 A. I didn't see her perform
6 sexual acts on Jeffrey.

7 Q. Did anyone see you
8 performing sexual acts on Jeffrey
9 during the first trip to the island?

10 A. No.

11 Q. Did you tell any of these
12 other women about what was going on
13 during your massages with Jeffrey?

14 A. Yes.

15 Q. Who did you tell?

16 A. All the girls that were
17 there.

18 Q. And, again, that is [REDACTED]
19 [REDACTED] and [REDACTED]

20 MR. GUIRGUIS: Objection.

21 Q. Do you remember?

22 A. I can't say specifically if
23 [REDACTED] was there. I can't remember [REDACTED]
24 being there, so I don't like to bring
25 [REDACTED] into the first trip.

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2 I saw her multiple times on
3 the island, but I can't specifically
4 place her there on the first trip. I
5 just remember the key people that were
6 there because they were the most vivid
7 in my memory.

8 Q. Do you know if you took any
9 pictures during that first trip?

10 A. I don't think during that
11 first trip, no. We weren't actually
12 allowed to bring any electronic
13 devices with us.

14 Q. How did you learn that rule?

15 A. ██████ told me and the
16 other girls told me.

17 Q. Who are the other girls?

18 A. ██████

19 Q. Did you take a camera to the
20 island?

21 A. Not the first time, no.

22 Q. Did you have a digital
23 camera at the time?

24 A. Yes, I did.

25 Q. What kind?

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2 A. I can't remember.

3 Q. Did you have a phone with a
4 camera on it?

5 A. I had a BlackBerry, yes,
6 which you could take photos on.

7 Q. All right. Do you recall
8 there being any sexual acts performed
9 on the plane on the ride home during
10 the first trip?

11 A. No.

12 Q. Okay. Do you recall going
13 down a second time?

14 A. To the island?

15 Q. Yes.

16 A. Yes.

17 Q. When did that happen?

18 A. Shortly. I can't remember
19 specifically when it was, but it
20 wasn't on -- I don't know the time
21 length. I saw Jeffrey and Ghislaine
22 and the crowd quite a lot in New York
23 as well, so it's not clear to me when
24 the second trip was.

25 Q. When was the first time you

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2 met Ghislaine?

3 A. I'd been to the island a
4 couple times before, and then I met
5 Ghislaine on the island.

6 Q. Tell me about your meeting
7 with her?

8 A. I remember being told by
9 everyone before she arrived who she
10 was. And I was pretty much told the
11 type of person she was and that I had
12 to do everything she told me to do.

13 Q. Who told that you?

14 A. [REDACTED],
15 [REDACTED] Every single girl that
16 I came in communication with told me
17 that.

18 Q. And what type of person did
19 they tell you that she was?

20 A. She's incredibly
21 intimidating. She's not someone you
22 want to be stuck in an alley at night,
23 put it that way. She's a very
24 dangerous character and has
25 connections.

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2 Q. And that was communicated to
3 you by this group of females: [REDACTED]

4 [REDACTED] [REDACTED] and [REDACTED]

5 A. Yes.

6 Q. Anyone else?

7 A. I mean, it was a general
8 conversation amongst the girls about
9 Ghislaine, so there were other girls
10 all the time. So during the duration
11 of my stay -- so pretty much from
12 my -- when I first arrived in New
13 York, my entire time was spent with
14 Jeffrey and Ghislaine and that crowd.

15 So, yeah, it was -- that's
16 about everything.

17 Q. Okay. So you met --

18 A. I met a lot of girls who we
19 all had the same opinion of Ghislaine;
20 we were all frightened of her. She
21 had a very odd relationship with
22 Jeffrey and -- yeah, she's not a
23 nice -- I'm sorry, I know she's your
24 client, but she's not -- she's not a
25 friendly, warm person.

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2 I liked her dog, though, her
3 Yorkshire Terrier. Her dog was nice.

4 Q. You recall meeting her for
5 the first time on the island?

6 A. Yeah. She flew in by
7 helicopter.

8 Q. And that was after you were
9 on the island a couple of times?

10 A. Yeah.

11 Q. Did she fly the helicopter?

12 A. I can't remember if she flew
13 it or not. I just remember her
14 getting out -- like getting out of
15 a -- and going Ghislaine, and I was
16 like -- I was quite frightened when
17 she arrived, so...

18 Q. Was she alone or with
19 someone?

20 A. I can't remember if she was
21 with someone. I just remember the
22 first time I saw her, I was like, is
23 that it? She didn't look that scary
24 when I first met her. Looks are
25 deceiving.

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2 Q. So the first time you saw
3 her, she was getting off of a
4 helicopter?

5 A. Yeah.

6 Q. And you don't recall if she
7 flew the helicopter?

8 A. I don't recall if she flew
9 it herself or if there was a pilot
10 there. I just remember she arrived on
11 a helicopter.

12 Q. What's the next thing you
13 remember about your interactions with
14 her personally?

15 A. She stayed on the island a
16 few days, and I didn't have a lot of
17 interaction with her. I avoided her,
18 to be honest.

19 Q. Did you take pictures of
20 her?

21 A. No. We weren't allowed any
22 digital cameras on the island.

23 Q. Have you ever taken a
24 picture of her?

25 A. No. I didn't really feel

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2 the need to take pictures of Ghislaine
3 for my photo album.

4 Q. Apart from staying away from
5 her and not having a lot of
6 interactions, do you recall anything
7 else about your first interaction with
8 her on the island?

9 A. Yeah. She was incredibly
10 unpleasant to me. She wasn't friendly
11 or warm.

12 Q. What did she say or do?

13 A. She was very dismissive.
14 Just another girl, really.

15 Q. Did you ever give her a
16 massage?

17 A. No.

18 Q. Did she ever give you a
19 massage?

20 A. She massaged me once or
21 twice, but it was to -- it was to
22 refine my technique for Jeffrey.

23 Q. This was on the first time
24 you met her?

25 A. Yeah, during that trip

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2 she -- because Jeffrey, again, he's
3 quite specific on how he likes his
4 massages and, yeah, I'm not -- that's
5 not my forte, massages.

6 Q. How did it come about that
7 she was helping you to refine your
8 massage techniques?

9 A. We were just sitting in the
10 main area by the big house. That's
11 where we chilled out. There's a table
12 there as well.

13 And, yeah, we were just
14 sitting on the sofas, and I think -- I
15 can't remember if I was giving Jeffrey
16 a massage, but we were all sitting
17 together, and I think he was getting
18 massaged by one girl and we were kind
19 of taking it in turns.

20 Q. Was it sexual?

21 A. No, it wasn't sexual. But
22 Ghislaine was there, and I wasn't
23 doing it properly and she showed me
24 how to massage him and how he liked
25 it.

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2 Q. What part of his body did
3 she show you how to massage?

4 A. His feet, his hands.

5 Q. Did she say anything to you?

6 A. I can't remember
7 specifically what she said to me. She
8 said a lot of things to me.

9 Q. Okay. Well, tell me what
10 you remember she said to you.

11 MR. GUIRGUIS: Objection.

12 When? Where? What? What are we
13 talking about?

14 A. I can't remember
15 specifically what she said to me. All
16 I know is that she wasn't -- she
17 wasn't a particularly nice person, to
18 me or anybody. So very dictorial
19 [sic].

20 Q. Unlimited by time or
21 anything, do you recall anything
22 Ghislaine said to you?

23 MR. GUIRGUIS: Objection.

24 You're asking her --

25 A. It was how to massage

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2 Jeffrey.

3 I remember speaking to her
4 quite a lot about my FIT application.

5 I remember speaking to
6 Ghislaine about my psychiatrist, about
7 my weight. My weight was a big issue.
8 And, in fact, everything was an issue
9 with Ghislaine.

10 Q. During this first time you
11 met her, other than discussing
12 massages, did those other topics come
13 up?

14 A. I can't remember the first
15 encounter with Ghislaine, but it was
16 pretty soon after. Everything
17 snowballed quite quickly.

18 Q. Well, you saw her getting
19 off the helicopter, correct?

20 A. Yeah.

21 Q. And you saw her on the
22 island for a couple days that time,
23 you said, correct?

24 A. Yeah.

25 Q. So during that time you saw

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2 her over a couple days, do you
3 remember any other discussions you had
4 with her apart from this massage?

5 A. We spoke about why I was
6 there, New York. I mean, we -- you
7 know, she got to know me. She asked
8 me a lot of questions about my family
9 life, my -- I mean, she questioned me
10 a lot on my personal life.

11 Q. Was anyone else present when
12 you were having these discussions with
13 Ghislaine?

14 A. Yes, everyone. Everyone
15 that was -- [REDACTED] [REDACTED], Jeffrey,
16 [REDACTED]

17 Q. Was there anyone different
18 on this trip?

19 A. [REDACTED] as well. [REDACTED] was
20 there.

21 Q. Anyone else on this trip?

22 A. I can't remember.

23 Q. Was [REDACTED] [REDACTED] [REDACTED] there?

24 A. Not the first time I met
25 Ghislaine.

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2 Q. Was anyone else there?

3 A. I can't remember.

4 Q. Anything that would refresh
5 your memory?

6 A. If you could give me the
7 plane logs or something, or names or
8 photos. Ten years, as I said, is an
9 incredibly long time. I don't
10 remember who -- I mean, it was such a
11 long time for me.

12 I came to New York, my
13 intention was to meet many people,
14 make new friends, make a new life for
15 myself. So I didn't really -- I don't
16 remember names specifically.

17 Q. Do you remember any
18 descriptions of other people who were
19 on the island the first time you met
20 Ghislaine?

21 A. They were all beautiful
22 people. I just remember being
23 surrounded by beautiful young people.
24 They were always girls. There were
25 always girls. You know, girls didn't

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2 even have time to kind of remember
3 girls' names because there was always
4 people leaving the island, popping in,
5 flying in. So there was a constant
6 flux of people coming in, popping in
7 visiting Jeffrey and Ghislaine.

8 Q. So the first time you met
9 Ghislaine, you saw her get off a
10 helicopter. She was on the island for
11 a couple days.

12 Any other females you
13 remember being there on that occasion?

14 MS. MCCAWLEY: Objection,
15 asked and answered.

16 A. [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] and I can't remember any
18 others.

19 Q. Can you remember any
20 descriptions of other people who were
21 there on that occasion?

22 MR. GUIRGUIS: Objection,
23 asked and answered.

24 A. They were just pretty. They
25 were just beautiful.

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2 Q. Hair color?

3 MR. GUIRGUIS: Objection.

4 A. Normal.

5 Q. Height?

6 A. I don't recall height.

7 Q. Any other physical
8 characteristics at all?

9 MR. GUIRGUIS: Objection.

10 A. Just that they were
11 extremely beautiful. I've never seen
12 girls like this.

13 Q. Well, you had been a model
14 in London, right?

15 A. Yeah, I have, but, you know,
16 Jeffrey Epstein, he acquired the
17 elite, didn't he, you know, him and
18 Ghislaine. So they were pretty much
19 the crème de la crème of the crop, I
20 would say, the girls that were around
21 him.

22 Q. On this first occasion when
23 you met Ghislaine and there were
24 beautiful girls, who you don't recall
25 what they look like; you recall they

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2 were beautiful?

3 A. Yeah, there were beautiful
4 people constantly surrounded by
5 Jeffrey Epstein and Ghislaine. They
6 were only surrounded by beautiful
7 people, beautiful girls.

8 Q. But apart from that, you
9 don't have any other specifics?

10 A. I don't recall the
11 appearance of the other girls. I
12 don't -- as I will say again, there
13 was a constant stream of people coming
14 in, going off the island, popping in,
15 popping out, girls flying in, girls
16 flying out. There were girls on the
17 island that were there shorter time
18 frames than me and flew out.

19 I didn't really -- I hung
20 out with my crew: [REDACTED] [REDACTED] They
21 were -- they were my friends. I
22 thought they were my friends. So I
23 didn't really cozy up to any of the
24 other girls.

25 It's like high school, you

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2 know, you're not friends with
3 everybody. You ask me who -- everyone
4 I went to school with, I don't
5 remember. I don't have a clue. I
6 don't know who they are.

7 Q. Do you have a best friend
8 from school?

9 MR. GUIRGUIS: Objection.

10 A. Several. Several. I mean,
11 who has any best friend at school?
12 School's school. We don't make best
13 friends at school.

14 Q. Who is [REDACTED]

15 A. She was an acquaintance that
16 I met in New York.

17 Q. Where did you meet her?

18 A. I think I met her at a bar
19 or something.

20 Q. Was she a friend of yours
21 during this time period?

22 A. She was an acquaintance. I
23 would say friend is -- yeah, I
24 wouldn't say friend. I'd say
25 acquaintance.

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2 Q. So on this occasion where
3 you met Ghislaine on the island and
4 you spoke to her about massage, did
5 you ever have any other sexual-type
6 interactions with her?

7 MS. MCCAWLEY: I didn't hear
8 the end of that. Did you say
9 "him"?

10 Q. Sexual-type interactions
11 with her?

12 A. With her?

13 Q. Ghislaine?

14 A. No.

15 Q. And do you recall if she
16 flew with you back on the plane?

17 A. I can't remember.

18 Q. What's the next time you
19 went to the island?

20 A. Again, I don't remember
21 specifically. I went various several
22 times during the duration. So I
23 remember there was a -- it was several
24 times. I can't remember the next time
25 I went to the island. I mean, it's...

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2 Q. Was it before you went back
3 to South Africa to visit?

4 A. Yes.

5 Q. All the visits to the island
6 were before that?

7 MS. MCCAWLEY: Objection.

8 A. Yeah.

9 Q. What's the next time you
10 remember meeting Ghislaine?

11 A. I met her at the office in
12 New York.

13 Q. What's the office?

14 A. Jeffrey's office, main
15 office.

16 Q. Where is that?

17 A. I don't remember the
18 location. It's central. It's got a
19 courtyard. Like when you walk in,
20 there's like a courtyard.

21 Q. What were you doing at
22 Jeffrey's office in New York?

23 A. We were preparing for my
24 college application. Jeffrey often
25 wanted to see just how I was doing, so

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2 I had to regularly pop in to see him
3 and Ghislaine. And Ghislaine would
4 often check how I was doing and blah,
5 blah, blah, etcetera.

6 Q. What were you doing to
7 prepare for your college application?

8 A. I had to write an essay.

9 Q. When did you --

10 A. Also, I had to do -- like,
11 you know how you apply for college
12 applications; you've got your
13 application forms and such. So it was
14 more admin.

15 Q. And you were going to
16 Jeffrey's office to work on your
17 forms?

18 A. Yes. And to just say hi. I
19 was -- well, I never went on my own
20 accord. I was either invited or told
21 to be there by either Ghislaine or
22 Jeffrey. I also went to the offices
23 on a number of occasions for private
24 legal matter.

25 Q. What's the private legal

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2 matter?

3 MR. GUIRGUIS: Objection.

4 I'm going to direct you not to
5 answer if it's unrelated to this
6 case.

7 Q. Was there an attorney
8 present?

9 A. Yes.

10 Q. What was the name of the
11 attorney who was present?

12 A. Alan Dershowitz.

13 Q. So I was asking about the
14 second time you met Ghislaine. It was
15 at Jeffrey's office in New York?

16 A. Yes.

17 Q. How did you come to be in
18 Jeffrey's office in New York where you
19 met Ghislaine the second time?

20 A. I was told to be there.

21 Q. Who told you to be there?

22 A. I think it was Ghislaine.

23 Q. How did Ghislaine tell you
24 to be there?

25 A. I can't remember if it was

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2 via telephone call. I can't remember
3 the exact communication that she used.
4 But I was told to regularly be there
5 when they wanted me there, and just
6 grabbed a taxi and arrived at the
7 office.

8 Q. Well, I'm asking you about
9 the second time.

10 So you met her on the
11 island, and the next thing you know,
12 you have a communication from her in
13 New York?

14 A. Well, she was always with
15 Jeffrey in his office, so it's like --
16 okay, so let me explain it.

17 So you go to an office and
18 you see Jeffrey's office there and
19 Ghislaine -- Ghislaine was always at
20 Jeffrey's office, so I think she had
21 her own office there.

22 So when you walk in and
23 you've met people before, you kind of
24 say hi to everyone. You know, you
25 have a little chitchat.

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2 Do you understand? You
3 don't -- you don't -- you know, I
4 chatted with Ghislaine, I chatted with
5 Jeffrey. It was a busy office. I
6 can't remember specifically what was
7 said. It was just a check-in, kind
8 of.

9 Q. So you were going there to
10 work on your college application, and
11 you happened to see Ghislaine in the
12 offices?

13 MS. MCCAWLEY: Objection.

14 A. She -- you know, she
15 participated in the -- you know, a
16 lot. She was interested in me. I
17 was -- you know, she interacted with
18 me.

19 Q. I know. I'm trying to
20 understand when you did this. When
21 was it?

22 A. It was the second time, the
23 first time I went to the office.

24 Q. The first time you went to
25 the office, the second time you met

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2 Ghislaine?

3 A. Yes.

4 Q. And when was it relative to
5 the first time you met Ghislaine?

6 A. I can't remember if it was a
7 couple of weeks later. I don't
8 remember the exact time frame of how
9 many days or weeks there was between
10 the first trip and the -- when I went
11 in to the office.

12 Q. But you do recall going into
13 the office to work on your college
14 application?

15 MS. MCCAWLEY: Objection.

16 A. Yes. Well, I went in a
17 number of times to the office. So,
18 like, we regularly had to report to
19 Jeffrey in the office. It was a -- we
20 were called all the time there.

21 Q. What do you mean, you had to
22 report there?

23 A. Well, Jeffrey liked to check
24 in with all of us.

25 Q. How was it communicated to

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2 you that you needed to report to the
3 office?

4 A. Jeffrey. I was just told to
5 be there; I had to be there.

6 Q. Who told that you?

7 A. Jeffrey and Ghislaine.

8 Q. Anyone else?

9 A. [REDACTED] [REDACTED] and [REDACTED]
10 [REDACTED]

11 Q. How did they communicate it
12 to you?

13 A. By telephonic call.

14 Q. To your cell phone?

15 A. And BlackBerry, which they
16 provided me.

17 Q. So you did not have a
18 BlackBerry before you met Jeffrey?

19 A. No.

20 Q. Then you got a BlackBerry
21 when you were --

22 A. That's correct.

23 Q. -- acquainted with him.

24 And what happened with the
25 phone you had before?

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2 A. It's got lost through
3 translation. I have moved several
4 times through the years, so...

5 Q. So you got messages or phone
6 calls?

7 A. BBMs, phone calls, text
8 messages.

9 All the emails that they
10 sent me, I think you guys have. There
11 wasn't a lot of email correspondence.
12 The majority of it was done by phone
13 call.

14 Q. Did you have any emails with
15 Ghislaine?

16 A. No, no email correspondence
17 with Ghislaine.

18 Q. Did you have her phone
19 number?

20 A. I did at the time, yeah.

21 Q. Do you remember what it was?

22 A. No.

23 Q. Do you remember what your
24 number was?

25 A. No.

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2 MR. GUIRGUIS: Objection,
3 asked and answered.

4 Q. Tell me about any
5 conversations you had with Ghislaine
6 that involved FIT.

7 MR. GUIRGUIS: Objection,
8 form.

9 A. I can't remember the
10 specific conversation. There were
11 many conversations. I was just
12 applying -- doing an application form.
13 And they were trying to get me in.
14 They -- yeah, I can't remember the
15 exact -- I think Ghislaine also knew
16 people there, so they were basically
17 trying to get me into FIT.

18 Q. Well, tell me what you
19 recall Ghislaine saying versus they?

20 A. I can't remember
21 specifically the conversation, so I
22 would not like to speculate. But I
23 will give you the overall conversation
24 was regarding my FIT application, but
25 I cannot remember the specific content

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2 or the specific words used.

3 But it was surrounding my
4 FIT application and an essay I had to
5 write, and they both proofread my FIT
6 application as well.

7 Q. And did they both read your
8 essay?

9 A. Yes, they did.

10 Q. When did you write that
11 essay?

12 A. I can't remember.

13 Q. Before you went to South
14 Africa?

15 A. Yes.

16 Q. Do you know what the
17 application deadline was?

18 A. I don't know. I don't know.
19 I can't remember.

20 Q. When did you meet Alan
21 Dershowitz?

22 A. I don't remember the
23 specific date. It was a few months
24 after I had been here in New York.

25 Q. Was it after you had gone to

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2 the island?

3 A. Yes.

4 Q. Do you know what time of
5 year?

6 A. I mean, I think it was
7 before winter.

8 Q. Well, you were here in the
9 fall.

10 A. Yeah.

11 Q. And you left in the winter?

12 A. Yeah. I left in May.

13 Q. So did you meet him before
14 you went to South Africa?

15 A. Yes.

16 Q. Well, let's be clear. You
17 were here until you went to South
18 Africa, and you left for a while and
19 then you came back, right?

20 A. Mm-hmm.

21 Q. How long were you gone?

22 A. I think about three -- about
23 three weeks.

24 Q. So you met him before you
25 went to South Africa?

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2 A. Yes.

3 Q. And tell me about when you
4 met Alan.

5 A. I first met Alan at the
6 offices.

7 Q. And tell me what happened.

8 A. I can't really tell you what
9 happened, because it's about a legal
10 matter.

11 Q. Was he your lawyer?

12 A. He was going to be assigned
13 to be my lawyer.

14 Q. Assigned to be your lawyer?

15 A. Through Jeffrey's
16 instruction.

17 Q. Okay. Was he your lawyer?

18 MS. MCCAWLEY: Objection,
19 asked and answered.

20 MS. MENNINGER: I don't know
21 if there's a privilege.

22 MR. GUIRGUIS: There's a
23 privilege whether he was retained
24 or not, right? I mean, if you're
25 at a cocktail party and you speak

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2 to a lawyer, you know that
3 conversation is privileged.
4 So...

5 MS. MENNINGER: Well, I
6 don't, actually.

7 MR. GUIRGUIS: You're free
8 to research it.

9 MS. MENNINGER: I will ask
10 questions, then, to try to
11 establish whether or not there's
12 a good-faith basis.

13 Q. Did you approach Alan
14 Dershowitz for the purpose of seeking
15 legal advice?

16 A. I was introduced to Alan.

17 Q. By whom?

18 A. Jeffrey Epstein.

19 Q. On what day?

20 A. I don't recall what day.

21 Q. Was it related to some event
22 that had occurred just before that?

23 A. Yes, that's correct.

24 Q. Were you in touch with any
25 law enforcement authorities?

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2 A. No.

3 Q. Hmm?

4 A. No.

5 Q. Was Jeffrey Epstein in the
6 room when you were speaking with Alan
7 Dershowitz?

8 A. Yes.

9 Q. Did Jeffrey Epstein overhear
10 your conversation with Alan
11 Dershowitz?

12 A. Yes.

13 Q. What did you talk about with
14 Alan Dershowitz?

15 MR. GUIRGUIS: Objection.

16 A. It --

17 MR. GUIRGUIS: Objection. I
18 direct the witness not to answer.

19 MS. MENNINGER: A third
20 party was in the room; you've
21 heard that, Counsel. And you
22 know that means that's a waiver.

23 MS. MCCAWLEY: No. I mean,
24 they would have been involved --
25 we don't know what the situation

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2 is. They could have been
3 involved together. There could
4 be a number of reasons why
5 Jeffrey had some sort of common
6 interest with her with that.

7 Q. Did you sign a common
8 interest agreement with Jeffrey?

9 MR. GUIRGUIS: Objection.
10 Do not answer.

11 MS. MENNINGER: Whether she
12 had a common interest agreement
13 with Jeffrey, you're instructing
14 her not to answer; is that right,
15 Counsel?

16 MR. GUIRGUIS: Do you have
17 realtime in front of you,
18 Counsel?

19 MS. MENNINGER: I don't.

20 MR. GUIRGUIS: You don't?
21 You can borrow mine.

22 MS. MENNINGER: I don't want
23 it. Thank you.

24 MR. GUIRGUIS: Okay.

25 Q. Anyone else in the room when

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2 you spoke with Mr. Dershowitz?

3 A. No.

4 Q. Describe Mr. Dershowitz for
5 me.

6 A. He -- old age; [REDACTED], pasty
7 skin; not very attractive. Wears
8 glasses. Bit of an ugly man, really.

9 Q. Did he have any facial hair?

10 A. I can't recall at that time,
11 no.

12 Q. Mustache?

13 A. I can't remember.

14 Q. Beard?

15 A. I can't remember.

16 Q. You can't remember if he had
17 a mustache or a beard?

18 MR. GUIRGUIS: Objection,
19 asked and answered.

20 MS. MCCAWLEY: Objection.

21 A. I don't recall seeing a
22 massage -- sorry, a mustache on Alan
23 Dershowitz. I don't recall a massive
24 amount of facial hair. I recall Alan
25 Dershowitz. Whether he had stubble or

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2 not, I'm -- yeah, it's -- he didn't
3 have a beard, I don't think.

4 Q. All right. Did you sign an
5 affidavit that you submitted in this
6 case?

7 A. Yes.

8 Q. Did you make the allegation
9 in your declaration that you had a
10 sexual relationship with Alan
11 Dershowitz?

12 A. Yes, I absolutely did.

13 Q. When did you have sex with
14 Alan Dershowitz?

15 A. I can't remember the exact
16 time, but it was in Jeffrey's New York
17 apartment.

18 Q. Where in the apartment?

19 A. It was in a bathroom. I
20 can't remember.

21 Q. Was it before or after you
22 had this conversation that you won't
23 describe?

24 A. It was after.

25 Q. So do you recall what month

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2 that was? Before you went to South
3 Africa or after you went to South
4 Africa?

5 A. I can't remember.

6 Q. How long did you speak to
7 Alan Dershowitz during your first
8 meeting with him?

9 A. Until I was finished
10 explaining what my legal matter was.

11 Q. Did he believe you to be --
12 did he believe that he was your lawyer
13 during that conversation?

14 MR. GUIRGUIS: Objection.

15 MS. MCCAWLEY: Objection.

16 MR. POTTINGER: Please.

17 MR. PAGLIUCA: All right,
18 guys. You know, let's just do
19 the deposition here without the
20 chorus over there.

21 MR. GUIRGUIS: And without
22 the speeches as well.

23 We agree, let's carry on
24 without asking ridiculous
25 questions about what other

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2 people's mental state was. I
3 think that's a good idea. Let's
4 carry on.

5 Counsel?

6 Q. Did you ever sign a fee
7 agreement with Alan Dershowitz?

8 A. No.

9 Q. Did you ever appear in court
10 with Alan Dershowitz?

11 A. No.

12 Q. Did you ever appear in court
13 yourself?

14 A. No.

15 Q. Did you ever have any
16 contact with any law enforcement
17 officers while you were in New York?

18 A. No.

19 Q. Any police?

20 A. No.

21 Q. After you left that meeting
22 with Alan Dershowitz, when did you see
23 him next?

24 A. I can't remember. I think
25 it was at dinner. There was a dinner,

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2 yeah.

3 Q. And do you know whether the
4 dinner was before or after you went to
5 South Africa?

6 A. I can't remember the
7 specific time period, so I don't
8 remember if it was before or after.
9 But it was --

10 Q. Where was the dinner?

11 A. It was in a restaurant in
12 New York.

13 Q. What restaurant?

14 A. I can't remember.

15 Q. Who else was there?

16 A. I remember Alan, Jeffrey,
17 myself. And I can't remember if
18 others -- if there were other people
19 there.

20 Q. What type of restaurant was
21 it?

22 A. It was a nice restaurant.

23 Q. Do you remember the type of
24 cuisine?

25 A. No.

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2 Q. When was the next time --
3 what do you remember discussing that
4 dinner?

5 A. The legal matter I had.

6 Q. Did you consider him to be
7 your lawyer at that dinner?

8 A. Yes, I did.

9 Q. What's the next time that
10 you saw Alan Dershowitz?

11 A. At Jeffrey's New York
12 mansion.

13 Q. When was that?

14 A. It was after the second time
15 I had met Alan.

16 Q. Had you been to South
17 Africa?

18 A. I can't remember.

19 Q. Tell me what happened during
20 that encounter.

21 A. I walked in the room -- I
22 walked in the house. Jeffrey and
23 ██████ and Alan were there.

24 Q. What happened after you
25 walked in the house?

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2 A. I -- it was really strange,
3 because [REDACTED] didn't like me. And so
4 when I arrived, we had -- I think -- I
5 can't remember if I had, like, water
6 or whatever.

7 [REDACTED] took me upstairs. I
8 remember there was a room. I didn't
9 quite understand what was going on at
10 the time. I knew obviously something
11 was going on, because I never met
12 [REDACTED] socially.

13 So [REDACTED] started undressing
14 me in the room. She started
15 undressing me by the bed. We got on
16 the bed. I kind of knew what was
17 going on from that. The girls were
18 often forced to have sex with each
19 other for Jeffrey's pleasure, so it
20 was just another occasion, I guess.

21 Jeffrey then walked in the
22 room. He started masturbating under
23 his clothes. He put his hand in his
24 trousers. A few minutes later Alan
25 walked in the room. He started

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2 undressing, he got on the bed with
3 [REDACTED] and myself, and we basically had
4 a three-way sexual interaction.

5 Q. Was Alan fully unclothed?

6 A. During -- when? At what
7 specific -- he walked in with clothes.

8 Q. And he got fully undressed?

9 A. Yes.

10 Q. So you saw his entire naked
11 body?

12 A. Yes.

13 Q. Did you notice anything
14 specific about his body?

15 A. Not that I recall. I mean
16 -- yeah, not that I -- I can't really
17 remember. It was quite a -- it was
18 a -- it wasn't a pleasant experience.

19 Q. What did you do with Alan?

20 A. I gave him oral sex,
21 masturbated him.

22 Q. Anything else?

23 A. He did the same with [REDACTED]
24 He performed the same on me.

25 Q. Did he ejaculate?

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2 A. He did, yeah.

3 Q. In your mouth?

4 A. No.

5 Q. Did you have intercourse
6 with him?

7 A. No, not penetration, no.

8 Q. Did you see him ejaculate
9 more than once?

10 A. No, I didn't see him
11 ejaculate more than once.

12 Q. You didn't notice any scars?

13 MS. MCCAWLEY: Objection.

14 A. I don't recall specific
15 markings on every man I've been with
16 body. So it's not something -- I
17 wasn't ravishing Alan's body. I was
18 trying to close my eyes and just get
19 it done so I could go home and watch
20 TV, really. So I wasn't really aware.

21 I didn't really like kind of
22 go, woo, his body. I don't -- I don't
23 recall his body at all. Like, I don't
24 make a mental note of every man's body
25 I've slept with.

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2 Q. Other than Jeffrey, is that
3 the first time you had sex with
4 another man in his home or on his
5 property?

6 A. Sorry, can you just repeat
7 the question.

8 MR. GUIRGUIS: Or rephrase
9 it.

10 THE WITNESS: I'll just read
11 it.

12 MR. GUIRGUIS: If you
13 understand it.

14 A. Yeah, he was the only
15 person, Alan Dershowitz.

16 Q. Did you have sex with him
17 more than once?

18 A. No.

19 Q. At the occasion you just
20 described, did he have an erection?

21 A. It was -- it was -- it
22 wasn't particularly hard. It was
23 pretty disappointing.

24 Q. And where did he ejaculate?

25 A. I had given him oral sex

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2 and, well, he ejaculated -- he
3 ejaculated. I mean, there's only so
4 many places a man can ejaculate. He
5 didn't ejaculate on me.

6 He didn't ejaculate in my
7 mouth. I gave him oral and I
8 masturbated him and finished him off.
9 He ejaculated over himself, me.
10 Just -- there wasn't a lot of
11 ejaculation. I don't remember a lot
12 of sperm. I didn't see massive
13 amounts of semen. But I just remember
14 him ejaculating, but it wasn't in my
15 mouth.

16 Q. And in terms of time frame,
17 the best you can say is this is after
18 you had been to the island a few
19 times?

20 A. That's correct.

21 Q. And you don't remember if it
22 was before or after you went to South
23 Africa?

24 A. I can't remember
25 specifically, no.

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2 Q. Did you see Alan Dershowitz
3 again after that one occasion?

4 A. No.

5 Q. So you saw him at the
6 office, you say saw him at dinner, and
7 you saw him that one time in the
8 bedroom at Jeffrey's house?

9 A. That's correct.

10 MS. MENNINGER: It's 1:00.

11 I think we should take a small
12 lunch break.

13 (Time noted: 1:01 p.m.)

14 (Luncheon recess.)

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2 A F T E R N O O N S E S S I O N

3 (Time noted: 1:54 p.m.)

4 MR. GUIRGUIS: Counsel,
5 before you commence with your
6 questioning, I think there's one
7 issue from this morning that the
8 witness wants to correct herself
9 on, so just let her do that now.

10 THE WITNESS: I said earlier
11 that I would just like to correct
12 that my lawyers are paying for --
13 they are covering my hotel
14 expense.

15 MS. MENNINGER: Thank you
16 for that clarification.

17 THE WITNESS: And --

18 MR. GUIRGUIS: Go ahead.

19 THE WITNESS: And my flight.

20 MS. MENNINGER: Thank you.

21 [REDACTED], RESUMED,
22 having been previously and duly
23 sworn, was examined and testified
24 further, as follows:

25 CONTINUED EXAMINATION

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2 BY MS. MENNINGER:

3 Q. Going back to your first
4 conversation with Alan Dershowitz, at
5 any point in that conversation, had
6 Mr. Dershowitz agreed to act as your
7 lawyer?

8 A. Yes.

9 Q. Did he do anything in terms
10 of contacting anyone on your behalf?

11 MR. GUIRGUIS: Objection.

12 Do not answer.

13 Q. What was the specific legal
14 matter that you were seeking
15 representation for?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 Do not answer.

19 Q. What did you understand the
20 purpose of Jeffrey Epstein being in
21 the room for during that conversation?

22 A. Jeffrey was there to support
23 me and Jeffrey was looking after me.

24 Q. When you engaged in sexual
25 conduct with Alan Dershowitz, did you

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1 HIGHLY CONFIDENTIAL AEO

2 see any evidence on his body of his
3 surgical procedure?

4 A. I don't recall seeing
5 anything. I can't remember.

6 Q. Did you see any bandages?

7 A. I can't remember.

8 Q. Did you see him bleed
9 through his penis?

10 A. Not that I recall.

11 Q. Do you recall seeing
12 Mr. Dershowitz bleed through his
13 penis?

14 MS. MCCAWLEY: Objection,
15 asked and answered.

16 A. Not that I recall.

17 Q. When you were on the island,
18 sometime less than ten times, you
19 think, did you ever use any drugs?

20 A. No.

21 Q. Did you use cocaine?

22 A. No.

23 Q. Did you ever get thrown off
24 the island for using cocaine?

25 A. No.

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2 Q. Did you drink alcohol?

3 A. No.

4 Q. None?

5 A. During on the island,
6 whenever I was around Jeffrey,
7 absolutely not.

8 Q. Other than going to the
9 island, did you travel with Jeffrey
10 anywhere else?

11 A. No.

12 Q. Did you ever travel anywhere
13 with Ghislaine Maxwell?

14 A. No.

15 Q. Did you ever fly on an
16 airplane with Ghislaine Maxwell?

17 A. I don't -- I don't remember.

18 Q. You don't remember any time
19 you flew on a plane with Ghislaine
20 Maxwell?

21 A. No, I don't remember. There
22 were always many people on the plane.

23 Q. When you refer to the plane,
24 you're referring to a private plane?

25 A. Jeffrey's plane, yes.

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2 Q. Did you travel on more than
3 one plane of Jeffrey's?

4 A. Not that I -- no, I don't
5 remember. I don't remember.

6 Q. Can you visualize in your
7 head any other layout of a different
8 type of plane than the one you drew in
9 Defendant's Exhibit 1?

10 A. No.

11 Q. Why did you go to South
12 Africa in early 2007?

13 A. To visit my family.

14 Q. And which family members did
15 you visit?

16 A. My father and my stepmother.

17 Q. Anyone else?

18 A. No.

19 Q. Any siblings?

20 A. My younger brother and
21 sister lived with my parents; my dad
22 and my stepmom and their two younger
23 children.

24 Q. Did you see any school
25 friends there?

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2 A. No.

3 Q. Who paid for your plane
4 ticket to go to South Africa?

5 A. Jeffrey did.

6 Q. How did that come about?

7 A. I wanted to see my family,
8 and he funded the plane ticket because
9 he was funding everything else at that
10 time.

11 Q. What else was he funding at
12 that time?

13 A. Accommodation, travel,
14 taxis, food, my prescription that I
15 had to pay for, for the prescription
16 that -- prescription drugs.

17 Q. Had you taken any
18 prescriptions for mental health
19 disorders before October 2006?

20 A. No.

21 Q. Have you taken any since May
22 of 2007?

23 A. Yes, I have.

24 Q. Which ones?

25 A. Paroxetine.

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2 Q. Anything else?

3 MS. MCCAWLEY: I'm going to
4 object. There's no time frame on
5 this. You're talking about one
6 year? All the years from 2007 to
7 2015? Which I would say is
8 inappropriate for a nonparty
9 witness to talk about her -- if
10 you're talking generally about
11 prescriptions.

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[illegible]

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2 I had been prescribed were incorrect.

3 Q. Those are the ones you
4 mentioned earlier in your testimony?

5 A. Yeah. I had to stop and
6 change medication, because I was first
7 started on lithium. The lithium made
8 me put on weight at quite a rapid
9 rate, so I was put on so many
10 different types of medication because
11 I didn't -- not every one agrees with
12 you. Weight was a massive issue for
13 Ghislaine and Jeffrey, so the lithium
14 just didn't work for me. I mean, I
15 put on weight quite quickly.

16 Q. What did Ghislaine Maxwell
17 say to you about weight?

18 A. Well, what did she not say?
19 She bullied me massively about my
20 weight.

21 Q. What did see say?

22 A. I was told that I would lose
23 Jeffrey's financing if I didn't lose
24 weight, and I would not -- they would
25 not help me get into FIT.

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2 Q. Who were you told that by?

3 A. Ghislaine and Jeffrey.

4 Q. In the same conversation?

5 A. Various conversations.

6 Q. Tell me your conversations
7 with Ghislaine. When did she say that
8 to you?

9 A. On the island.

10 Q. Before you went to South
11 Africa?

12 A. Yes.

13 Q. And was that in person?

14 A. Yes.

15 Q. Who else was present?

16 A. [REDACTED], a girl
17 named [REDACTED] and a girl named [REDACTED]
18 Sorry, I just remembered a name. A
19 girl named [REDACTED] and a girl named
20 [REDACTED]

21 Q. So they were all present
22 when you had a discussion with
23 Ghislaine about your weight on the
24 island?

25 A. Yes.

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2 Q. And what did Ghislaine say
3 to you about your weight when you were
4 on the island in front of all these
5 people?

6 A. I can't remember the
7 specific conversation, how it went.
8 We got into an argument about my
9 weight, quite a heated argument.

10 Q. What do you recall about the
11 argument?

12 A. I recall it got so heated
13 that I ran off and tried to swim off
14 the island. I wanted to get as far
15 away from Jeffrey and Ghislaine as
16 possible.

17 Q. Okay. And then what
18 happened?

19 A. I left the main house. I
20 took -- there's like a buggy thing.
21 It was evening. I drove to a
22 particular spot on the island. It was
23 -- so Jeffrey's island is quite rocky
24 around the edges, so -- and it's not
25 really -- you can't just go into the

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2 water. It was quite steep. And,
3 well, I didn't really know how to swim
4 away. I didn't know how to escape.
5 But I wanted to, at that precise
6 moment, get as far as away from him as
7 possible.

8 Q. So you had a heated argument
9 about your weight with Ghislaine?

10 A. Ghislaine and Jeffrey.

11 Q. They were both there?

12 A. Yes.

13 Q. And do you remember anything
14 that was said during that argument?

15 A. It was basically an
16 ultimatum that I either lose weight
17 or -- or that's it.

18 THE WITNESS: Sorry, can I
19 -- sorry. I need to get a
20 headache tablet, if you don't
21 mind.

22 MS. MENNINGER: Go off the
23 record for a second.

24 (An off-the-record
25 discussion was held.)

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2 MS. MENNINGER: Go back on.

3 Q. You were given an ultimatum
4 to lose weight or what?

5 A. They wouldn't help me to get
6 into FIT, and that my time with
7 Jeffrey would be -- would end.

8 Q. Who said what?

9 A. Well, they both -- they both
10 said it in so many words. I can't
11 remember the exact conversation. I
12 remember it being heated. I remember
13 them giving me the ultimatum. I think
14 a few curse words were shared. I
15 can't -- it was a very heated
16 conversation. I can't remember the
17 exact words.

18 Q. Was [REDACTED] there?

19 A. No, I don't recall her being
20 there.

21 Q. Were you taking the
22 medications that you talked about
23 earlier during this time period?

24 A. Yes.

25 Q. Had you put on weight since

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2 taking those medications?

3 A. Yes, I had. And I had also
4 put on weight because I wasn't allowed
5 to smoke any cigarettes at all, with
6 Jeffrey on the island or anywhere near
7 Jeffrey. Jeffrey wasn't allowed to
8 know that we smoked.

9 So I put on also a lot of
10 weight as well, in conjunction with
11 the lithium. So yeah.

12 Q. How did the topic of your
13 weight come up?

14 A. Well, I wasn't as skinny as
15 the other girls, and Jeffrey liked his
16 girls very thin.

17 Q. Were you interested in
18 modeling at that point in time?

19 A. I was doing freelance
20 modeling at the time, but I mean, I
21 wasn't exactly going to be a Kate
22 [REDACTED]. And the modeling agency thought
23 I wasn't petite enough for them
24 either.

25 I would like to clarify I

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2 wasn't actually fat; I was normal
3 weight, by the way, just to make that
4 clear. I am 64, 65 kilograms at that
5 time.

6 Q. Why did you understand that
7 Jeffrey and Ghislaine wanted you to
8 lose weight?

9 A. I was one of the girls that
10 Jeffrey had sexual encounters with
11 regularly. He liked his girls thin.

12 Q. Did you ask Jeffrey to help
13 you become a model?

14 A. No. I wanted to get a
15 degree and an education.

16 Q. So you were not attempting
17 to become a model at that point in
18 time?

19 A. No. I wanted to get an
20 education as opposed to being a model.

21 Q. Did you talk to [REDACTED] [REDACTED]
22 [REDACTED] about becoming a model?

23 A. I -- as I was freelancing
24 during that time, or trying to get
25 freelancing work, Jeffrey kept us on a

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2 little string with his massage
3 payments, so I wanted to earn a
4 separate income while I was doing my
5 education to fund my living expenses.
6 So, you know, I wanted to potentially
7 increase my jobs.

8 But no, my job was not to be
9 a high-fashion model. I wanted to get
10 my degree, get my education and work
11 in the fashion industry.

12 Q. You had worked as a model
13 during college earlier, correct?

14 A. Yes.

15 Q. And you saved up money from
16 that job, correct?

17 A. Yes.

18 Q. And you had used that money
19 to fly to New York at some point,
20 correct?

21 A. Yes.

22 Q. And what you're saying now
23 is you would also potentially do
24 modeling while you were studying in
25 the future?

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2 MR. GUIRGUIS: Objection.

3 That's not at all what she's
4 saying.

5 A. As in future, as in would I
6 do modeling now?

7 Q. No. I'll rephrase the
8 question.

9 A. Please.

10 MS. MENNINGER: Let's take a
11 break, go off the record. And
12 when you finish the salad, we'll
13 proceed.

14 (Time noted: 2:14 p.m.)

15 (Recess.)

16 (Time noted: 2:15 p.m.)

17 MS. MENNINGER: Go back on
18 the record.

19 Q. At the time you were having
20 a discussion with Jeffrey and
21 Ghislaine about your weight when you
22 were on the island, did you have any
23 intention of being a model at that
24 time?

25 A. I was a freelance model. I

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2 wanted to increase my workload to help
3 fund my living expenses. So it was
4 not my intention to be a full-time
5 model, because I quite clearly applied
6 to a college to get an education that
7 I was promised by Jeffrey Epstein.

8 Q. Between January of 2007 and
9 today, have you worked as a model?

10 A. No.

11 Q. When you left for South
12 Africa, did you have a ticket to
13 return to the U.S.?

14 A. At that time, a return
15 ticket hadn't been booked by Jeffrey
16 yet.

17 Q. You traveled to South Africa
18 to visit your family without a return
19 ticket?

20 A. Yes.

21 Q. Did anyone travel with you
22 to South Africa?

23 A. No.

24 Q. Your mother was not in South
25 Africa when you went to South Africa

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2 on that occasion in 2007, correct?

3 A. Correct.

4 Q. What did you do while you
5 were in South Africa in February of
6 2007?

7 A. Spend time with my family.

8 Q. Anything else?

9 A. I spent time with my family,
10 that's -- that's it.

11 Q. Did you visit any modeling
12 agencies?

13 A. Yes, I did visit some
14 modeling agencies.

15 Q. Which modeling agencies did
16 you visit?

17 A. I can't remember the exact
18 names. The modeling agencies were on
19 Long Street in Cape Town. I visited
20 several modeling agencies on Long
21 Street, and Bree Street as well. Bree
22 Street and Long Street and a few
23 others in central Cape Town. So I
24 visited a few, actually.

25 Q. Had you worked with any of

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2 those modeling agencies in the past?

3 A. No.

4 Q. Did you have any connections
5 with any of those modeling agencies?

6 A. No.

7 Q. Did you have an agent at
8 that time?

9 A. No.

10 Q. What did you do when you
11 visited the modeling agencies in Cape
12 Town in February of 2007?

13 A. I was requested to look for
14 a PA for Mr. Epstein.

15 Q. What does that mean?

16 A. It means that he told me he
17 would pay me a certain amount of money
18 to find him a PA in South Africa.

19 Q. What do you understand the
20 initials PA to stand for?

21 A. Personal assistant.

22 Q. What are the job
23 responsibilities of a personal
24 assistant?

25 A. To book flights, type, do

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2 faxes. Basically a PA is your -- a
3 CEO's right-hand man of, you know,
4 company's -- anything business-wise.
5 They do everything, really, for that
6 person.

7 Q. When did Jeffrey ask you to
8 find him a PA while in South Africa?

9 A. Before I went.

10 Q. Did you agree to do that?

11 A. Yes.

12 Q. And you did go to the
13 modeling agencies?

14 A. I told Jeffrey I did, but I
15 actually -- I went to a couple and
16 then I just -- it wasn't right. My
17 gut instinct was -- yeah.

18 Q. What happened when you went
19 inside the modeling agencies in Cape
20 Town?

21 A. I was humiliated. I was
22 completely embarrassed. I couldn't
23 even ask them what Jeffrey was
24 wanting. I mean, it was so absolutely
25 ridiculous, his request of me finding

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1 HIGHLY CONFIDENTIAL AEO

2 him a PA.

3 Q. So what happened?

4 A. So I -- I asked if they had
5 any girls that would want to travel;
6 they would be put up in accommodation
7 and they would be a PA.

8 And when I actually spoke to
9 the modeling agencies, they actually
10 laughed at me, because it was quite
11 ridiculous that a young 22-year-old
12 was asking a modeling agencies for a
13 18-year-old PA for a multi-billionaire
14 who had several already.

15 Q. So you recall a conversation
16 where the person you were speaking to
17 started laughing?

18 A. Yes.

19 Q. What type of person were you
20 describing that you were looking for?

21 A. The same specifications that
22 Jeffrey told me: She had to be 18,
23 thin, very young looking, pretty.

24 Q. Anything else?

25 A. Well, bright and able to

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1 HIGHLY CONFIDENTIAL AEO

2 type.

3 Q. Did you go on a diet while
4 you were in South Africa?

5 A. I was forced to go on a
6 diet.

7 Q. Tell me what you mean by
8 forced to go on a diet.

9 A. After that incident on the
10 island in -- it was December, when
11 Ghislaine brought me back to the main
12 house after she -- she sent a search
13 party. She led a search party to find
14 me on the island and bring me back.

15 Q. Ghislaine led a search
16 party?

17 A. Yeah, yeah, yeah. She got
18 everyone together and they all went
19 looking for me when I disappeared.

20 Q. Who went looking for you?

21 A. [REDACTED], Jeffrey, the
22 girls, Ghislaine.

23 Q. Which girls?

24 A. [REDACTED] and [REDACTED] the girl
25 named [REDACTED]

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2 Q. Did Jeffrey go searching for
3 you?

4 A. Yes.

5 Q. How do you know that?

6 A. I was told.

7 Q. About whom?

8 A. By [REDACTED] and the other
9 girl.

10 Q. Where were you located?

11 A. On the island.

12 Q. Where on the island?

13 A. A corner of the island.

14 Q. On the water?

15 A. No. It was quite a long
16 drop off the -- it was like a
17 cliff-type -- I wasn't able to jump or
18 get in the water.

19 Q. Your intent was to swim off
20 the island, but you didn't make it
21 into the water?

22 A. No, because I would have
23 killed myself, so it wasn't safe.

24 Q. So who located you on this
25 corner of the island?

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2 A. I can't remember who got to
3 me first. I remember the -- I can't
4 remember who found me first.

5 Q. Do you remember anyone who
6 found you?

7 A. Yes, I was definitely found
8 because I didn't have enough time to
9 find a different location on the
10 island so I could get off and swim
11 away from Jeffrey and Ghislaine.

12 Q. Once they found you, what
13 happened?

14 A. I was brought back to the
15 main house.

16 Q. How were you brought back?

17 A. The same way that I got
18 there, on the, like, beach buggy,
19 black 4-by-4, not -- what are they.
20 Quad things.

21 MS. MCCAWLEY: Quad bikes?

22 A. Quad bikes, yeah.

23 Q. Did you bike back?

24 A. Yes.

25 Q. Accompanied by some people?

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2 A. I was accompanied back, yes.

3 Q. By whom?

4 A. I can't remember
5 specifically who it was.

6 Q. Okay. And once you got
7 back, what happened?

8 A. They tried to calm me down.

9 Q. And then what happened?

10 A. From that evening onwards, I
11 was -- Jeffrey put me on the Atkins
12 Diet.

13 Q. Did you calm down?

14 A. Yes, I did.

15 Q. Did you take some more
16 medications?

17 A. No. When you're on
18 prescription drugs, you only take them
19 at a specific required time.
20 Generally you don't take more than
21 your prescription when you're on
22 prescription drugs, so you don't kind
23 of just throw tablets in your mouth.
24 You kind of just take them in the
25 morning or --

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2 Q. I asked a bad question.

3 A. Yeah.

4 Q. You said earlier that the
5 prescriptions were causing you to gain
6 weight, I thought you said.

7 A. Yes.

8 Q. And then you just said you
9 were put on a diet after this event,
10 correct?

11 A. Yes.

12 Q. And what do you mean by you
13 were put on a diet?

14 A. Jeffrey said, you either go
15 on the Atkins Diet, or I can go.

16 Q. Go meaning off the island?

17 A. As in, don't call me back,
18 Sarah.

19 Q. Here's the question: Did
20 you discontinue the medications at the
21 same time you went on the Atkins Diet?

22 A. No.

23 Q. And how long were you on the
24 Atkins Diet?

25 A. Long enough for my kidneys

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2 to be incredibly painful and for me to
3 no longer continue on the diet because
4 it was unsafe to do so.

5 Q. Did you seek medical help
6 for that pain?

7 A. I just took painkillers.

8 Q. What painkillers did you
9 take?

10 A. I can't remember what
11 painkillers.

12 Q. Prescription or
13 over-the-counter?

14 A. Over-the-counter.

15 Q. Were you on the diet for
16 more than a week?

17 A. Yes, I was.

18 Q. More than a month?

19 A. Yes.

20 Q. More than two months?

21 A. I can't remember.

22 Q. Were you on the diet the
23 whole time you were in South Africa?

24 A. Yes.

25 Q. Did you continue on the diet

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2 after you returned?

3 A. Yes.

4 Q. What was the lowest weight
5 that you reached during that period of
6 time on the diet?

7 A. 56 kilograms.

8 Q. Had you ever weighed
9 56 kilograms in your adult life --

10 A. No.

11 Q. -- previously?

12 A. No.

13 Q. Have you since?

14 A. No.

15 Q. Did you speak to Jeffrey
16 again about that diet?

17 A. Multiple times.

18 Q. What did you say?

19 A. I complained frequently
20 about the diet that he had put me on,
21 because it was seriously affecting my
22 physical health as well as my mental
23 health. Yeah, it's a pretty hectic
24 diet.

25 Q. The time you were on this

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2 diet, did you have a boyfriend?
3 A. [REDACTED], yeah. Yes.
4 Q. Who was your boyfriend at
5 the time?
6 A. [REDACTED]
7 Q. [REDACTED]
8 A. That's [REDACTED] [REDACTED] This is
9 [REDACTED]
10 Q. What's [REDACTED] last name?
11 A. I think it's [REDACTED]
12 Q. Where did he live?
13 A. In the Upper East Side.
14 Q. Did you talk to [REDACTED] about
15 your diet?
16 A. Yes.
17 Q. Were you living with [REDACTED]
18 A. Not at -- not when I was in
19 South Africa.
20 Q. When you returned from South
21 Africa, did you move in with [REDACTED]
22 A. Yes, I did, to get away from
23 Jeffrey.
24 Q. And where on the Upper East
25 Side did [REDACTED] live?

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2 A. I can't remember.

3 Q. Walkup or elevator building?

4 A. Elevator.

5 Q. How big was that apartment?

6 A. It's relatively small.

7 Q. More than one bedroom?

8 A. No, it was just one bedroom.

9 It was a small, tiny apartment.

10 Q. And what did [REDACTED] do for a
11 living?

12 A. He was a [REDACTED]

13 Q. Where did he work?

14 A. He worked at -- I can't
15 remember where he worked.

16 Q. How did you meet [REDACTED]

17 A. At a delicatessen, when I
18 was buying food.

19 Q. Had you started dating him
20 before you went to South Africa?

21 A. I think we had gone on a
22 couple dates or something.

23 Q. Where had you gone on your
24 dates?

25 A. I can't remember.

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2 Q. When you were in South
3 Africa, did you have contact with

4 [REDACTED]

5 A. Once or twice, like three
6 times. Well, we were sort of seeing
7 each other, so I don't know how many
8 phone times I spoke to him in a month.
9 Yeah, a few times I spoke to [REDACTED]

10 Q. When you spoke to him, did
11 he ask you to move in with him when
12 you returned?

13 A. I wouldn't really say that.
14 I wouldn't really say he asked me to
15 move in.

16 Q. Okay. What would you say?

17 A. I asked him for me to move
18 in with him.

19 Q. Okay. While you were in
20 South Africa, did you receive any
21 phone calls from Jeffrey?

22 A. Yes.

23 Q. Did you want Jeffrey to call
24 you there?

25 A. Yes. He was helping me get

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2 into FIT.

3 Q. Any other reason for you to
4 have communications while you were in
5 South Africa?

6 A. I was living in his
7 apartment.

8 Q. In South Africa?

9 A. In New York.

10 Q. So you wanted to have
11 communications with Jeffrey while you
12 were in South Africa because you were
13 living in his apartment in New York?

14 MS. MCCAWLEY: Objection.

15 A. And he was going to -- he
16 promised that he would pay for my
17 education. And I was staying in his
18 apartment and he was funding my life,
19 so of course I would want him to
20 contact me.

21 And, also, he was still --
22 he told me he would pay for my return
23 ticket. So, yeah, of course I wanted
24 him to contact me.

25 (An off-the-record

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2 discussion was held.)

3 Q. Did you have an intention
4 while you were in South Africa to go
5 to Miami upon your return?

6 A. I think there was a vague
7 conversation about it, but I had no
8 real intention of going to Miami. I
9 had a conversation with [REDACTED] about
10 it.

11 Q. What, if anything, were you
12 going to do in Miami?

13 A. I can't remember.

14 Q. Did you have a job lined up
15 in Miami?

16 A. I can't remember.

17 Q. An internship?

18 A. It was something to do with
19 Jeffrey, that Jeffrey, [REDACTED] and --
20 it would have -- it would have -- it
21 was through Jeffrey, something with
22 Miami. I can't remember what it was
23 for or -- I don't remember. It
24 didn't -- it was just a conversation
25 about Miami.

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2 Q. So not a real firm plan to
3 go to Miami?

4 A. No, no.

5 Q. Were you disappointed when
6 you didn't go to Miami?

7 A. No, no, not at all.

8 Q. And you weren't planning to
9 be a model in Miami, for example?

10 A. No.

11 Q. You said that Jeffrey had
12 agreed to pay for your education?

13 A. Yes.

14 Q. Did you apply to any other
15 school besides FIT?

16 A. No.

17 Q. Do you know whether you met
18 the qualifications to get into FIT?

19 MR. GUIRGUIS: Objection,
20 form.

21 A. Yes.

22 MR. GUIRGUIS:
23 Comprehensibility.

24 MS. MENNINGER: She seemed
25 to understand it just fine.

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2 MR. GUIRGUIS: I don't know
3 if she did, but fine.

4 Q. Do you know how much FIT was
5 supposed to cost per year?

6 A. No.

7 Q. Did you believe it to be
8 expensive?

9 A. All schools are expensive.

10 Q. You had previously attended
11 Queen Margaret College; is that right?

12 A. Queen Margaret University.

13 Q. My apologies.

14 How much did Queen Margaret
15 University cost?

16 A. I can't remember.

17 Q. Did you apply for any
18 financial aid for FIT?

19 A. No. Jeffrey was covering
20 FIT.

21 Q. That's what Jeffrey told
22 you?

23 A. Multiple, multiple times.

24 Q. Did Ghislaine Maxwell say
25 anything to you with regards to FIT?

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2 A. It was various
3 conversations. It was known among
4 everyone that I was going to FIT, and
5 Jeffrey -- everyone knew he was
6 helping me to get into FIT. It was
7 common knowledge.

8 Q. You described earlier that
9 Ghislaine was helping review your
10 application and your essay.

11 Was there something else
12 that she was doing to help you?

13 A. Well, she said she would,
14 but whether she did, I have no idea.
15 She said she would. Whether she made
16 calls, I doubt, because I didn't end
17 up at FIT. So...

18 Q. Did you get accepted there?

19 A. I never heard from anyone at
20 FIT.

21 Q. You never got a response?

22 A. No.

23 Q. Did you have an email
24 address at that time?

25 A. Yes, I did.

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2 Q. Do you have a copy of your
3 FIT application?

4 A. I think it's somewhere. I
5 think it's in the email.

6 Q. There's an essay and then
7 there's an application, correct?

8 A. Yes, that's correct. I can
9 find the essay if you want.

10 MR. GUIRGUIS: I think we've
11 already produced that essay.

12 Q. While you were in South
13 Africa, did you have any phone
14 conversation with Ghislaine?

15 A. Yes.

16 Q. When was that?

17 A. Through various times
18 throughout my stay in South Africa.

19 Q. What phone were you using
20 while you were in South Africa?

21 A. I had the BlackBerry that
22 they had given me, and they also
23 phoned my parents' landline as well.

24 Q. Who is they?

25 A. Jeffrey, Ghislaine and

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2 [REDACTED] [REDACTED]

3 Q. Did Ghislaine speak to your
4 parents?

5 A. Yes.

6 Q. Who did she speak to?

7 A. I can't remember if she
8 spoke -- I can't remember, actually.
9 I can't remember who she spoke to.

10 Q. How do you know that she
11 spoke to your parents?

12 A. Because I remember it being
13 a huge thing, and my family -- because
14 they couldn't quite understand what
15 Jeffrey and Ghislaine were doing
16 paying for their daughter's education,
17 and they obviously thought --
18 suspected something was going on.

19 Q. So how do you know that
20 someone spoke to your parents?

21 A. Because my parents and I
22 fought about it.

23 Q. Did your parents tell you
24 that they spoke to Ghislaine?

25 A. I -- I can't remember. I

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2 remember having a huge row with my
3 family because they had spoken to --
4 so there were multiple phone calls
5 during the duration of that month,
6 okay. There's not a specific call.
7 There were multiple calls.

8 There were multiple emails.
9 I produced emails during that time
10 frame, back-and-forth emails between
11 [REDACTED] [REDACTED] and myself. So they
12 were -- they contacted me regularly.
13 Ghislaine, [REDACTED] [REDACTED] and Jeffrey
14 Epstein phoned me a few times.

15 Q. Did your parents tell you
16 that they spoke to Ghislaine?

17 A. I knew with my own -- that
18 they had spoken to Ghislaine.

19 Q. How did you know that?

20 A. Because I know that they had
21 spoken. They told me that they had
22 spoken. I know she made communication
23 with my family.

24 Q. Your family told you that
25 they had spoken to Ghislaine?

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2 MR. GUIRGUIS: Objection,
3 asked and answered.

4 A. Yes.

5 Q. Who in your family told that
6 you they had spoken to Ghislaine?

7 A. I can't remember whether it
8 was my stepmother or my father. I
9 cannot remember which one it was.

10 Q. What did your stepmother or
11 father tell you they had discussed
12 with Ghislaine?

13 A. That she had reassured them
14 that my education would be paid for
15 and -- basically that. You know, they
16 spent a lot of time and effort
17 reassuring my family they weren't
18 abusing me, which they were, and that
19 they weren't going to traffic me,
20 which they were.

21 So there you go. I had to
22 lie to my family.

23 Q. What is your stepmother's
24 name?

25 A. ████████████████████

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2 Q. And do you have an email
3 address or phone number for her?

4 A. No, I don't.

5 MR. GUIRGUIS: Objection.
6 No current information. Same
7 objection as at the outset of
8 deposition.

9 MS. MENNINGER: Are you
10 instructing her not to answer?

11 MR. GUIRGUIS: I am
12 instructing her not to answer.

13 Q. Where does [REDACTED] --

14 MR. GUIRGUIS: And I'm again
15 offering you to the opportunity
16 to proffer a reason for these
17 questions. And I --

18 MS. MENNINGER: I'll tell
19 you. Your client has signed an
20 affidavit and a complaint
21 discussing this conversation, and
22 I'm asking for contact
23 information for a witness to the
24 conversation, the person who
25 actually supposedly had a phone

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2 conversation with my client. And
3 you're telling me I can't follow
4 up with those witnesses.

5 Q. So please tell me how to
6 reach your stepmother, [REDACTED] [REDACTED]

7 A. I'm not going to offer you
8 my family's address details.

9 MR. GUIRGUIS: You don't
10 have to answer.

11 Go on.

12 [REDACTED] [REDACTED] come
13 back and answer it another day,
14 but...

15 Q. Where does [REDACTED] [REDACTED]
16 live?

17 A. She lives in Cape Town.

18 Q. Where in Cape Town?

19 A. I don't know.

20 Q. Have you been in touch with
21 her?

22 A. Not recently, no.

23 Q. When is the last time you
24 communicated with her?

25 A. A while back.

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2 Q. More than a year?

3 A. Less than a year.

4 Q. Is she still married to your
5 father?

6 A. I presume so.

7 Q. Have you talked to him in
8 the same period of time?

9 A. No.

10 Q. Why haven't you talked to
11 your family in more than a year?

12 MS. MCCAWLEY: Objection.

13 This is getting into her current
14 relationships, which is not
15 relevant to the case and also can
16 be used for harassment.

17 Q. Why haven't you talked to
18 your family in a year?

19 A. Because I came forward.

20 Q. When did you come forward?

21 A. October, around October.

22 Q. Have you spoken to your
23 family since October?

24 A. No.

25 Q. When was the last time you

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2 spoke to your father or stepmother
3 before October?

4 A. September.

5 Q. And did you tell them not to
6 contact you or did they tell you not
7 to contact them?

8 A. Well, I didn't -- I
9 basically said to them, either accept
10 me for who I am or we need to stop
11 this relationship.

12 Q. What did you mean by accept
13 you as you are?

14 A. I've made a lot of poor
15 choices, particularly Jeffrey, being
16 involved with Jeffrey Epstein. And
17 they feel I've come a long way from
18 that time, and they thought that they
19 didn't want me going back to a time
20 that was very traumatic for me.

21 Q. Did they tell you they would
22 not be in touch with you going
23 forward?

24 A. I didn't give them that
25 option for them to tell me that.

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2 Q. So your not having a
3 conversation with your father and
4 stepmother in a year is because of
5 your choice to come forward?

6 A. That's correct.

7 Q. What about your mother?

8 MR. GUIRGUIS: Objection to
9 form.

10 A. What about my mother?

11 Q. Have you had contact with
12 her in a year?

13 A. Yes.

14 Q. When was the last time you
15 had contact with your mother?

16 A. Last week.

17 Q. When you returned to New
18 York and moved in with [REDACTED] did you
19 talk to [REDACTED] about Jeffrey Epstein?

20 A. Yes.

21 Q. What did you tell [REDACTED]

22 A. I told him that I was
23 frightened.

24 He was incredibly concerned
25 about my weight loss and about the

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2 weight goal that Jeffrey and Ghislaine
3 set for me, which was 52 kilograms.
4 He was scared for me, actually.

5 Q. To your knowledge, did he
6 contact anyone about it?

7 A. Not to my knowledge.

8 Q. What did he do about his
9 concern, to your knowledge?

10 A. I begged him if I could live
11 with him, and he agreed.

12 Q. How long did you live with
13 him?

14 A. It wasn't really long,
15 because I moved in with him after
16 South Africa. So about a month or
17 something.

18 Q. From the time you returned
19 from South Africa to when you returned
20 to South Africa?

21 A. █. Yeah, no, we only kind
22 of went -- we only dated for briefly.
23 It wasn't a serious relationship.
24 Yeah. So when I moved to New York --
25 sorry, back to London, kind of our

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2 relationship couldn't really go
3 anywhere, I guess.

4 Q. The long distance?

5 A. Yeah, long distance doesn't
6 really work, so...

7 Q. So about the time you moved
8 back to London is when you and he
9 broke up?

10 A. That's correct.

11 Q. Have you had contact with
12 him since then?

13 A. I had contact with him again
14 in 2008.

15 Q. Did you come back to the
16 U.S. then?

17 A. No.

18 Q. You did not come back to the
19 U.S. in 2008?

20 A. ■, I did, sorry, for a
21 business trip. I went -- I did a
22 tour, yeah, from -- I think it was
23 Atlantic to Atlanta to San Francisco.

24 Q. With which business?

25 A. Belfairs International.

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2 It's a private company at that time
3 that did private planes, the interiors
4 of private planes.

5 (An off-the-record
6 discussion was held.)

7 Q. One more time. Can you
8 spell that?

9 A. Sorry. B-A-R- -- sorry, B-
10 -- sorry. It's getting so bad. I'm,
11 like, really bad at spelling. It's
12 B-E-L-F-A-I-R-S, Belfairs
13 International.

14 Q. You were working with them
15 in 2008?

16 A. Briefly.

17 Q. And you came for a business
18 trip?

19 A. Yes.

20 Q. And how long were you in the
21 U.S. on that occasion?

22 A. Gosh, I can't remember. It
23 was like a week.

24 Q. And who did you come with?

25 A. My manager of business.

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2 Q. What was that person's name?

3 A. [REDACTED]

4 Q. What's the last name?

5 A. I can't remember the last
6 name.

7 Q. So you came back to the U.S.
8 in 2008, but you did not have contact
9 with [REDACTED] on that trip?

10 A. No.

11 Q. When did you have contact
12 with [REDACTED] in 2008?

13 A. He moved to London in 2008.

14 Q. Did you see him in London?

15 A. Yes, I did.

16 Q. Where did you see him?

17 A. He came to stay with me in
18 London.

19 Q. Did you resume your
20 relationship?

21 A. Briefly.

22 Q. Is that the last time you've
23 had contact with him?

24 A. Yes.

25 Q. Was that about the time you

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2 became engaged to --

3 A. [REDACTED]

4 Q. -- [REDACTED]

5 A. [REDACTED] and I got together at
6 the end of 2008. We didn't meet and
7 then get engaged immediately. It was
8 like we dated and then got engaged.

9 Q. Understood.

10 In addition to discussing
11 Jeffrey with [REDACTED] is there someone
12 else you discussed Jeffrey with in
13 your life in 2006 or 2007?

14 A. Well, I discussed it with
15 everyone I knew. It's quite an amaz-
16 -- he's an amazing man. Yeah,
17 everyone I knew knew that I was
18 involved with Jeffrey Epstein.
19 Everyone that I met in New York knew
20 that I was affiliated with Jeffrey
21 Epstein and Ghislaine Maxwell.

22 Q. More specifically, who did
23 you tell that you had concerns about
24 your relationship with Jeffrey?

25 A. My friend [REDACTED] And there

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2 were a few other friends I had at the
3 time, but I don't remember their
4 names.

5 Q. Did you discuss it with

6 [REDACTED]

7 A. Yes.

8 Q. What did you tell [REDACTED]

9 A. Everything that Jeffrey did
10 to me. I told her every single detail
11 on how he abused me.

12 Q. How did Jeffrey abuse you?

13 A. There were times that I was
14 -- I mean, look, I was intimidated. I
15 was frightened of Jeffrey, okay. I
16 wanted to go to FIT, get an education.
17 But if I didn't comply with Jeffrey's
18 requests, I was scared. Okay?

19 So how did he abuse me?

20 When he had me on, like, the massage
21 table, I had no option. So how did he
22 abuse me? By putting a vibrator and
23 pushing it down on my clitoris for ten
24 minutes, that's abuse. That was not
25 pleasurable; that was exceptionally

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2 painful. He hurt me physically and he
3 abused me mentally, both.

4 Q. How did he abuse you
5 mentally?

6 A. Jeez. Well, I think the
7 fact that -- A, physical abuse always
8 leads to mental abuse. It's a fact.
9 So you can't physically abuse someone
10 and they can't be mentally, because
11 they will -- without a doubt, I'm sure
12 myself and all the other girls will
13 have suffered some form of
14 posttraumatic stress.

15 So in terms of how did he
16 mentally abuse me? He bullied me. He
17 went on about my weight. He
18 intimidated me. He promised me things
19 he didn't deliver. I mean, I could go
20 on. So...

21 Q. What things did he promise
22 you that he didn't deliver?

23 A. An education.

24 Q. And what do you know about
25 what he did or didn't do to get you an

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2 education?

3 A. Well, I didn't go to FIT, so
4 I presume not very much.

5 Q. Do you know why you didn't
6 get into FIT?

7 A. No, no. It just didn't ever
8 materialize.

9 Q. Did you ever contact FIT to
10 find out?

11 A. During that time, Jeffrey
12 had it in hand. I didn't think I
13 needed to contact anybody at FIT. I
14 mean, Jeffrey -- it was Jeffrey's
15 contact in the first place that he was
16 contacting. So I didn't contact
17 anyone at FIT.

18 Q. You didn't contact them at
19 all?

20 A. Well, no, because Jeffrey
21 said that he was going to do that for
22 me to get me into FIT.

23 Q. And how did you ever confirm
24 or deny that you weren't admitted to
25 FIT?

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2 A. I was never told. I was
3 never given a letter. I didn't have
4 anyone phone me. I didn't have the
5 contact that Jeffrey had been speaking
6 to about getting me in. She didn't
7 contact me. So I'm presuming as an
8 educated woman it was all hearsay,
9 because nothing ever materialized from
10 that.

11 Q. Did FIT have your address at
12 [REDACTED]'s?

13 A. Not that I recall.

14 Q. Did you give Jeffrey your
15 address at [REDACTED]'s?

16 A. Yes, Jeffrey knew where I
17 lived.

18 Q. I understood you were going
19 to live with [REDACTED] in order to get away
20 from Jeffrey.

21 A. So when -- so basically when
22 you live in someone's apartment, it's
23 a form of control. So when you don't
24 comply with their instructions all the
25 time, hundred percent, it's like

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2 leverage for them to control you.

3 I don't like being
4 controlled by people, especially by
5 someone like Jeffrey Epstein and
6 Ghislaine Maxwell.

7 So Jeffrey Epstein, he knew
8 where I was all the time, so...

9 Q. Did Jeffrey come to [REDACTED]'s
10 apartment?

11 A. He came around the Upper
12 East Side near the apartment, yes, he
13 did. There was an occasion that
14 Jeffrey Epstein picked me up when I
15 didn't go to the mansion.

16 Q. Picked you up where?

17 A. I can't remember the
18 location.

19 Q. Jeffrey lived on the Upper
20 East Side?

21 A. I can't remember where
22 Jeffrey -- his exact location is. I
23 mean, it's a nice -- I think it's near
24 5th. It's near 5th Avenue.

25 Q. Was it on the Upper East

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2 Side?

3 A. I think. I don't think it
4 was on the West Side. So hang on. So
5 5th Avenue is there. Is the West Side
6 that side?

7 I don't know -- sorry. I'm
8 really -- I'm a tourist, so I don't
9 know. I don't know where Jeffrey -- I
10 know that he's got -- it was near 5th
11 Avenue. That's where I know his
12 apartment was.

13 I'm not a New Yorker, so...

14 Q. Do you recall an occasion
15 while you were living with [REDACTED] that
16 Jeffrey came and picked you up?

17 A. Yes.

18 Q. Somewhere on the Upper East
19 Side?

20 A. Yes.

21 Q. You don't know where?

22 A. No, I don't know the
23 specific street, name or pavement that
24 I was standing on, no, I don't.

25 Q. Where did you go with

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2 Jeffrey when he picked you up on the
3 Upper East Side?

4 A. I got in his car and went
5 back to his mansion.

6 Q. What kind of car was it?

7 A. It was a -- I can't remember
8 what car it was.

9 Q. Who was driving the car?

10 A. He wasn't driving. I can't
11 remember who was driving.

12 Q. Was anyone else in the car?

13 A. Someone was driving the car.

14 Q. Anyone else?

15 A. I can't remember anyone
16 else.

17 Q. What was the purpose of your
18 going back to the mansion on that
19 occasion?

20 A. I don't know. You're going
21 to have to ask Jeffrey.

22 Q. Why did you get in the car?

23 A. Because I was frightened.

24 Q. What were you frightened of?

25 A. The fact that he had found

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2 me and wasn't supposed to know where I
3 was. So I was incredibly intimidated
4 that he drove up beside me and knew
5 where I was.

6 Q. You were somewhere out on
7 the street visible and he found you?

8 A. No. I was supposed to meet
9 Jeffrey. I was instructed to meet
10 Jeffrey. I failed to turn up to meet
11 Jeffrey and Jeffrey found me.

12 Q. Who instructed you to meet
13 Jeffrey?

14 A. It was one of the girls. It
15 was either [REDACTED] [REDACTED] or [REDACTED]
16 [REDACTED]

17 Q. How did they instruct you to
18 meet Jeffrey?

19 A. Via the BlackBerry they gave
20 me.

21 Q. You kept the BlackBerry
22 after you returned from South Africa?

23 A. Yes, I did.

24 Q. While you were living with
25 [REDACTED]

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2 A. Yes.

3 Q. Why did you keep the
4 BlackBerry after you were living with
5 ██████████

6 A. Because Jeffrey and I were
7 still in contact.

8 Q. What were you in contact
9 about? The FIT application?

10 A. He was trying to get me a
11 visa, and he -- he devised a way of me
12 getting -- I don't know what you call
13 it, sorry -- an apprenticeship, an
14 internship with a cosmetic company.
15 Yeah, a cosmetic agency, doctor's
16 medical facility.

17 Q. When you came back from
18 South Africa in February of 2007, did
19 you have a tourist visa?

20 A. Yeah, yes.

21 Q. So Jeffrey was trying to
22 help you get a job so you could get a
23 different kind of visa?

24 A. Yeah. Well, you can't live
25 in New York on a tourist visa. It's

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2 three months, so -- so I don't know
3 what it's like anymore, the laws. But
4 back then, if you wanted to tour
5 America, you would go and fill -- I
6 think it was 90 days, but then you
7 would have to leave. You couldn't
8 stay.

9 And Jeffrey was trying to
10 get me a -- it's difficult, not
11 being -- it's difficult actually going
12 to university here if you don't have a
13 British -- I don't know the system. I
14 just didn't have a visa I could go to
15 FIT.

16 And this friend of his that
17 owned a cosmetic surgery, he had
18 organized that I would go in and do an
19 internship, and that way would be a
20 legitimate way to -- for me to get a
21 visa, for me to stay and continue in
22 FIT. If that makes sense.

23 Q. What was the name of that
24 friend?

25 MR. GUIRGUIS: Do you need a

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2 break?

3 THE WITNESS: I do, sorry.

4 Do you mind?

5 MS. MENNINGER: There was a
6 question pending.

7 MR. GUIRGUIS: She has a
8 question pending. You can answer
9 that, then. Go ahead.

10 What was the name of that
11 friend?

12 THE WITNESS: I don't know.
13 It was a man.

14 Q. Did you end up working in
15 that internship?

16 A. No.

17 Q. Did you ever meet with that
18 man?

19 A. Yes.

20 Q. Why didn't you end up
21 working in that internship with that
22 man?

23 A. I wanted to return home.

24 MR. GUIRGUIS: Can we take
25 that break?

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2 MS. MENNINGER: Yes.

3 (Time noted: 3:04 p.m.)

4 (Recess.)

5 (Time noted: 3:20 p.m.)

6 MS. MENNINGER: Going back
7 on the record.

8 MR. GUIRGUIS: Before you
9 proceed with your questions,
10 Counsel, I raised an objection to
11 providing [REDACTED] [REDACTED]'s email
12 address before. Then you
13 proffered a reason for it.

14 I accept your proffer and I
15 will provide you that email
16 address now, or have the witness
17 do it.

18 MS. MENNINGER: Okay.

19 THE WITNESS: It's

20 [REDACTED]

21 (An off-the-record
22 discussion was held.)

23 MR. GUIRGUIS: And let the
24 record reflect she's taking it
25 down from a Google search on the

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2 web. She believes that's right.

3 Q. What is your father's email
4 address?

5 A. I don't remember it offhand.

6 MS. MENNINGER: Can you mark
7 this.

8 (Defendant's Exhibit 3,
9 affidavit, was marked for
10 identification.)

11 Q. Do you recognize the
12 document we marked as Defendant's
13 Exhibit 3?

14 A. Yes.

15 Q. What is it?

16 A. My affidavit.

17 Q. Who wrote this affidavit?

18 A. Well, I -- I -- I didn't
19 type it up, but I gave the affidavit.

20 Q. So you spoke words to
21 someone else and they typed it?

22 A. Yes.

23 Q. Who was that person?

24 A. I don't know.

25 Q. Who was the person you gave

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2 words to?

3 MR. GUIRGUIS: Was it an
4 attorney?

5 THE WITNESS: Yes.

6 MR. GUIRGUIS: Okay.

7 Q. Which attorney?

8 MR. GUIRGUIS: I think I'm
9 going to object to that. I don't
10 know that it matters which
11 attorney or which attorney
12 provided the work or did specific
13 tasks. I think that's
14 privileged.

15 Q. Did you communicate these
16 words to a attorney with the intent
17 that they would put it into an
18 affidavit that you would share
19 publicly?

20 A. I don't know that the
21 affidavit is public, but to share
22 with -- with you guys.

23 Q. With a third party?

24 A. Yeah, with a third party.

25 Q. And you knew that at the

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2 time you were giving the words to the
3 person to type up?

4 A. Yeah, to give to you guys.

5 Q. So who was the person that
6 you were speaking to that took down
7 the words for your affidavit?

8 A. Sorry. It was Stan and
9 Brad.

10 Q. And when did you have that
11 conversation with them?

12 A. I think it was either -- I
13 think it was in January.

14 Q. Last month?

15 A. █, God. Last month. Yeah,
16 last month.

17 Q. In person?

18 A. In person.

19 Q. Did they give you multiple
20 drafts of this document?

21 A. I wouldn't say multiple, but
22 I made sure that it was accurate.

23 Q. Did you make any changes to
24 the document you were originally
25 presented with?

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2 A. No.

3 Q. The first document that you
4 were presented with, is that the one
5 that you signed?

6 A. Yes.

7 Q. And nothing was changed
8 after you reviewed it?

9 A. No.

10 Q. Is that your signature on
11 the second page?

12 A. Yes, that is my signature.

13 Q. And the last page, is that
14 the official in Spain who witnessed
15 your signature?

16 A. Yes.

17 Q. Did you sign page 2 in front
18 of the person indicated on page 3?

19 A. Yes.

20 Q. Did you present that person
21 with some form of identification?

22 A. Yes.

23 Q. What form of identification
24 did you present?

25 A. My passport.

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2 Q. Which passport?

3 A. My British passport.

4 Q. Is that a current British
5 passport?

6 A. Yes.

7 Q. Did you have a British
8 passport that expired in 2014?

9 A. Yeah, I can't remember when
10 it expired, but I think you guys have
11 a copy as well of my passport. I
12 don't remember the exact date that it
13 expired.

14 Q. Not the South African
15 passport that was stolen?

16 A. The South African passport
17 is completely irrelevant. You can't
18 travel on a South African passport.
19 It's -- you can't go into any other
20 country bar South Africa, other than
21 South Africa, on a passport. So I've
22 hardly used my South African passport
23 at all.

24 Q. I'm just asking which
25 passport you showed to the person on

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2 page 3.

3 A. Sorry. My British passport.

4 Q. And it's a British passport
5 that's current?

6 A. Yes.

7 MR. GUIRGUIS: Asked and
8 answered.

9 MS. MENNINGER: Just a bit
10 of a detour.

11 Q. Can I have you take a look
12 at paragraph 1?

13 A. Yep.

14 Q. Is paragraph 1 true?

15 A. "I am currently over the age
16 of 18," paragraph 1, yes.

17 Q. And you presently reside in
18 Spain?

19 A. Yes.

20 Q. Paragraph 2, you state, "In
21 the summer of 2006, when I was
22 22 years old and living in New York, I
23 was introduced to Jeffrey Epstein by a
24 girl I had met named [REDACTED]

25 [REDACTED]"

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2 Is that true?

3 A. Yes.

4 Q. Was it the summer of 2006
5 when you met [REDACTED]

6 A. Okay, well, it was summer.
7 End of summer going into fall.

8 Q. So when was it, do you
9 think?

10 A. It was fall of 2006. It was
11 just after the summer.

12 Q. So it was the fall of 2006
13 when you met [REDACTED]

14 A. Well, it was the end of the
15 summer, so I don't know -- fall or in
16 the summer or -- it was end of summer,
17 fall.

18 Q. Sometime after you came into
19 the U.S.?

20 A. Yes, yeah.

21 Q. And do you know when in the
22 fall of 2006 you met [REDACTED]

23 A. What, you mean the end of
24 summer/fall slash -- if you really
25 want to go -- can you define, like,

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2 geography lessons? Should we do

3 geography lessons?

4 MS. MCCAWLEY: All right.

5 Hang on a second.

6 A. Maybe summer? Fall?

7 Winter? What are your dates here in

8 New York?

9 MR. POTTINGER: Can we get

10 this clear?

11 MR. PAGLIUCA: Would you

12 just stop it?

13 MR. POTTINGER: Do you mind?

14 Do you mind?

15 MR. PAGLIUCA: I mind you

16 talking.

17 MR. POTTINGER: Do you mind?

18 MS. MENNINGER: If you want

19 to enter an objection, please do

20 so.

21 MR. POTTINGER: I object.

22 MS. MENNINGER: What is the

23 basis of your objection, Mr.

24 Pottinger?

25 MR. POTTINGER: Define

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2 summer or fall.

3 MS. MENNINGER: I will do
4 whatever I want during my
5 deposition.

6 MR. POTTINGER: Define --
7 define summer or fall.

8 MS. MENNINGER: I don't have
9 to define anything.

10 MR. POTTINGER: Define
11 summer or fall for the client --

12 MS. MENNINGER: All right.

13 MR. POTTINGER: -- and then
14 we will answer the -- she will be
15 able to answer the question.

16 MS. MENNINGER: I'm going
17 off the record until you calm
18 down.

19 Let's go off the record.

20 (Time noted: 3:28 p.m.)

21 (Recess.)

22 (Time noted: 3:30 p.m.)

23 MS. MENNINGER: Go back on
24 the record.

25 Q. Approximately what month and

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2 day did you meet [REDACTED] [REDACTED]

3 A. As I said earlier, I can't
4 remember what day, but it was end of
5 summer/fall in the United States. I
6 can't remember what specific date or
7 time that was.

8 Q. What month? Any idea?

9 A. It was September.

10 Q. When did you meet Jeffrey
11 Epstein?

12 A. Shortly after I met [REDACTED]

13 Q. Was that also in September?

14 A. I guess so. I don't know
15 the exact date I arrived, so if
16 someone can provide me with my
17 passport so I can see my entry date,
18 maybe that would help.

19 So I met [REDACTED] -- if you
20 look at the date that I arrived in New
21 York on my passport, I think it's very
22 clear when I arrived. You've got the
23 evidence, I'm sure.

24 So two weeks after the date
25 that is on my passport that I arrived

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2 in, I met [REDACTED] Very soon after I
3 met [REDACTED] I was introduced to
4 Jeffrey Epstein. It was in and around
5 September. I can't specifically
6 remember the date, time, season,
7 whatever.

8 Q. Did you show your passport
9 to Mr. Pottinger and Mr. [REDACTED] when
10 you were standing there at the
11 consulate having the affidavit
12 notarized?

13 A. I showed my current passport
14 when I had this signed.

15 Q. Not the passport that
16 contained dates from 2006?

17 A. My current valid passport.
18 You can only show a valid passport.

19 Q. Fair enough.

20 So you believe that your
21 lawyers have produced your current
22 valid passport to me?

23 A. No --

24 MS. MCCAWLEY: Objection.

25 A. -- they have not produced my

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2 current passport. They produced have
3 my passport during that time frame,
4 which clearly shows that -- when I
5 entered the United States.

6 Q. So when your lawyers wrote,
7 "A copy of nonparty [REDACTED]
8 current passport is attached hereto as
9 [REDACTED] 157 to 168, which should be
10 treated as confidential pursuant to
11 the party's protective order," do you
12 believe that to be an accurate
13 statement?

14 MS. MCCAWLEY: Objection.
15 You're asking her legal
16 information that she's not privy
17 to.

18 MS. MENNINGER: There was
19 nothing legal about that comment.

20 A. Sorry. That makes no sense
21 to me, please. Can you repeat the
22 question.

23 Q. I'll do it this way.

24 MS. MENNINGER: Defendant's
25 Exhibit 4.

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2 (Defendant's Exhibit 4,

3 [REDACTED], was marked for
4 identification.)

5 Q. Take a look at Defendant's
6 Exhibit 4.

7 A. Okay.

8 Q. Just take a look at it. Do
9 you recognize it?

10 A. Yeah, this is my passport.

11 Q. Do you know which passport
12 this is?

13 A. This is my old passport.

14 Q. So it's not your current
15 passport, correct?

16 A. No, it's not my current
17 passport, because it expired on --
18 let's have a look here --

19 Q. Can you turn to the
20 second-to-last page. Sorry.

21 A. Yes, here we go.

22 Q. Does that have a [REDACTED]
23 number? In other words, your name,
24 [REDACTED], with an underscore and then
25 page numbers after that, that were

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2 placed there by your attorneys.

3 A. Hmm, sorry. I don't
4 understand.

5 Q. Do you see at the bottom of
6 that page, your name, [REDACTED]?

7 A. Yes.

8 Q. All right. And that's on a
9 document that is an expired passport?

10 A. Yes.

11 Q. This is not your current
12 passport?

13 MR. GUIRGUIS: Objection,
14 asked and answered.

15 A. No.

16 Q. You have another passport
17 that's not this passport that's
18 currently in effect?

19 MR. GUIRGUIS: Objection,
20 asked and answered.

21 Q. Correct?

22 A. Yes.

23 Q. If I could also have you
24 take a look at -- and I'll have to
25 show, if you can see, there are the

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2 passport page numbers --

3 A. Mm-hmm.

4 Q. -- that show up on a
5 passport.

6 A. Yeah.

7 Q. And these have been put in
8 some order.

9 A. Mm-hmm, the order of my
10 passport, yes.

11 Q. Right. That's not how they
12 were produced, but that's the order
13 they're in now.

14 A. Okay.

15 Q. If we could have you turn to
16 ████████ 162, which is page 16 of your
17 passport.

18 MR. GUIRGUIS: Is that the
19 front -- sorry, 162.

20 MS. MENNINGER: They're not
21 in ██████ order. They're put in
22 the order of the passport.

23 THE WITNESS: █████, yeah.

24 Mm-hmm.

25 MS. MENNINGER: It's page

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2 16.

3 Q. Do you see on that page a
4 stamp from the Department of Homeland
5 Security of the U.S., dated
6 October 19, 2006?

7 A. Mm-hmm.

8 Q. Does that indicate to you
9 that you were admitted to visit the
10 U.S. on October 19th of 2006?

11 A. Yes, it does.

12 Q. Do you believe October 19th
13 is during the summer in the U.S.?

14 A. No. I don't see the
15 relevance.

16 Q. What season do you think
17 October 19th is in the U.S.?

18 A. Okay. Well, considering I
19 arrived in September, October's in
20 winter. But I arrived in September.

21 Q. Okay. Well, do you believe
22 that you did not enter the U.S. on
23 October 19th, 2006?

24 A. Well, it's stamped.

25 Q. Does it say "admitted"?

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2 A. "Admitted," yes.

3 Q. Does it say "October 19,
4 2006"?

5 A. Yes.

6 Q. Does it say "Department of
7 Homeland Security, U.S. Customs and
8 Border Patrol"?

9 A. Yes.

10 Q. So you do or do not believe
11 you were admitted to the United States
12 on October 19, 2006?

13 A. I flew in and had my
14 passport stamped after I went on my
15 trip to London in the UK.

16 Every time you go into a --
17 as you all know, using your passport,
18 every time you go into a new country,
19 if you don't have their passport, you
20 get a stamp. So if you go in several
21 times, every time you go into that new
22 country, it gets stamped.

23 Q. So you think you went on a
24 trip in October and came back to the
25 U.S. on October 19th?

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2 A. I obviously went -- I
3 arrived in New York a day on the 19th
4 of October.

5 Q. Where were you coming from
6 on October 19th?

7 A. I can't remember.

8 Q. You have no idea?

9 A. I think it was London. I
10 made a trip to London.

11 Q. And how long were you in
12 London in October?

13 A. I can't remember.

14 Q. A week?

15 A. I can't remember.

16 Q. Who paid for that ticket?

17 A. Myself.

18 Q. Did you go with anyone?

19 A. No.

20 Q. Did you have a new 90 days
21 that began on October 19th?

22 A. Yes. It automatically
23 starts every time you enter.

24 Q. So in order to be compliant
25 with that visa, you needed to leave

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2 within 90 days of October 19th?

3 A. That's correct.

4 Q. Do you know which airline
5 you flew to London in 2006?

6 A. I can't remember.

7 Q. Do you know which class of
8 service you flew?

9 A. I can't remember.

10 Q. Where is your current
11 passport right now?

12 A. It is in my hotel room.
13 Here, in -- it's in my hotel room.

14 Q. Got it.

15 Did [REDACTED] fly with you to
16 London?

17 A. No.

18 Q. Did Jeffrey pay for you to
19 go to London?

20 A. I can't remember.

21 Q. Do you know whether you had
22 met Jeffrey before you went to London
23 in October of 2006?

24 A. I had met Jeffrey by then.

25 Q. Do you have any emails or

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2 anything reflecting your travel plans
3 on that trip?

4 A. [REDACTED], I think there was a
5 plane, I think there was a plane
6 booking or something.

7 Q. For that trip to London in
8 October of 2006?

9 A. I think so. I would have to
10 double check.

11 Q. Where would you check?

12 A. Well, I'm trying to go and
13 find it in my email, my old email
14 account, where all of my other emails
15 exchanged between [REDACTED] [REDACTED] and
16 [REDACTED] [REDACTED] are.

17 Q. Do you have any frequent
18 flyer accounts?

19 A. No.

20 Q. Did your first trip to the
21 private island in the U.S. Virgin
22 Islands before or after you went to
23 London and returned?

24 A. What was the date in October
25 again? 19th. I can't remember. I

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2 mean, I said earlier I can't remember
3 the first time.

4 Q. In the next sentence you
5 say, "After that first trip, I
6 traveled to the island several more
7 times, usually on one of Jeffrey's
8 private airplanes, and always at his
9 direction."

10 What do you mean by "always
11 at his direction"?

12 A. Well, I wasn't going to go
13 there on my own, so I would have to be
14 invited first. I didn't want to just
15 go chill on my own. It was Jeffrey's
16 house, so he had to phone me and
17 invite me before I decided I wanted to
18 go to his island.

19 Q. So he phoned you, he invited
20 you, and you decided you wanted to go
21 to his island.

22 A. No, I had to go to his
23 island.

24 Q. Why did you have to go to
25 his island?

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2 A. Because I was frightened of
3 him.

4 Q. Did Jeffrey ever hit you?

5 A. No, he didn't.

6 Q. Did you ever see Jeffrey
7 with a weapon?

8 A. No.

9 Q. Have you reviewed any flight
10 logs?

11 A. No, not that I recall.

12 Q. You've never seen a flight
13 log?

14 A. I've seen one which showed
15 my name.

16 Q. When did you first become
17 frightened of Jeffrey Epstein?

18 A. During my time with him in
19 New York.

20 Q. What period of time?

21 A. Pretty much soon after I met
22 him, actually, and he forced the
23 vibrator on my vagina for an extended
24 period of time, which considerably
25 hurt my lady region, actually.

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2 Q. That's when you became
3 frightened of him?

4 A. Yes, absolutely.

5 Q. You've seen a flight log
6 with your name on one flight?

7 A. Yes, I have.

8 Q. When did you see that?

9 A. I saw it in January, and it
10 was to confirm that --

11 MR. GUIRGUIS: I'm going to
12 object. Hold on.

13 Is this -- if this is a
14 communication with counsel, you
15 should understand, any time she
16 asks you a question, if the
17 answer is it was with counsel,
18 then you don't answer.

19 Was this with counsel?

20 THE WITNESS: Yes.

21 MR. GUIRGUIS: Don't answer.

22 MS. MENNINGER: Seeing a
23 document when you're with counsel
24 is privileged?

25 MR. GUIRGUIS: I don't know

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2 what your next question is going
3 to be, so...

4 MS. MENNINGER: I asked her
5 when she saw the flight logs.
6 And she said in January, correct?

7 MR. GUIRGUIS: Right. And
8 then she was about to continue
9 the answer. I'm fine with the I
10 saw it in January. That's why I
11 didn't object when you asked the
12 question.

13 I'm objecting to her
14 continuing and caution the
15 witness not to waive her
16 attorney/client privilege.

17 Q. Don't tell me anything that
18 your lawyer said to you.

19 You reviewed the flight log
20 in January?

21 A. I reviewed one flight log,
22 which confirmed that I was there.

23 Q. What other documents did you
24 review?

25 A. No other documents.

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2 Q. In addition to Jeffrey and
3 [REDACTED] what other girls did you have
4 sexual relations with on the island?

5 A. I can't remember their
6 names.

7 Q. Can you remember any of
8 their names?

9 A. There were a few.

10 Q. Can you remember any of
11 their names?

12 A. [REDACTED] -- sorry, I
13 misunderstood your question. I didn't
14 have sexual relations with [REDACTED]
15 Sorry, I misunderstood you.

16 It was [REDACTED] and
17 [REDACTED] And there were a couple
18 others, I don't remember their names.

19 Q. What are other guests did
20 you have sexual relations with on the
21 island?

22 A. It was only those ones.

23 Q. Do you know the ages of any
24 of the individuals you had sexual
25 relations with on the island?

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2 A. They were 18, I assumed.

3 [REDACTED] was around my age, was my age.

4 Q. In the next paragraph, you
5 refer to meeting Ghislaine Maxwell on
6 one of your visits to the island,
7 correct?

8 A. Correct.

9 Q. You said, "Watching her
10 interact with the other girls on the
11 island, it became clear to me that she
12 recruited all or many of them to the
13 island."

14 What do you mean that?

15 A. That she recruited a lot of
16 the girls.

17 Q. What did you see?

18 A. I saw how she interacted
19 with all the girls. You know, if you
20 walk into any -- I mean, common
21 sensewise, if you walk into a firm,
22 you kind of know who the boss is.

23 You know, all the girls kind
24 of reported to Ghislaine. Ghislaine
25 was like the mama bear, if you know

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2 what I mean. She called the shots; we
3 had to listen to Ghislaine.

4 And Ghislaine was Jeffrey's
5 right-hand woman, so, you know,
6 whatever Jeffrey wanted went through
7 Ghislaine and then filtered through.

8 Q. What did any girl report to
9 Ghislaine in your presence?

10 MR. GUIRGUIS: Objection.

11 I'm not sure that's -- just
12 objection to form.

13 Q. You said that the girls
14 reported to Ghislaine. What did you
15 see or hear that caused you to say
16 that?

17 A. Well, it's pretty obvious.
18 I mean, Ghislaine called the shots.

19 So, for example, when -- I
20 can't remember specifics, but [REDACTED]
21 I think, had an issue. And she had to
22 speak to Ghislaine if there was ever
23 an issue.

24 Q. What issue?

25 A. I can't remember

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2 specifically. We always have issues.
3 Girls have issues. We have period
4 pains, we've got headaches.

5 You know, we had to look a
6 certain way for Jeffrey. So if we put
7 on a little bit of weight or, for
8 example, if my hairstyle was wrong --
9 Jeffrey liked girls to look a certain
10 way.

11 So, for example, there was
12 one occasion where Jeffrey didn't like
13 my hair and Ghislaine told me to
14 change it.

15 So there was -- everyone was
16 afraid of Ghislaine. All the girls
17 were afraid of her, so everyone --
18 [REDACTED] [REDACTED] reported to her. [REDACTED]
19 [REDACTED] reported to her. I don't know
20 how to tell you.

21 So when I say reporting, I
22 witnessed with my own two eyes [REDACTED]
23 [REDACTED] reporting to Ghislaine in front
24 of me, but I can't remember specifics.
25 They were talking about girls. I

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2 can't remember the specific
3 conversation. But every single person
4 100 percent, 200 percent reported to
5 Ghislaine. 100 percent.

6 Q. Okay. Great. I appreciate
7 your certainty.

8 A. Absolutely.

9 Q. So we have [REDACTED] [REDACTED]
10 having a discussion with Ghislaine
11 about girls. What other discussions
12 did you overhear?

13 A. There were various
14 discussions. We were always talking
15 about girls. There was a constant
16 influx of girls. There were so many
17 girls. There were girls in Miami.
18 There were guests coming. There
19 were --

20 It's like, I'm sure if you
21 go into a [REDACTED] brothel and see how
22 they run their business, I mean, it's
23 just general conversation about who's
24 going to have sex with who and, you
25 know -- what do you talk about when

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2 all do you is have sex every day on
3 rotation? I mean, what is there to
4 talk about?

5 Q. You were in Miami? When did
6 you go to Miami?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. No, I didn't go to Miami. I
10 didn't say that.

11 Q. Apart from general
12 conversation, do you recall any
13 specifics of any female reporting to
14 Ghislaine?

15 A. Yes, I saw. And with my own
16 eyes, I saw how Ghislaine and [REDACTED]
17 [REDACTED] and the other girls reported to
18 them.

19 If you would like me to
20 report specific conversations, I
21 can't. But in my being an adult and
22 having common sense and a sensible
23 head on my shoulders, you can quite
24 quickly work out who is the management
25 there.

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2 And we were told by Jeffrey
3 Epstein to listen to Ghislaine. So
4 Ghislaine was the main right-hand
5 woman of Jeffrey Epstein. We were
6 told by Jeffrey Epstein to listen to
7 Ghislaine.

8 Q. When did Jeffrey Epstein
9 tell you that?

10 A. I can't remember the exact
11 time, date or where I was standing, on
12 which pavement or crack. But it was
13 around the time that I met Ghislaine.

14 Q. Which was on the island?

15 A. I can't remember what date,
16 time, pavement, where I was standing.
17 But I was told during around the time
18 I met Ghislaine that I had to listen
19 to Ghislaine.

20 Q. By Jeffrey?

21 A. By Jeffrey. And every
22 single other girl that I've ever met
23 with Jeffrey.

24 Q. And we know three names, but
25 that's it?

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2 A. Those are three names that I
3 remember, but I met -- I met lots of
4 girls. Lots.

5 Q. Okay.

6 A. Yeah.

7 Q. What activities was
8 Ghislaine Maxwell in charge of?

9 A. In terms of -- can you
10 explain activities, please?

11 Q. I'm actually just looking at
12 your affidavit on paragraph 3, so why
13 don't you take a look at that.

14 A. Activities. Activities. So
15 when we had to go to the island, when
16 we had to go see Jeffrey in New York,
17 when we had to go to his mansion.

18 You know, we saw Jeffrey
19 pretty regularly. I was on rotation
20 pretty much every day, so -- amongst
21 other girls.

22 So Ghislaine also called
23 me -- she also called the other
24 girls -- when Jeffrey wanted his
25 massage. So there was an occasion

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2 that I didn't want to go, and she got
3 angry with me because I didn't want to
4 give Jeffrey a massage.

5 Q. When was that?

6 A. It was on one of my -- one
7 of my stays on the island. I can't
8 remember what specific date or what
9 specific time.

10 Q. How many times were you on
11 the island with Ghislaine?

12 A. I can't remember
13 specifically.

14 Q. More than once?

15 A. Yeah.

16 Q. More than twice?

17 A. I can't remember. I also
18 saw her in New York quite a lot, so --
19 I mean, this isn't just based on the
20 island. I spent just as much time
21 with Jeffrey and Ghislaine in New
22 York, so we can't just concentrate on
23 the island, please.

24 Q. Did you believe Ghislaine
25 was living in New York in January of

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2 2007?

3 A. I don't know where the hell
4 Ghislaine lived, to be honest.

5 Q. But you saw her regularly in
6 January of 2007?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. Regularly, what's regularly?
10 I saw her a few times. I don't know
11 where she was living. I tried to
12 actually not spend -- well, I tried to
13 spend as little time with her as
14 possible because every time I saw her
15 on the island, she would call me to
16 give Jeffrey a massage, so...

17 Q. You saw her more than once
18 on the island and you saw her a few
19 times in New York. Did you see her
20 anywhere else?

21 MR. GUIRGUIS: Objection.

22 MS. MCCAWLEY: Objection,
23 mischaracterizes testimony.

24 A. No.

25 Q. In New York, you saw her at

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2 Jeffrey's office. Did you see her
3 anywhere else in New York?

4 A. I can't remember. I saw
5 them, I spent a lot of time with them,
6 so...

7 Q. How much time did you spend
8 with Ghislaine?

9 A. Enough.

10 MR. GUIRGUIS: Objection.

11 That's vague.

12 A. Enough time. I mean, how
13 long is a piece of string? I was here
14 for a certain amount of time, and in
15 that time, the majority of the time I
16 spent with Jeffrey Epstein being
17 involved with his pedophiling -- I
18 mean, how much time have you spent
19 with him? I don't know. It wasn't a
20 lot of time, because I couldn't stand
21 the woman and she was a bully and no
22 one liked her, so no one really went
23 out of their way to spend time with
24 her.

25 So I didn't spend a lot of

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2 time with her because she's a
3 particularly unpleasant person. And
4 when I did spend time with her, it was
5 either directing me to massage Jeffrey
6 or her showing me how to massage
7 Jeffrey, or I spent a lot of time with
8 her on the island.

9 Yeah, so how much time did I
10 spend with Ghislaine in total of
11 hours? I can't recall because it was
12 ten years ago. I mean, how many hours
13 did I spend with Jeffrey? I mean,
14 what a silly question.

15 Q. How many days did you see
16 Ghislaine?

17 A. Don't know.

18 Q. Less than ten or more than
19 ten?

20 A. I can't remember.

21 Q. Less than five or more than
22 five?

23 A. Can't remember.

24 Q. You indicate that many girls
25 you saw appeared to be young

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2 teenagers. Where did you see young
3 teenagers?

4 A. It says they appeared to be
5 teenagers. All the girls I saw looked
6 young.

7 Q. Okay. Where did you see
8 girls who appeared to be young
9 teenagers?

10 A. On the island and in New
11 York.

12 Q. Describe for me a young
13 teenager that you saw.

14 MR. GUIRGUIS: Objection,
15 mischaracterizes testimony.

16 A. So I never said I saw a
17 teenager. They appeared to look like
18 teenagers, okay? [REDACTED] was -- I try
19 to look at [REDACTED] I don't know how
20 old [REDACTED] is, but she looked young.
21 And I'm sure you can agree, as a mom,
22 in the photos, that she looks pretty
23 young for an old man to be bonking.
24 So she looks really young. She looks
25 younger than me.

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2 Q. Did you see her bonk
3 someone?

4 A. No, but she told me. She
5 told me and [REDACTED] that they abused her
6 on the island.

7 Q. [REDACTED] said they abused who
8 on the island?

9 MR. GUIRGUIS: Objection,
10 mischaracterizes testimony.
11 That's not what she said.

12 A. [REDACTED] said that Jeffrey
13 and [REDACTED] had abused her.

14 Q. Okay. And do you have any
15 way to reach [REDACTED]

16 A. I haven't spoken to her. I
17 don't -- I just know her first name.

18 Q. You said you recall seeing
19 "a particularly young, thin girl who
20 looked well under 18," and you recall
21 asking her her age.

22 When did you see this
23 particularly young, thin girl who
24 looked well under 18 and you recall
25 asking her age?

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2 A. It was on the trips. I
3 think you've got the photos. [REDACTED]
4 is in the photos. So it was that trip
5 in December.

6 Q. Did you take a photo of the
7 young, thin girl who looked well under
8 18?

9 A. I think I did take a photo
10 of her. I don't have any more photos
11 of her of my own.

12 Well, I have photos of her.
13 You've got the photos.

14 Q. So the person --

15 A. I've given you all the
16 photos that I have.

17 Q. The person that you wrote
18 here was "a particularly young, thin
19 girl who looked well under 18" is
20 reflected in photographs you've
21 produced in this case?

22 A. That's correct.

23 Q. And do you know her name?

24 A. Sorry, can you just repeat
25 that? Didn't I just answer this

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2 question?

3 Yeah, that's [REDACTED] who I
4 was particularly concerned about,
5 about her age, in the photos that I
6 have supplied with -- you with, with
7 me in them with [REDACTED]

8 Q. So in your affidavit in
9 paragraph 3 where you talk about "a
10 particularly young, thin girl who
11 looked well under 18," you are
12 referring to [REDACTED]

13 A. Yes.

14 Q. And you said you later
15 learned she was a [REDACTED]

16 A. That's correct.

17 Q. How did you learn she was a
18 [REDACTED]

19 A. Because she told me. And
20 she told me Jeffrey Epstein was
21 funding her [REDACTED] [REDACTED]

22 Q. And where was her [REDACTED]
23 [REDACTED]

24 A. I don't know.

25 Q. When did she tell you this?

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2 A. During that December trip.

3 Q. Was that the only trip you
4 took with her?

5 A. I can't -- I can't remember.
6 I think there was another trip, but I
7 can't remember.

8 Q. Did you ever see her name on
9 a flight log?

10 A. No.

11 Q. Was she on the plane with
12 you?

13 A. I can't -- I can't remember.
14 I can't remember. Yeah, I just
15 remember [REDACTED] on the island.

16 Q. Other than her telling you
17 she was a [REDACTED] did she tell you
18 anything else about herself?

19 A. Yeah, you know, I think she
20 came from quite a tough background.

21 Q. What did she say?

22 A. Well, I can't remember the
23 specifics, but I remember that -- I
24 don't know if she had issues with her
25 parents -- I don't know. She was a

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2 bit of a -- you know, she was a -- I
3 was worried about her.

4 Q. What did she say to cause
5 you to be worried about her?

6 A. Well, I first met her -- she
7 was new to Jeffrey Epstein's list of
8 girls in December. And when I first
9 met her, she was a really bubbly girl
10 and -- I mean, she was young. She was
11 inexperienced. She -- she was frail.
12 And she changed quite quickly after
13 that first trip.

14 Q. How many trips did you take
15 with her?

16 A. I think it was more than
17 one. I can't remember. I saw her a
18 lot.

19 Q. Where did you see her?

20 A. █, it was either New York
21 or the island. I mean, I can't
22 remember.

23 Q. In New York, where did you
24 see her?

25 A. I think we met -- like we

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2 all met a couple times in New York.

3 We all kind of knew each other.

4 Q. Did you ever see her [REDACTED]

5 A. No.

6 Q. Did she live in an apartment
7 that you went to?

8 A. I can't remember about her
9 living arrangements.

10 Q. Do you know where her [REDACTED]

11 [REDACTED] was?

12 A. No.

13 Q. When did you ask to see her
14 passport?

15 A. When we shortly arrived to
16 the Virgin Islands, she looked
17 particularly young. And you know what
18 girls are like with passport -- with
19 passport pictures. They don't -- they
20 get embarrassed about their passport
21 pictures.

22 And she was quite cagey
23 about her passport, so she didn't show
24 me. I don't know whether that -- I
25 don't know. She just didn't show me.

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2 Q. Did she say why she wasn't
3 showing it to you?

4 A. She said it was because she
5 was embarrassed about the picture.

6 Q. Were you living in the same
7 room with her on the island?

8 A. Yeah, we stayed in the same
9 room.

10 Q. Did you ever attempt to look
11 at her passport when she wasn't there?

12 A. No.

13 Q. Did you ever call any
14 authorities about having seen this
15 young, thin girl who looked well under
16 18?

17 A. No.

18 Q. In the fourth paragraph, you
19 described being lent out to Jeffrey's
20 friends in New York.

21 Which friends of Jeffrey's
22 were you lent out to to have sex?

23 A. Alan Dershowitz.

24 Q. Who else?

25 A. [REDACTED] All the girls that

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2 were involved, really. I had to have
3 sex with them, so...

4 Q. Well, what do you mean by
5 lent out?

6 A. Lent out as in -- so I was
7 one of the girls that regularly --
8 that Jeffrey regularly asked to see
9 sexually.

10 And what my description was
11 of being lent out is when -- it's
12 almost like Jeffrey's quite possessive
13 of his girls. He's -- you know, he
14 lends them out.

15 He samples the girls, he has
16 friends come over to New York or the
17 island and they -- they get to see who
18 all the girls are around Jeffrey, and
19 they get to pick one which they want
20 to be with.

21 Q. So you were with Jeffrey and
22 a number of other females in New York
23 when a person, a friend would come in,
24 Alan Dershowitz would come in and look
25 at all of the girls and choose one?

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2 MS. MCCAWLEY: Objection.

3 MR. GUIRGUIS: Objection,
4 mischaracterizes testimony.

5 MS. MENNINGER: I'm asking a
6 question.

7 MR. GUIRGUIS: I'm objecting
8 to your question.

9 A. So let me give you a
10 specific example of that. So, for
11 example, there was an occasion where I
12 and some of the other girls were on
13 the island. So a specific occasion
14 was when [REDACTED] -- I don't know his
15 surname, but he owns [REDACTED] or
16 whatever, and he came with his
17 fiancée.

18 So, you know, you got a
19 table with Jeffrey Epstein of lots of
20 women -- girls, women, whatever --
21 beautiful girls, and you've got
22 friends joining him. And friends
23 popped over all the time.

24 So I had other -- there were
25 other males that visited Jeffrey on

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2 the island. I don't know who they
3 are. I can't remember their names.

4 But, yeah. I mean, he
5 didn't -- he didn't line them up and
6 go, hey, boys, pick which vagina you
7 want. He didn't do it that blatantly.

8 But they had spent time with
9 the girls during a lunch on the
10 island -- yeah, I mean, they -- his
11 friends would spend time with us.

12 Q. Okay. In paragraph 4, where
13 you say, "At his townhouse, I was also
14 lent out by him to his friends and
15 associates to have sex."

16 What do you mean by that
17 sentence?

18 A. Well, I mean, it's quite
19 obvious with the incidents -- well,
20 the incident that happened with Alan.
21 So I would classify that as being lent
22 out. I didn't willingly go, hey,
23 Alan, let's have some fun, because no
24 one on the planet would say that to
25 Alan.

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2 Q. So you say "lent out by him
3 to his friends and associates."

4 Who are the friends and
5 associates that you were lent out to?

6 MR. GUIRGUIS: Objection,
7 asked and answered.

8 A. Alan Dershowitz and [REDACTED]
9 The girls that I mentioned. There
10 were other girls that I had sexual
11 intercourse with, but I can't remember
12 their names.

13 Q. Were there any other men?

14 A. No, there weren't any other
15 men.

16 Q. [REDACTED] [REDACTED]

17 A. No.

18 Q. [REDACTED] [REDACTED] [REDACTED]

19 A. No, no, I don't know that.

20 Q. [REDACTED] [REDACTED] Yes? No?

21 A. No. That I would be lent
22 out to have sex with?

23 Q. Yes.

24 A. No, no.

25 Q. Tom Pritzker?

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2 A. No.

3 Q. [REDACTED] [REDACTED]

4 A. No.

5 Q. Were you paid money after
6 you had sex with Alan Dershowitz?

7 A. No.

8 Q. Were you paid money after
9 you had sex with [REDACTED]

10 A. No.

11 Q. Were you paid money after
12 you had sex with [REDACTED]

13 A. No.

14 Q. Were you paid money after
15 you had sex with any of the other
16 girls --

17 A. No.

18 Q. -- of names you can't
19 remember?

20 A. I was only ever paid to --
21 when I had sex with Jeffrey himself.

22 Q. In the course of massage?

23 A. Yes.

24 Q. Did you ever have sex with
25 Jeffrey not in a massage context?

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2 A. Yeah, we -- yeah. He was
3 really intimate all the time. We
4 had -- multiple times. I can't tell
5 you how many times I've slept with
6 Jeffrey. I mean, we were on rotation.
7 Every single day, it was -- sometimes
8 twice a day I was called.

9 You know, Ghislaine, [REDACTED]
10 [REDACTED] -- you know, it was -- yeah. I
11 mean, how -- we were on rotation
12 pretty much the whole time I was here.

13 Q. And when you say you were on
14 rotation, you mean you were having sex
15 with Jeffrey multiple times per day?

16 A. No. As in when I was
17 finished, another girl was called by
18 Ghislaine. And when they had
19 finished, another girl was called.

20 Q. How do you know that another
21 girl was called by Ghislaine?

22 A. Because I was there, and I
23 saw it and heard it with all my
24 senses. I saw Ghislaine call another
25 girl, and she called me herself, to go

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2 give Jeffrey Epstein a sexual massage.

3 Q. What do you mean by call? I
4 guess I'm thinking like telephone.

5 That may be my --

6 A. No. As in going up to the
7 person and going, Jeffrey wants to see
8 you in his bedroom, which meant it's
9 your turn to be abused. That kind of
10 thing.

11 Q. And this is on the island?

12 A. This is on the island.

13 Q. You heard -- as soon as you
14 were done with Jeffrey, you heard
15 Ghislaine go up to another girl and
16 say, it's your turn with Jeffrey?

17 A. So every single day, I
18 mean -- so I don't know how quickly
19 Jeffrey's sperm bank fills up. I
20 mean, I know guys can normally cum
21 once or twice a day, but Jeffrey's not
22 a normal person.

23 So, I mean, our rotation
24 changed every day that specific trip
25 we had in December.

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2 So, for example, I would be
3 called. Maybe a couple hours when
4 Jeffrey had a little, you know, break,
5 another girl was called, [REDACTED]
6 Then another girl was called. Every
7 single day.

8 We tried to hide on
9 different -- like, so we wouldn't have
10 to get called. We'd generally have to
11 sit in the main area. There was like
12 a big pool, the main seating area.
13 There was a big table. We'd sit there
14 and do kind of art on the table, and
15 we always had to be around. We
16 weren't allowed to go very far on the
17 island.

18 We always had to report to
19 Ghislaine and Jeffrey and tell them if
20 we were going down to the beach to
21 swim because they had an inflatable
22 trampoline. So they -- I mean, we
23 always had to tell Ghislaine and
24 Jeffrey where we were at all times.

25 Q. On the island?

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2 A. On the island, yeah.

3 Q. In New York -- strike that.

4 How many times a day, to
5 your knowledge, did Jeffrey Epstein
6 have sex?

7 A. To my knowledge, from what I
8 saw and what I've witnessed -- I don't
9 know what he did when I wasn't
10 there -- up to about three, four times
11 a day.

12 Q. So you had sex with him
13 three or four times a day?

14 MS. MCCAWLEY: Objection.

15 A. No.

16 Q. I'm sorry. You said to your
17 knowledge, what you witnessed. I'm
18 trying to understand what you mean.

19 A. So as soon as I slept with
20 Jeffrey, a certain time would go by.
21 He maybe had a coffee. And then there
22 was a specific occasion where then
23 [REDACTED] was called to go and do that
24 for Jeffrey.

25 Q. And you were not in the room

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2 when [REDACTED] was with Jeffrey?

3 A. No, but I was certainly
4 there afterwards, because she was
5 forced to have sex with [REDACTED] and
6 Jeffrey Epstein.

7 Q. That happened?

8 A. Yes. And she had never had
9 a female experience before and she was
10 very upset, very upset.

11 Q. So you didn't personally see
12 it, but you talked to [REDACTED] and saw
13 her afterwards?

14 A. Well, I don't think the
15 girls, when they were called, were
16 making cups of tea with Jeffrey in his
17 room. So -- and when a girl comes out
18 crying and I know that I've been
19 sexually abused, it's quite safe to
20 assume.

21 And when that girl tells you
22 she's being forced to have sex with
23 Jeffrey Epstein and [REDACTED] you know,
24 it's there, isn't it.

25 Q. So she told you?

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2 A. Yes, she told me. And with
3 my own intelligence, in my -- you
4 know, I can see with my own senses. I
5 can hear things, see things. It's
6 quite obvious what was going on.

7 MS. MENNINGER: I need a
8 small break.

9 (Time noted: 4:17 p.m.)

10 (Recess.)

11 (Time noted: 4:28 p.m.)

12 Q. On Defendant's Exhibit 3 in
13 the last paragraph, you describe
14 having had sex with Alan Dershowitz,
15 correct?

16 A. Correct.

17 Q. You say in the last sentence
18 that you recall "specific key details
19 of his person."

20 What specific key details of
21 his person do you recall?

22 A. You know, I recall his
23 appearance. You know, I'd met him,
24 you know, twice beforehand. So in
25 terms of specific key details, I can

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2 describe how he looked.

3 Q. How did he look?

4 A. He was, as I've explained --
5 described earlier, quite -- quite an
6 elderly man, wore glasses, quite
7 pasty, pasty-skinned. Not well, I
8 assumed, not at all well. He wasn't
9 well, W-E-L-L. Like, he wasn't a --
10 he wasn't -- he wasn't a healthy
11 person.

12 Q. And do you recall whether he
13 had a mustache?

14 A. I can't -- I can't recall if
15 he had a mustache, no.

16 Q. Which of those that you just
17 described are the key details you are
18 referring to in paragraph 4?

19 MS. MCCAWLEY: Objection,
20 asked and answered.

21 A. As I've described. I
22 mean...

23 Q. Pasty skin?

24 A. Pasty skin, wrinkly. I
25 didn't -- I tried to pay as little

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2 attention to him as possible. During
3 that session, I was completely
4 overwhelmed. I -- it completely took
5 me by surprise, that incident, and I
6 was exceptionally upset by what was
7 going on because I felt that I had
8 been coerced beforehand, that it had
9 been prior arranged to me arriving
10 there.

11 Q. Can you describe any other
12 specific key detail of his person that
13 you haven't already mentioned?

14 A. I can't remember specific
15 ones. It was -- I just tried to just
16 get it done as soon as possible to get
17 out of there. I couldn't wait to get
18 out of there quick enough, to be
19 honest.

20 Q. Did you tell your attorneys,
21 I recall specific key details of this
22 person?

23 A. I think I've just described
24 that key details of this person.

25 Q. Did you say those words to

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2 your attorneys when you drafted this?

3 MR. GUIRGUIS: Objection,

4 asked and answered.

5 MS. MCCAWLEY: Objection.

6 A. I do recall specific

7 details, which I've given.

8 Q. And they're the ones you've

9 already given?

10 A. I don't -- as I specified,
11 this was a coerced event that took
12 place. I was extremely upset. I did
13 not want to have sexual intercourse
14 with Alan.

15 I did not -- I don't -- I
16 don't remember specific -- I don't
17 remember specific things. I remember
18 ██████ -- me paying particular
19 attention to ██████ because I didn't
20 want Alan touching me, so it was -- as
21 I said, it was a traumatic experience.

22 I don't remember the finer
23 details of Alan Dershowitz's private
24 parts or any other thing. I tried to
25 spend as little time as possible

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2 touching Alan, as I'm sure you can
3 imagine.

4 Q. How was it coerced?

5 A. It was coerced in the sense
6 that when I arrived there, Alan
7 Dershowitz was there and [REDACTED] was
8 there. It was quite clear to me what
9 their intention was after me arriving
10 there.

11 Q. There being where?

12 A. Jeffrey's New York
13 apartment.

14 Q. When you arrived at
15 Jeffrey's New York apartment, Alan was
16 already there?

17 A. Yes.

18 Q. And [REDACTED] was already there?

19 A. Yes.

20 Q. What were the specific key
21 details of the sex acts that you can
22 remember that you have not already
23 described?

24 A. There was cunnilingus
25 involved, masturbation.

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2 Q. Who performed cunnilingus on
3 who?

4 A. We all performed cunnilingus
5 on each other.

6 Q. So did anyone perform
7 cunnilingus on Mr. Dershowitz?

8 A. Is that the same as girls
9 and boys? Yeah, same definition.

10 Q. Did you perform cunnilingus
11 on [REDACTED]

12 A. Yes.

13 Q. Did she perform it on you?

14 A. Yes.

15 Q. Did Mr. Dershowitz perform
16 it on you?

17 A. Yes.

18 Q. Did he perform it on [REDACTED]

19 A. Yes.

20 Q. And any other specific key
21 details of the sex acts you can
22 describe?

23 A. There was a lot of touching,
24 fondling, yeah.

25 Q. When you say Professor

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2 Dershowitz's name, you say Dershovitz
3 with a V, phonetically, correct?

4 A. I'm slightly dyslexic and
5 I'm terrible with names. So it's
6 known that I've always struggled with
7 pronunciations, especially because of
8 my accent as well.

9 Q. Do you believe you were
10 introduced to him as Dershovitz with a
11 V?

12 A. I was introduced to him as
13 Alan.

14 Q. Did you ever hear anyone say
15 his last name?

16 A. Yes.

17 Q. Did you hear those people
18 say it with a V?

19 A. I can't recall the exact
20 pronunciation of the tongue, but the
21 way my ears hear words -- perhaps you
22 can contact my university. I don't --
23 I have difficulty with names and I'm
24 slightly dyslexic, so...

25 MS. MENNINGER: Okay. Can

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2 you mark this as Defendant's
3 Exhibit 5.

4 (Defendant's Exhibit 5, jury
5 trial demand, was marked for
6 identification.)

7 MS. MCCAWLEY: Because I
8 forget earlier, just for the
9 record, the plaintiff in the case
10 is going to mark the deposition
11 as confidential.

12 MS. MENNINGER: Yes. I
13 discussed it with the court
14 reporter, and I think he already
15 has, but if not, he will do it.

16 MS. MCCAWLEY: Okay.

17 Q. Can you take a look at
18 Defendant's Exhibit 5.

19 A. Yes.

20 Q. Have you seen this document
21 before?

22 A. Yes.

23 Q. Did you review it before it
24 was filed?

25 A. Yes.

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2 Q. What do you understand this
3 document to be?

4 A. This is a complaint against
5 Jeffrey Epstein.

6 Q. Anyone else?

7 A. Ghislaine Maxwell, [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED]

10 Q. And this is a complaint that
11 you authorized be filed on your
12 behalf?

13 A. That's correct.

14 Q. And at the end of this
15 complaint, you ask for money to be
16 awarded to you, correct?

17 A. Can you refer me to the
18 specific page, please?

19 Q. Well, do you understand that
20 you are asking for money to be awarded
21 to you?

22 A. Can you tell me which page
23 that's on, please.

24 Q. I'm just asking your
25 understanding.

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2 A. Nothing's been promised to
3 me about money.

4 Q. Were you seeking money when
5 you authorized this complaint to be
6 filed on your behalf?

7 A. No. I just wanted a
8 pedophile behind bars, really, and for
9 him to stop abusing young girls.

10 Seeing as I'm going to be a
11 parent myself, I can't really live
12 with myself, knowing that there's a
13 pedophile with my kids on the planet.
14 So as a responsible human being, I
15 thought that I would come forward.

16 Q. So your hope in filing this
17 lawsuit was not to recover any money?

18 A. No. I want Jeffery and
19 Ghislaine and all of these people
20 behind bars so I can then visit them
21 in jail.

22 Q. In paragraph 36 of this,
23 which is on page 11, can I have you
24 review that paragraph.

25 A. Yep.

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2 Q. Do you know what that
3 paragraph refers to?

4 A. Yes, I do.

5 Q. What is the basis for your
6 statement that "Defendant [REDACTED]
7 reported to Defendants [REDACTED] [REDACTED]
8 and Maxwell, and was paid for her
9 recruitment of young females,
10 including the recruitment of
11 plaintiff"?

12 A. She told me face to face, in
13 person, that she was paid by Jeffrey.

14 And Jeffrey also offered to
15 pay me \$5,000 to find him a new
16 18-year-old model PA to help him with
17 his multi-billionaire corporation,
18 because she's that qualified.

19 Q. So when you say recruitment
20 of young females, you're referring to
21 people who are 18?

22 A. Yes.

23 Q. And at the time you were in
24 touch with Ms. [REDACTED] you were 22,
25 correct?

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2 A. That's correct.

3 Q. Apart from what Ms. [REDACTED]
4 told you, do you have any other basis
5 for knowing that [REDACTED] reported to
6 [REDACTED] [REDACTED] and Maxwell and was paid
7 for her recruitment of young females,
8 including you?

9 A. What she told me.

10 Q. Apart from what she told
11 you, do you have any other basis for
12 that?

13 A. Well, I saw it with my own
14 eyes. I was a witness.

15 Q. What did you witness?

16 A. I witnessed the same thing
17 all the other girls did, the same
18 thing I had to do, was go and report
19 to [REDACTED] [REDACTED] [REDACTED] [REDACTED] and
20 Ghislaine.

21 Ghislaine was the main lady.
22 [REDACTED] [REDACTED] and [REDACTED] [REDACTED] did all
23 the admin, like booking flights, like
24 what a normal PA does.

25 Do you understand?

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2 Q. Well, did you get paid for
3 recruitment of young females?

4 A. Jeffrey Epstein told me that
5 he would give me money to find him a
6 PA for him in South Africa.

7 Q. You did not find a PA,
8 correct?

9 A. Absolutely not.

10 Q. And you did not get paid for
11 recruitment of young females, correct?

12 A. Absolutely not.

13 Q. You say in paragraph 37 that
14 you were introduced to Epstein by
15 [REDACTED] correct?

16 A. Correct.

17 Q. And Epstein confirmed to you
18 that he would use his wealth and
19 influence to have you admitted into
20 FIT, correct?

21 A. That's correct.

22 Q. What did Epstein say to you
23 to confirm that? He said, I will use
24 my wealth and influence to have you
25 admitted, or some other words?

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2 A. I can't remember the exact
3 conversation, but from the very
4 beginning Jeffrey and Ghislaine knew
5 what my intentions were and why I
6 wanted to stay in New York, which was
7 to get a degree.

8 Q. Did Epstein say something to
9 you about a similar institute of
10 higher learning offering a curriculum
11 of fashion industry training?

12 A. No. I was pretty adamant
13 that I wanted to go to FIT. It's one
14 of the best fashion schools, so...

15 Q. In paragraph 38, you say
16 Maxwell told you that you would "need
17 to provide Epstein with body massages
18 in order to reap the benefits of his
19 and her connections."

20 What did Ms. Maxwell say to
21 you in regards to giving body massages
22 in order to reap benefits of her
23 connections?

24 A. Well, the fact that she told
25 me I had to weigh 52 kilograms in

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2 order for them to pay for my
3 education, that was pretty -- that was
4 one of the conversations that she had
5 with me.

6 Q. Does that have something to
7 do with body massages?

8 A. Can you repeat -- let me
9 read the question again.

10 So I would just like to
11 clarify, body massages meant sex,
12 okay? That's like a key word for sex.
13 So as soon as you stop having sex with
14 Jeffrey and his friends and his girls,
15 you're out, because otherwise there's
16 no reason for you to be associated
17 with Jeffrey, because you're just
18 there to have sex with him, so...

19 Q. Can I direct your attention
20 to the first sentence in paragraph 38,
21 and can you just explain to me when
22 that conversation took place.

23 MR. GUIRGUIS: Objection,
24 form.

25 A. First time I met Ghislaine,

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2 from the very first beginning.

3 Q. What did Ghislaine say to
4 you?

5 A. I can't remember the
6 specific conversation. But the fact
7 that she helped me refine my massage
8 skills to satisfy Jeffrey, I think
9 it's pretty self-explanatory.

10 Q. The one you described
11 earlier?

12 A. The one I described earlier.

13 Q. Okay. In the second
14 sentence, where it says, "Maxwell and
15 Epstein also threatened plaintiff that
16 while they had the ability to advance
17 her education and career, they also
18 had the ability to make sure that she
19 would obtain no formal education or
20 modeling agency contracts if she
21 failed to provide the sexual favors
22 desired by defendant Epstein or abide
23 by the instructions given her by
24 defendants Epstein and Maxwell."

25 A. Mm-hmm.

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2 Q. What did Ms. Maxwell say to
3 you that gave rise to this particular
4 statement?

5 A. Well, the fact that she used
6 to personally call me herself to give
7 Jeffrey sexual massages. Not body
8 massages; sexual massages. It should
9 be rephrased.

10 I mean, it was pretty
11 obvious. I mean, the whole weight
12 thing. I tried to swim off the
13 island. I tried to escape from an
14 island during the evening to try and
15 escape from her because if I didn't
16 lose weight, they would cut me out of
17 their -- financially off. I would
18 lose the place that I was staying at.
19 I would lose my education. You name
20 it.

21 They bullied me with
22 everything, just like they did with
23 the other girls.

24 Q. In paragraph 38, you say,
25 "Maxwell and Epstein also threatened

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2 plaintiff."

3 What was the threat that was
4 made to you by Maxwell?

5 MS. MCCAWLEY: Objection,
6 asked and answered.

7 A. The fact that I would lose
8 everything that they promised me.
9 They -- they were really naughty. You
10 know, they took girls from very
11 underprivileged families. They gave
12 them accommodation, they gave them
13 food, gave them money for
14 transportation, you know, private
15 planes, etcetera, etcetera.

16 So if I didn't have sex with
17 Jeffrey, I would be homeless and
18 starving in New York, so -- and my
19 dream of getting a full-time education
20 at one of the top fashion institutes
21 in the world would be diminished.

22 And that's what he held over
23 my head, exactly like he did with
24 [REDACTED] and the other girls. He was
25 paying for all of their educations.

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2 Q. How do you know that?

3 A. Because they were telling
4 me. It was common knowledge amongst
5 all the girls. No other girl would be
6 there willingly just to have sex with
7 Jeffrey.

8 Q. In paragraph 40, you say,
9 "Maxwell instructed plaintiff how to
10 massage Epstein using the techniques
11 that he preferred."

12 A. Correct.

13 Q. Is that the accident you
14 described earlier on the island?

15 A. There were many times that
16 she gave me massage techniques to help
17 refine my techniques. Jeffrey Epstein
18 was all about massages and the
19 techniques. He liked as many girls
20 touching him as possible all the time.

21 So there was more than one
22 occasion that Ghislaine showed me how
23 to massage him. It could have been on
24 that specific trip or the other one.

25 I'm not quite sure day,

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2 time, what seat I was sitting in, what
3 color the seat it is, but she on more
4 than one occasion showed me how to
5 massage Jeffrey and how to get out the
6 extreme knots in his body. Because
7 everyone knows about his knots and how
8 he likes them to pop and, yeah, the
9 specific techniques that he likes.

10 Q. The next sentence reads,
11 "During plaintiff's first massage,
12 defendant Epstein converted it into a
13 sexual act..." and it goes on.

14 Your first massage that
15 defendant Epstein converted into a
16 sexual act was prior to you meeting
17 Ms. Maxwell, correct?

18 A. Yes.

19 MS. MENNINGER: I'm going to
20 show you Defendant's Exhibit 6,
21 which are some photographs.

22 (Defendant's Exhibit 6,
23 ████████ stamped ██████████, was
24 marked for identification.)

25 Q. Do you recognize the

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2 photographs contained in Defendant's
3 Exhibit 6?

4 A. Yes, I do.

5 Q. What are they?

6 A. They are photos of Jeffrey's
7 island and the trip in December.

8 Q. Who took those photos?

9 A. [REDACTED] [REDACTED] took these specific
10 photos.

11 Q. And when you were asked to
12 provide these to us, where did you
13 locate them?

14 A. I had a disk that [REDACTED] [REDACTED]
15 had given me as a present and memento
16 of that holiday.

17 Q. Where is that disk now?

18 A. In Spain.

19 Q. Do you see in the corner
20 there are some little numbers with
21 your last name and then some --

22 A. [REDACTED], yeah, okay.

23 Q. I'm only showing you that so
24 we can together go through to some.

25 A. Okay.

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2 Q. So if I could ask you to
3 turn to -- well, the first ones
4 show --

5 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] is kitesurfing.

7 Q. Got it.

8 A. Yeah, that's [REDACTED]

9 Q. How do you know that that's
10 [REDACTED]

11 A. Because he came for lunch
12 that day and [REDACTED] -- [REDACTED] hi, I'm
13 [REDACTED]

14 Hi, [REDACTED]

15 Q. Did you have any sexual
16 relations with [REDACTED]

17 A. No.

18 Q. If you could turn to the one
19 that says [REDACTED] 22 in the corner.
20 It's about five or six pages back.

21 A. Yes.

22 Q. Who is that in the
23 photograph?

24 A. [REDACTED] [REDACTED]

25 Q. And who is the other person?

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2 A. That's me.

3 Q. And when was this photograph
4 taken?

5 A. This was taken during the
6 December trip.

7 Q. Was there only one trip in
8 December?

9 A. From what I recall, yeah.

10 Q. Was that the first trip that
11 you had taken?

12 A. No.

13 Q. When was the first trip you
14 had taken?

15 A. I answered that previously,
16 which was not so long after I met
17 Jeffrey Epstein for the first time.
18 So I had been there various times
19 before these were taken.

20 Q. Do you know how many?

21 A. Like I said earlier,
22 several. I mean, I...

23 Q. And can you turn to [REDACTED]
24 24?

25 A. Mm-hmm.

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2 Q. Who is that?

3 A. That's the wonderful [REDACTED]

4 [REDACTED]

5 Q. Did you take these
6 photographs?

7 A. [REDACTED] [REDACTED] took these ones.

8 Q. All of them?

9 A. There were -- I had other
10 photos as well.

11 Q. That came later, a separate
12 batch?

13 A. Yeah, those are the hard
14 copies.

15 MS. MENNINGER: I will mark
16 it now, the second batch,
17 Defendant's Exhibit 7.

18 (Defendant's Exhibit 7,
19 [REDACTED] stamped [REDACTED]_000204, was
20 marked for identification.)

21 MS. MENNINGER: I apologize,
22 Counsel. We just got these last
23 night, so I only have one copy
24 for the witness.

25 MR. GUIRGUIS: That's fine.

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2 Q. So is Defendant's Exhibit 7
3 the second batch that you were
4 referring to?

5 A. Yes.

6 Q. Okay. So I'm just trying to
7 help be clear.

8 Defendant's Exhibit 6, you
9 believe were all given to you by [REDACTED]
10 [REDACTED] on a disk?

11 A. Well, there's a lot of
12 photos here. So I took some, I had
13 some hard copies, and they're all
14 actually all together, so...

15 Q. Okay, that's fine.

16 A. Yeah. I don't want to be
17 unclear on which exhibit is which.
18 There's hundreds here.

19 Q. So the photographs of [REDACTED]
20 [REDACTED] you're saying were taken by
21 [REDACTED] [REDACTED] that we were looking at in
22 [REDACTED] 24?

23 A. Well, I can recheck the disk
24 and then I can actually tell you
25 exactly which ones he took, but I

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2 can't recall every single photo on
3 [REDACTED] [REDACTED]'s disk. But there were
4 multiple photos that were produced
5 from myself as well.

6 Q. Okay. I will just ask you
7 about a few.

8 A. Okay.

9 Q. [REDACTED] 24 is one that you
10 said was -- of [REDACTED] [REDACTED] was one
11 you said you thought [REDACTED] [REDACTED] had
12 taken?

13 A. Yes.

14 Q. If you could turn to [REDACTED]
15 40. And these are in order, so
16 hopefully that will be easy.

17 A. Okay. Mm-hmm.

18 Q. Who is represented in this
19 photograph?

20 A. That's [REDACTED]

21 Q. And where is [REDACTED] in this
22 photograph, if you know?

23 A. This is by the beach.
24 There's like -- there's like a small
25 beach, like there's a beach house on

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2 the beachfront.

3 Q. Do you know who took this
4 photograph?

5 A. I can't remember.

6 Q. Okay. Turning a couple more
7 pages to [REDACTED] 42, who is that?

8 A. That's me.

9 Q. Are you smoking?

10 A. I am. And that was after
11 the argument that I had with Jeffrey
12 about me being on lithium and me not
13 being able to smoke. And that was the
14 reason I was really upset, that I
15 couldn't smoke and that I was being
16 put on a stupid diet.

17 So Jeffrey -- yeah, Jeffrey
18 said it was okay for me to smoke. I
19 wasn't allowed to smoke in front of
20 him. That was the rule.

21 Q. Do you know who took this
22 photograph?

23 A. I don't remember who took
24 that photograph.

25 Q. Is it on the same trip in

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2 December?

3 A. Yes.

4 Q. Turning the next page, is
5 that also you and [REDACTED] [REDACTED]

6 A. That's correct.

7 Q. Do you know who took this
8 photograph?

9 A. I can't remember.

10 Q. Was it also in the same time
11 frame when you were upset?

12 A. It was that same December
13 trip, yes.

14 MS. MENNINGER: We can go
15 off the record for just a minute.
16 I think we're swapping out
17 counsel.

18 (Ms. McCawley left the
19 hearing and Ms. Syed entered.)

20 (Time noted: 4:56 p.m.)

21 (Recess.)

22 (Time noted: 4:56 p.m.)

23 Q. Looking at [REDACTED] 44,
24 you're saying it's in the same time
25 period?

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2 A. Yeah.

3 Q. And also true of 45?

4 A. Yes.

5 Q. And 47?

6 A. Yes. It was the same
7 holiday, the same trip.

8 Q. And do you know who took
9 these photographs?

10 A. I don't remember.

11 Q. Is that also true for 48,
12 49, 50, 51, 52?

13 A. I don't remember who took
14 those photos.

15 Q. Okay. Can you tell from 52
16 where you were situated on the island?

17 A. It was on the beach.

18 Q. 53, can you tell me who that
19 is?

20 A. That's [REDACTED]

21 Q. 54 and 55, also [REDACTED]

22 A. That's correct.

23 Q. 69, who is that?

24 A. That's Jeffrey Epstein.

25 Q. Do you know who took this

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2 photograph?

3 A. I can't remember who took
4 this photograph.

5 Q. 71, is that you?

6 A. That's correct.

7 Q. Were you posing for the
8 photograph?

9 A. Most people pose for
10 photographs, every photograph. So I
11 presume I was posing.

12 Q. Do you know what [REDACTED] [REDACTED]'s
13 line of work is?

14 A. I think he's with modeling
15 or something, like a modeling agent.

16 Q. Do you know where he's
17 based?

18 A. I have no idea where he's
19 based.

20 Q. Did you meet him more than
21 once?

22 A. I can't remember if I met
23 him more than once.

24 Q. Did you have sexual contact
25 with him?

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2 A. No.

3 Q. Did you give him a massage?

4 A. No.

5 Q. Sorry. Going back a little

6 bit further to [REDACTED] 121.

7 A. Mm-hmm.

8 Q. Who is in that photograph?

9 A. That's [REDACTED] and [REDACTED]

10 Q. Okay. So [REDACTED]'s on the

11 left?

12 A. That's correct.

13 Q. And [REDACTED]'s on the right?

14 A. That's correct.

15 Q. Do you know what they're

16 doing?

17 A. I would love to know what

18 they're doing myself, personally.

19 Q. Did you take this

20 photograph?

21 A. I can't remember.

22 Q. Turning to 123, do you know

23 what is happening in that photograph?

24 A. I think we were just playing

25 around. I don't think it was serious,

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2 you know.

3 Q. Okay.

4 A. Just to make that clear.

5 Q. Can I have you look at 126.

6 A. Yeah.

7 Q. Who is in that photograph?

8 A. That's [REDACTED] and [REDACTED]

9 Q. And [REDACTED] is in the
10 background?

11 A. That's correct.

12 Q. On 127 --

13 A. Mm-hmm.

14 Q. -- who is in that
15 photograph?

16 A. To the right -- sorry, to
17 the left it's myself, [REDACTED] [REDACTED]
18 and then [REDACTED]

19 Q. Is this on the same December
20 trip?

21 A. That's correct.

22 Q. When did [REDACTED] [REDACTED] give you
23 the disk?

24 A. I can't remember when he
25 gave me the disk.

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2 Q. Do you know if these
3 photographs are ones that he took?

4 A. They were photos that were
5 taken during our holiday together, and
6 they were given to me as a memento, as
7 a present from [REDACTED] [REDACTED]

8 Q. In person?

9 A. I can't remember.

10 Q. Do you recall the tortoise?

11 A. I can't remember the
12 tortoise.

13 Q. Apart from [REDACTED] [REDACTED]
14 [REDACTED] and yourself and [REDACTED] [REDACTED], do
15 you remember anyone else being on this
16 particular trip?

17 A. There were -- there were
18 quite a few people that visited the
19 island. I don't remember their names.

20 Q. Can I have you look at 138.

21 A. Mm-hmm, yeah.

22 Q. Do you know who took that
23 photograph?

24 A. I don't know who took that
25 photograph.

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2 Q. Do you know when it was
3 taken?

4 A. It was taken that December
5 trip that I took with Ghislaine and
6 Jeffrey.

7 Q. How do you know that?

8 A. Because I remember what she
9 was wearing. And I was there. I was
10 there in person. Like, I was there.

11 Q. So you saw her on the island
12 wearing those clothes?

13 A. I saw her on the island
14 wearing those clothes.

15 Q. Did you see her sitting in
16 this position while on the island?

17 A. I saw her with my own eyes
18 sitting in this position. I was
19 probably sitting next to her.

20 Q. But you don't know if you
21 took the photograph or someone else?

22 A. You know what? Photos are
23 photos. I don't remember if I took
24 the photo or if someone else took the
25 photo.

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2 All I remember is I was with
3 Ghislaine on this trip. I was
4 probably sitting next to her in this
5 photo. I don't know who -- which
6 specific girl took the photo.

7 Q. Do you know if it was a girl
8 who took the photo?

9 A. I have no idea who took the
10 photo. I just remember sitting there
11 and remember being next to Ghislaine
12 while she was wearing that outfit. I
13 was there during that time frame.

14 Q. ██████████ 139, who is that, if
15 you know?

16 A. That is ██████████ ██████████ after
17 she had a shower, and she's in
18 Victoria's Secret pajamas that were
19 supplied to us.

20 Q. They were supplied to you?

21 A. Yes. All of the outfits --
22 there were clothes that were provided
23 on the island by Jeffrey Epstein,
24 which were all Victoria's Secret
25 clothing: bikinis, nightwear.

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2 Q. You're talking about the
3 flannel pajamas?

4 A. Yes.

5 Q. Page 140, do you know who
6 took this photograph?

7 A. I don't remember taking this
8 photo, but I remember that very well
9 because we are doing mosaic on that
10 table. We were busy doing a fish. So
11 that's what all these are apparatus
12 are. We were doing mosaics.

13 So I don't remember if I
14 took that photo, but I remember I was
15 there, because we were all doing
16 mosaics.

17 Q. 142?

18 A. Mm-hmm.

19 Q. Do you remember who took
20 that photograph?

21 A. I can't remember -- ■, the
22 BlackBerry. I can't remember who took
23 all the photos when I was there. You
24 can see the mosaics that we were doing
25 together.

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2 Q. Do you still have that
3 mosaic?

4 A. No. It was on the big table
5 that she's sitting at, the large
6 table. So we actually stuck the
7 mosaic on the table.

8 Q. 143, do you know who took
9 that?

10 A. No. We were all there
11 together.

12 Q. Going through the rest, do
13 you see any that you know who took the
14 photo?

15 A. No.

16 MR. GUIRGUIS: Take your
17 time and look at each onem.
18 Don't just -- take your time.

19 Can we take a break for just
20 a minute.

21 (Time noted: 5:06 p.m.)

22 (Recess.)

23 (Time noted: 5:15 p.m.)

24 Q. Did you have a chance to
25 look through the rest of the

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2 photographs in Defendant's Exhibit 6?

3 A. No, because I took a break,
4 so I will continue now.

5 Q. Sure.

6 A. I can't remember who took
7 these photos. It was during all the
8 same trip.

9 Q. It was what?

10 A. It was during that same
11 trip.

12 Q. Can I have you take a look
13 at [REDACTED] 154. It's one of the last
14 few of that exhibit.

15 A. Yes.

16 Q. Do you know where that
17 photograph was taken?

18 A. I can't remember.

19 Q. Do you know if you were
20 there?

21 A. I can't remember.

22 Q. Does it appear to be inside
23 of a shop?

24 A. It appears that way.

25 Q. Do you recall going to any

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2 shops on that trip?

3 A. I went everywhere with
4 Jeffrey, so...

5 Q. Did that include shops?

6 A. Yes.

7 Q. Do you recall this shop?

8 A. There were many shops that I
9 visited. I can't recall this specific
10 shop.

11 Q. Do you know who the
12 gentleman is?

13 A. I can't remember his name.

14 Q. And by gentleman, I mean the
15 person on the left.

16 A. Thank you for clarifying
17 that.

18 No, I don't recall. I don't
19 know who this Jeffrey -- Jeffrey's on
20 the right. I don't know the name, I
21 can't remember the name of this guy.

22 Q. Wearing a belt?

23 A. Trying on a belt, yeah.

24 Q. Okay. Turning to
25 Defendant's Exhibit 7.

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2 A. Yes.

3 Q. Do you recognize these
4 photographs?

5 A. I remember this photograph,
6 the first one, very well.

7 Q. What is it?

8 A. It's a box -- it's a box of
9 condoms that were placed around the
10 island for the guests to use at their
11 leisure.

12 Q. Where on the island was this
13 one?

14 A. I can't remember.

15 Q. Did you take the photograph?

16 A. I can't remember.

17 Q. Do you have this photograph
18 at your house now?

19 A. I'll have to recheck. I
20 can't remember where this photo came
21 from, if it was either on the disk or
22 by myself. But it was -- I recognize
23 the box. There were boxes like this
24 put everywhere.

25 Q. Did you have any photographs

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2 contained on your computer?

3 A. No.

4 Q. Where were photographs that
5 you gathered together to produce?

6 A. You've got them all there.
7 I just need to -- all the photos that
8 I have, you guys have. So I don't
9 know.

10 Q. Where were they? Where did
11 you find them?

12 A. My photos?

13 Q. Yes.

14 A. In my storage.

15 Q. Where is that?

16 A. It was in England. It was
17 in my private box where I keep all my
18 photos from, you know, when I was a
19 baby to now, so...

20 Q. Is that with your mother?

21 A. No, that wasn't with my
22 mother.

23 Q. Where is the storage in
24 London?

25 A. The storage was in Ramsgate.

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2 Q. And where did it go?

3 A. It's now in my current
4 residency in Spain.

5 Q. When you gathered the photos
6 together and gave them to your lawyer
7 to give to us, did you gather them in
8 Spain or in London?

9 A. My stuff was in London and I
10 moved to Barcelona. I was currently
11 staying in Barcelona with [REDACTED] and
12 we were just going to commute between
13 St. Albans and Barcelona.

14 When I came forward, I knew
15 that I had photos that I had taken and
16 I knew that I had materials.

17 At that same time is --
18 during that same time, I contacted
19 Maureen Callahan. When I contacted
20 Maureen Callahan, there were people
21 that were following me in Barcelona,
22 and I got scared.

23 I then contacted my estate
24 agent. I got my entire flat packed up
25 in St. Albans and moved to Spain. I

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2 was too frightened to actually fly
3 back myself and pack, so I stayed in
4 Barcelona and a company packed my
5 things for me and brought them to me.

6 Q. Okay. So they were in St.
7 Albans. You had them all packed up
8 and sent to you in Barcelona, where
9 you relocated?

10 A. That's correct.

11 Q. When you were interacting
12 with Ms. Callahan, did you send her
13 any photographs?

14 A. Sorry, sorry. Who is
15 Ms. Callahan? Sorry. I'm just really
16 tired. I'm really bad with names.
17 Callahan first name, please.

18 Q. Do you know who Ms. Callahan
19 is?

20 A. It's really late, I've had a
21 really long day, and I've said
22 numerous times throughout the day that
23 I am slightly dyslexic and I have
24 difficulty with names.

25 Can you just tell me

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2 Ms. Callahan's first name so I can
3 answer the question, please.

4 Q. Is Ms. Callahan the name of
5 the individual that you said worked
6 for the New York Post?

7 A. [REDACTED], sorry. Maureen
8 Callahan, yes.

9 Q. Did you send Ms. Callahan
10 any photographs?

11 A. Not of this, no. Not of
12 this.

13 Q. Did you send her photographs
14 of something else?

15 A. I did. I sent her a photo
16 of [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18 A. [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED] [REDACTED]

4 Q. Why did you send

5 Ms. Callahan a photograph of [REDACTED]

6 [REDACTED] [REDACTED] [REDACTED]

7 A. Because I wanted to show her

8 I was telling the truth about

9 everything. I didn't want to send a

10 journalist anything regarding Jeffrey

11 Epstein because I -- I -- well, I sent

12 her a picture of [REDACTED] [REDACTED] [REDACTED]

13 to show that I was telling my story,

14 that my story was straight from the

15 beginning, [REDACTED] [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED], etcetera. So...

17 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED] [REDACTED]

4 Q. Apart from the photograph

5 [REDACTED] [REDACTED] [REDACTED] [REDACTED], did you send

6 Ms. Callahan any other documents or

7 photographs?

8 A. I can't remember.

9 Q. Did you have contact with
10 any other media person?

11 A. I can't remember.

12 Q. Did you meet with anyone
13 from the Daily Mail?

14 A. No.

15 Q. From the Mirror?

16 A. No.

17 Q. Did you speak to anyone from
18 the Daily Mail?

19 A. No.

20 Q. Anyone from the Mirror?

21 A. No.

22 Q. The Independent?

23 A. No.

24 Q. The Guardian?

25 A. No.

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2 Q. When you got these boxes of
3 items from St. Albans and you looked
4 at them while you were in Barcelona;
5 is that right?

6 A. I --

7 MR. GUIRGUIS: Objection.

8 A. I looked at them -- I
9 vaguely went through the photos in St.
10 Albans. I knew what was there. Yeah,
11 I -- they were there, so I saw them.
12 I went through my photos, like all my
13 memorabilia that had been in storage.
14 But that's about it.

15 Q. And you selected photographs
16 to send to your lawyers to give to us,
17 correct?

18 A. I was asked to -- well I
19 just provided every -- all the
20 evidence that I had.

21 Q. When did do you that?

22 MR. GUIRGUIS: I'm going to
23 object. If you're talking about
24 a communication between client
25 and counsel -- is that what

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2 you're asking for?

3 MS. MENNINGER: No. I'm
4 asking when did you provide all
5 of your evidence, which is what
6 she said that she had.

7 MR. GUIRGUIS: The photos --
8 you mean when she provided them
9 to her counsel?

10 MS. MENNINGER: Yes.

11 Q. When did you provide them to
12 your counsel?

13 MR. GUIRGUIS: Objection.
14 Do not answer.

15 Q. Did you receive a subpoena
16 in this case?

17 A. I don't know what a subpoena
18 is.

19 MS. MENNINGER: Let's mark
20 Defendant's Exhibit 8.

21 (Defendant's Exhibit 8,
22 Notice of Service of Rule 45
23 Subpoena and Notice of Deposition
24 of [REDACTED], was marked for
25 identification.)

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2 Q. Have you seen this document
3 before?

4 A. Let me just have a look,
5 okay. I don't remember.

6 Q. Have you ever seen this
7 document before?

8 MR. GUIRGUIS: Objection,
9 asked and answered.

10 MS. MENNINGER: I'm sorry.
11 I didn't hear an answer.

12 A. I've seen various papers. I
13 remember specifically seeing the
14 depositions. There's been millions of
15 documents. I can't remember which
16 specific documents I've seen.

17 Q. Okay. If I could have you
18 turn to the last three pages, where it
19 says "Documents to be Produced."

20 A. Mm-hmm.

21 Q. Have you seen that list
22 before?

23 A. Yes, I have.

24 Q. Did you conduct a search of
25 your records to produce documents?

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2 A. Yes, I believe that I
3 produced every single document I can.

4 Q. After looking at this list,
5 did you go back and look through your
6 photographs in Barcelona?

7 A. As I said, I looked at
8 everything I had during that time
9 frame and I produced everything I can
10 during that time frame that I was with
11 Jeffrey.

12 Q. Just tell me what you did in
13 order to make sure you had produced
14 everything that was called for in this
15 list.

16 A. Okay. So I went through a
17 box of about over 5,000 photos that I
18 had, and I went through every single
19 photo, every single disk, everything
20 that I had.

21 I went through all my
22 emails.

23 I tried to look for the
24 BlackBerry sim card, which I had hoped
25 that I had kept, which had all

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2 Ghislaine's messages on and Jeffrey's
3 and [REDACTED]'s, and stupidly I misplaced
4 that, which is really annoying.

5 But I myself, you know,
6 considering my objective is to get
7 these people and get justice for the
8 abuse that Ghislaine caused me -- and
9 Jeffrey -- I have given as sufficient
10 evidence that I have.

11 Q. Did you look for all
12 photographs taken by you or containing
13 any image of you at or near any home,
14 business, private vehicle or any other
15 property owned or controlled by
16 Jeffrey Epstein, as indicated in
17 paragraph 7?

18 A. Yes.

19 Q. Likewise in paragraph 8, did
20 you look for any photographs that
21 depict any home, business, private
22 vehicle or any other property owned or
23 controlled by Jeffrey Epstein?

24 A. Yes.

25 Q. And you did that after

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2 reviewing this list of documents?

3 A. Yeah, I mean, I received the
4 list and I've complied with
5 everything. I have given absolutely
6 everything that I can to you guys.

7 Q. Have you given all of your
8 passports, travel visas or permissions
9 to live, work or study in other
10 country?

11 A. I haven't given my current
12 passports, but I've given everything
13 that I have; documents, passports that
14 I had during, commercial plane
15 tickets.

16 Q. Do you have any visas?

17 A. I have a visa coming here,
18 but that's the only visa that I have.

19 Q. Do you have any visa
20 applications?

21 A. No.

22 Q. Do you have any other plane
23 tickets or boarding passes for the
24 period 2006 to 2007?

25 A. No.

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2 Q. Turning back to Defendant's
3 Exhibit 7, these photographs, do you
4 know what the second photograph
5 represents?

6 A. Yes, that's me playing with
7 Ghislaine's dog, a Yorkshire Terrier.

8 Q. Where are you in this
9 picture?

10 A. I was in the girls' bedroom
11 where we all slept, and I was on my
12 bed playing with Ghislaine's dog.

13 Q. When was this photograph
14 taken?

15 A. I can't remember.

16 Q. Was it the same trip as
17 Defendant's Exhibit 6?

18 A. I can't remember.

19 Q. Okay. Do you know who took
20 the photograph in 205?

21 A. I can't remember.

22 Q. 206?

23 MR. GUIRGUIS: Objection to
24 form.

25 A. I can't remember.

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2 Q. 207?

3 MR. GUIRGUIS: Objection to
4 form.

5 A. Can't remember.

6 Q. Who is depicted in 208?

7 A. [REDACTED]

8 Q. And?

9 A. [REDACTED], and me. That's me.

10 Q. And 209?

11 A. Sorry. That's me, [REDACTED]

12 [REDACTED] [REDACTED], and one of Jeffrey's staff
13 members in the background.

14 Q. Turning to 213, is that you?

15 A. Yes, that's me.

16 Q. And where are you located?

17 A. I'm trying to remember
18 specifically where that is on the
19 island. I think it's near the main
20 house, there was a -- yeah, there was
21 a fountain near the main house.

22 Q. Do you know whether you took
23 this?

24 A. I don't remember.

25 Q. Do you know whether you had

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2 this photograph on the disk?

3 A. I think these were one of my
4 photos.

5 Q. Was it in hard copy, like an
6 actual print?

7 A. I can't remember. I have to
8 double check if there are more copies.
9 But I think -- yeah, I'm pretty sure
10 this is a hard copy.

11 Q. Does it have a back, like
12 when it was developed or printed?

13 A. I can check.

14 Q. Is it back in Barcelona?

15 A. No.

16 Q. Where are these photographs?

17 A. I have given all the
18 photographs to my lawyers.

19 Q. Okay. How did you do that?
20 By handing them over in person?
21 Sending them by mail?

22 A. Handing them over in person.

23 Q. Was this some type of photo
24 shoot represented in [REDACTED] 214, 215,
25 216?

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2 A. Sorry. 214, this is not a
3 photo shoot. We were just messing
4 around on the island.

5 Q. Do you know who you were
6 messing around with?

7 A. We were all having fun
8 together.

9 Q. Were there photographs of
10 other people taken around the same
11 time that you have?

12 A. I have given all the photos
13 that I have.

14 Q. In other words, if you were
15 messing around with [REDACTED] at this
16 time and there's a photo of [REDACTED]
17 that you have, did you provide that?

18 A. I provided every single
19 photograph that I have.

20 Q. And 218, was that a photo
21 shoot?

22 A. That was me when I was
23 naked, actually, and I had a towel
24 around me. So I think I just had a
25 massage by Jeffrey, because I was

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2 naked underneath the towel.

3 Q. Also 219 and 220?

4 A. Yep.

5 Q. Those were just after a
6 massage?

7 A. Yeah. You can tell I look
8 really, really happy to be out of
9 there, so...

10 Q. Do you know which trip that
11 was on?

12 A. I can't remember which trip.

13 Q. And page [REDACTED] 221, who is
14 in that photograph?

15 A. Myself, [REDACTED] and [REDACTED] [REDACTED],
16 and a staff member in the background.

17 Q. Do you know what's happening
18 in 223?

19 A. [REDACTED], no. Yes. So Jeffrey
20 provided cosmetics for all the girls.
21 We had to look our best. So that was
22 a Crème de la Mer facial mask that he
23 regularly gave to the girls so their
24 skin was nice. We had top-line
25 cosmetics in our bathroom to use at

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2 our disposal.

3 Q. So in 223 and 224 you're
4 doing a facial mask?

5 A. I'm attempting to do a
6 facial. It's not going that well.

7 Q. And going to 229, do you
8 know where that was taken?

9 A. That was on Jeffrey's
10 speedboat to -- going to the island.

11 Q. Do you know when?

12 A. I don't recall which date
13 that was.

14 Q. Did you have any contact
15 with the mail on Sunday?

16 MR. GUIRGUIS: Objection.

17 Huh?

18 Q. Did you ever have any
19 contact with the mail on Sunday?

20 A. No.

21 MR. GUIRGUIS: You mean the
22 mail as in postage? I'm sorry.

23 MR. PAGLIUCA: The
24 newspaper.

25 A. No, no, I haven't had

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2 correspondence with them, no.

3 Q. Apart from Ms. Callahan,
4 have you had contact with any member
5 of the press?

6 A. [REDACTED], I contacted [REDACTED]
7 [REDACTED] because [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. Okay. Did you have any
10 contact with any other member of the
11 press?

12 A. No.

13 Q. When was the last time that
14 you saw Ghislaine Maxwell?

15 A. In New York, before I left
16 in 2007.

17 Q. How long before you left?

18 A. I can't remember.

19 Q. What time of year was it?

20 A. When I left?

21 Q. Yes.

22 A. It was the end of April.

23 Q. How do you know that?

24 A. Because I am -- on some of
25 the emails, I wanted to go home.

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2 Actually, back to my mom.

3 Q. When's the last time you
4 spoke to Ghislaine Maxwell?

5 A. Before I left New York.

6 Q. Okay. Do you know how long
7 before you left?

8 A. I can't remember.

9 Q. Tell me what you recall
10 about the last time you saw Ghislaine
11 Maxwell.

12 A. I can't remember.

13 Q. Where it was?

14 A. I can't remember my last
15 interaction with Ghislaine.

16 Q. Or the last time you spoke
17 with her?

18 MR. GUIRGUIS: Objection,
19 asked and answered.

20 A. I can't remember the last
21 time I spoke to her. Yeah, I don't
22 remember the specifics.

23 Q. Were you living with [REDACTED] at
24 the time you last spoke to Ghislaine?

25 A. Yes.

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2 Q. What did she say to you when
3 you last spoke to her --

4 MR. GUIRGUIS: Objection,
5 asked and answered.

6 Q. -- when you were living with

7 [REDACTED]

8 MR. GUIRGUIS: Objection,
9 asked and answered.

10 A. I can't remember.

11 Q. Did you speak to her about
12 FIT?

13 MR. GUIRGUIS: Objection,
14 asked and answered.

15 A. I had spoken to her numerous
16 times about FIT.

17 MS. MENNINGER: Counsel,
18 when did I already ask her, did
19 you speak to her about FIT.

20 MR. GUIRGUIS: You've asked
21 her --

22 THE WITNESS: Several times.

23 MS. MENNINGER: I'm not
24 talking to you.

25 MR. GUIRGUIS: Okay.

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2 THE WITNESS: That was rude.

3 MR. GUIRGUIS: It was, and
4 I'm not going to answer her
5 question now.

6 You can proceed, Counsel.

7 MS. MENNINGER: When did I
8 last ask her about --

9 MR. GUIRGUIS: I'm not going
10 to answer your question. I'm not
11 being deposed. I'm not arguing
12 objections with you. You have
13 asked her about it before; that's
14 why I made my objection.

15 You can proceed with your
16 questioning whenever you like,
17 Counsel.

18 MS. MENNINGER: Thank you.

19 MR. GUIRGUIS: Feel free to
20 search the transcript later.

21 MS. MENNINGER: I would like
22 to mark as Defendant's Exhibit 8.

23 (Defendant's Exhibit 8,
24 [REDACTED] stamped [REDACTED], was
25 marked for identification.)

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2 Q. Do you recognize Defendant's
3 Exhibit 8?

4 A. Yes, I do.

5 Q. What is it?

6 A. They're emails.

7 Q. Did you find these emails
8 and produce them?

9 A. That's correct.

10 Q. Where did you find them?

11 A. On my old email account that
12 I had during that time.

13 Q. What was your old email
14 account?

15 A. [REDACTED]

16 Q. When did you stop using that
17 email account?

18 A. A guess a year or a few
19 months after. I can't recall when I
20 stopped using it.

21 Q. Do you see on the first page
22 where it says [REDACTED] 004, there are
23 two emails in the chain which are
24 visible?

25 A. That's correct.

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2 Q. And did you produce the
3 other emails between those two that
4 are not visible?

5 A. Yes.

6 Q. When did you do that?

7 A. The same time I provided all
8 the emails originally.

9 Q. Okay. So you believed that
10 you produced six emails of
11 conversation between yourself and

12 [REDACTED] [REDACTED]

13 MR. GUIRGUIS: I'm going to
14 object and just ask for
15 clarification.

16 I'm not trying to give you a
17 hard time on this one. When you
18 say produced, you're asking the
19 witness if she provided it to her
20 attorneys, right? Because
21 obviously the attorneys produced
22 the documents in this case.

23 MS. MENNINGER: Correct.

24 MR. GUIRGUIS: So just --
25 she didn't produce anything,

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2 obviously.

3 So she's asking you did you
4 collect this email and give it to
5 the lawyers, I guess is the
6 question.

7 A. Yeah, I collected all --
8 all -- everything I had, I gave to my
9 lawyers.

10 Q. Okay. So you believe you
11 gave six emails between yourself and
12 [REDACTED] [REDACTED] to your attorneys?

13 A. Yes, I gave all my evidence.

14 Q. Okay. And --

15 MR. GUIRGUIS: I'm going to
16 object to that last question also
17 as misrepresenting the testimony.

18 MS. MENNINGER: What was
19 misrepresenting what testimony?

20 MR. GUIRGUIS: You're saying
21 that she gave six emails.

22 MS. MENNINGER: Well, let's
23 go back, then, and get the
24 testimony right.

25 Q. On [REDACTED] 004, how many

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2 emails between yourself and [REDACTED]

3 [REDACTED] do you see total?

4 There's one at 1:04 a.m.,
5 correct?

6 MR. GUIRGUIS: Counsel,
7 you're doing the exact thing that
8 I just tried to avoid confusion
9 on, right?

10 There's a difference between
11 what was produced to you -- and
12 apparently and you're saying that
13 six emails were produced to
14 you --

15 MS. MENNINGER: No, I was
16 not saying that.

17 MR. GUIRGUIS: -- which
18 she's providing to her counsel.

19 MS. MENNINGER: No, I'm not
20 saying that. So I'm trying to
21 get it straight now.

22 Q. There's an email indicated
23 on the first page from [REDACTED] to you
24 at 1:04 a.m. on February 3rd, 2007,
25 correct?

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2 A. Mm-hmm. Yes.

3 Q. And you can read the text of
4 that email, correct?

5 A. Yes, I can.

6 Q. And the next email down says
7 "██████████" at 4:07 -- at 4:01
8 p.m.

9 A. Mm-hmm.

10 Q. Can you read that email?

11 A. No, because it's on Yahoo.
12 It's a technological thing. You can't
13 read all emails.

14 Q. So did you produce the
15 February '04, '07, 4:01 p.m. email
16 from yourself to ██████████ ██████████ to
17 your attorneys?

18 MR. GUIRGUIS: Objection to
19 the use of the word produce.

20 A. I've given all my email
21 correspondence to my lawyers.

22 Q. Did you give that email to
23 your lawyer?

24 A. I've given all my emails to
25 my lawyers.

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2 Q. Okay. The next email down
3 says "[REDACTED], February 5, 2007,
4 at 10:09 p.m."

5 Can you read the text of
6 that email on this document?

7 A. Mm-hmm.

8 Q. What does the 10:09 p.m.
9 email say?

10 A. As I've specified before,
11 this is a screenshot, okay, of the
12 actual Yahoo email. This is a
13 screenshot. So technically I can't
14 read that anyways, seeing as it's a
15 screen shot.

16 Q. Okay.

17 A. This isn't a computer. I
18 can't tap into that email on a page
19 because it's a screen shot.

20 Q. Did you give a February 6th,
21 '07, 2:00 a.m. email between yourself
22 and [REDACTED] [REDACTED] to your attorneys?

23 A. I have handed all over my
24 evidence to my attorneys.

25 Q. Did you give a February 8,

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2 2007, 9:12 p.m. email from yourself to
3 [REDACTED] [REDACTED] to your attorneys?

4 A. I have given all my evidence
5 to my attorneys.

6 MS. MENNINGER: I'm going to
7 show you Defendant's Exhibit 10.

8 (Defendant's Exhibit 10,
9 [REDACTED] stamped [REDACTED], was
10 marked for identification.)

11 Q. Do you recognize Defendant's
12 Exhibit 10?

13 A. Yes.

14 Q. What is it?

15 A. It's an email correspondence
16 between [REDACTED] [REDACTED] and myself.

17 Q. On the second page, [REDACTED]
18 0008, do you see other emails with
19 headings but no text visible in the
20 screenshot?

21 A. Mm-hmm.

22 Q. Did you give each one of
23 those emails to your attorneys?

24 A. I have given all my
25 correspondence to my attorneys.

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2 Q. Do you see in the "Smart
3 View" column on the left side a folder
4 named "[REDACTED] [REDACTED]"?

5 A. Yes, I do.

6 Q. Does that folder contain
7 your correspondence with [REDACTED]

8 [REDACTED]

9 A. I didn't even know that
10 folder was there, but I presume so,
11 which is why I would have created it
12 in the first place.

13 Q. And it also shows a
14 substantial number of documents in
15 your Inbox.

16 A. Yes.

17 Q. Did you search your Inbox
18 for documents responsive to the
19 subpoena that I showed you a little
20 while ago?

21 A. I did. I wanted to be
22 thorough with my research, so I,
23 during that time frame, went through
24 every single email.

25 Q. You went through each one?

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2 A. I went through all of my
3 emails to make sure I gave all my
4 evidence to my lawyers.

5 Q. Did you search for keywords
6 or did you just read each email?

7 A. I read each email.

8 Q. And did you print out each
9 email?

10 A. I didn't print out. I saved
11 them to a USB stick.

12 Q. All of them or just the ones
13 that you thought were needed?

14 A. Just the ones that were
15 for -- just anything related to
16 Jeffrey, I sent over.

17 Q. And I think you testified
18 earlier you believe you still have
19 your FIT application in an email?

20 A. I haven't read it. I'm
21 assuming I have it.

22 MS. MENNINGER: I want to
23 show you Defendant's Exhibit 11.

24 (Defendant's Exhibit 11,
25 Maureen Callahan article, was

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2 marked for identification.)

3 A. [REDACTED], it's 9th of October,
4 sorry.

5 Q. Do you recognize this
6 document?

7 A. Let me go to the last
8 sentence. That catchphrase that I
9 mentioned earlier, as I said earlier,
10 I couldn't remember the contents of
11 the article earlier. I do apologize,
12 I got the date wrong from the 16th.
13 It was actually the 9th of October. I
14 couldn't remember the specific date.

15 I remember the specific
16 statement that really struck a chord
17 with me, which was, "The true number
18 of Epstein's victims will never be
19 known."

20 Q. So you believe this is the
21 document by Maureen Callahan that you
22 read last October that caused you to
23 come forward?

24 A. I'm presuming so, because
25 I've gone straight to the bank, and

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2 the sentence that I told you that I
3 remembered is this. So I'm assuming,
4 yes, that it's the same.

5 Q. And this article had a big
6 impact on you because it caused you to
7 come forward, I think you testified
8 earlier; is that correct?

9 A. That's correct.

10 Q. All right. Do you also see
11 on that last page, just right where
12 you were, there's a little box on the
13 left hand side. Can you read that out
14 loud, beginning "Today Jeffrey
15 Epstein..."

16 Do you see that in bold
17 letters on that last page?

18 A. █.

19 Q. Can you just read that
20 sentence to us?

21 A. "Today Jeffrey Epstein is a
22 free man, albeit one who routinely has
23 civil lawsuits brought against him by
24 young women out of court."

25 MS. MENNINGER: Okay.

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2 Defendant's Exhibit 12.

3 (Defendant's Exhibit 12,
4 website printout titled How to
5 Apply, was marked for
6 identification.)

7 Q. Do you recognize this
8 document?

9 A. I've seen it before, yes.

10 Q. And what do you recognize it
11 be?

12 A. It's the application how you
13 apply to FIT.

14 Q. It talks about students
15 applying to different parts of the
16 school, including arts and design or
17 business and technology.

18 Do you recall if you were
19 applying to a particular area at FIT
20 or a general admission?

21 A. I wanted to specialize in
22 fashion designing.

23 Q. Do you know if that was a
24 special area?

25 A. Yes, it was. FIT's the

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2 financial -- fashion school, so yeah.

3 Q. Did you visit the building
4 where FIT is located?

5 A. Yes, I did.

6 Q. Did you attend classes
7 there?

8 A. No.

9 Q. I mean did you visit a
10 class. I know you didn't enroll, but
11 did you visit a class?

12 A. No, I didn't. But I went to
13 the university, had a look around.

14 Q. Did you take a tour?

15 A. Not per se. I mean, I went
16 around, I looked at the university. I
17 didn't go on a big personalized tour
18 with a specific person, no.

19 Q. Did you talk to any of the
20 teachers there?

21 A. No, I didn't.

22 Q. Do you recall there being
23 multiple steps for applications to
24 FIT?

25 A. There's multiple steps on

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2 any college application form.

3 Q. Do you remember what those
4 steps were when you were applying?

5 A. No.

6 Q. Do you remember an original
7 application which had details?

8 A. I can't remember the
9 original application form, no.

10 Q. Do you remember there being
11 a separate essay portion?

12 A. Yes, I do remember that.

13 Q. Do you remember a separate
14 portion that relates to students who
15 are applying who are not U.S.
16 citizens?

17 A. I can't remember that. I
18 can't remember the specific form.

19 Q. Do you remember filling out
20 any special paperwork for someone who
21 was applying who was not a U.S.
22 citizen?

23 A. No, there was no paperwork
24 as such for that. Jeffrey Epstein was
25 sorting that out for me with his

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2 connections at FIT.

3 Q. So you don't believe you
4 filled that part out?

5 MR. GUIRGUIS: Objection.

6 A. I said I can't remember
7 filling that part out.

8 Q. Do you remember getting a
9 copy of your transcript from Queen
10 Margaret University?

11 A. I haven't got my transcripts
12 yet, but I can get them.

13 Q. Do you remember submitting
14 them to FIT?

15 A. I can't remember.

16 Q. Did you get a degree from a
17 school in Edinburgh, high school?

18 A. So I finished all my high
19 school qualification, which, you know,
20 my grades were good enough to get into
21 psychology and sociology in Edinburgh.

22 Q. What was the name of your
23 high school?

24 A. Grantown Grammar School.

25 Q. Did you get a transcript

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2 from that school to provide to FIT?

3 A. I think I was in the process
4 of getting my transcripts from Queen
5 Margaret. I did have a copy of my
6 high school grades as well. When you
7 fill out an application, you submit
8 all your grades, high school.

9 Q. And that's the one in
10 Scotland?

11 A. Yes, that's correct.

12 MS. MENNINGER: I think I've
13 only got a couple more questions,
14 but I got my piles messed up.
15 Can we take a two-minute break
16 and I can get organized and
17 finished.

18 (Time noted: 5:54 p.m.)

19 (Recess.)

20 (Time noted: 6:07 p.m.)

21 MS. MENNINGER: I'm going to
22 mark a new exhibit Defendant's
23 Exhibit 13.

24 (Defendant's Exhibit 13,

25 ████████ stamped ██████████ was

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2 marked for identification.)

3 Q. Do you recognize this
4 document?

5 A. Yes, I do.

6 Q. What is it?

7 A. It was an email sent to my
8 friend [REDACTED]

9 Q. Is that different than [REDACTED]
10 that you were with on the island?

11 A. I was never with [REDACTED] on the
12 island. It was [REDACTED]

13 Q. Do you remember testifying
14 about someone named [REDACTED]

15 A. [REDACTED] was my friend in New
16 York.

17 Q. Is that the same person you
18 were writing here, or is that a
19 different person?

20 A. It's the same person; it's
21 just I called her [REDACTED] It's a [REDACTED]
22 [REDACTED] name. She's [REDACTED] [REDACTED]

23 Q. How did you know [REDACTED]

24 A. I met her in New York.

25 Q. Do you know whether you paid

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2 for your plane ticket to come back to
3 New York from South Africa in February
4 of '07?

5 A. I didn't pay for my ticket.

6 Q. You did not?

7 A. No.

8 Q. Do you see in your email
9 exchange in Defendant's Exhibit 13
10 that you wrote to [REDACTED] on February 8th
11 of '07, "Not going to Miami anymore,
12 clearly, and have to pay for me flight
13 back."

14 It's in the second paragraph
15 towards the bottom.

16 A. Mm-hmm.

17 Q. Did you write that?

18 A. Yes.

19 Q. But you did not, in fact,
20 pay for your flight back?

21 A. No.

22 Q. Do you know what you meant
23 by "Not going to Miami anymore,
24 clearly..."?

25 A. I can't remember what that

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2 whole Miami thing was about. It never
3 came about, so I can't remember the
4 specific details on Miami. But it was
5 via Jeffrey Epstein.

6 Q. Okay. How did it happen
7 that you were writing, "I'm going to
8 have to pay for me flight back," but
9 you did not, in fact, pay for your
10 flight back?

11 A. Because Jeffrey Epstein and
12 I had a fight about my weight. So
13 that was probably during the argument,
14 the time frame that I had the argument
15 with Jeffrey. He said that he refused
16 to pay for my flight back if I didn't
17 get down to 52 kilograms.

18 Q. And how did it come about
19 that you did not pay for your flight
20 back?

21 A. I carried on losing weight
22 to try and get to the goal that
23 Jeffrey and Ghislaine had set for me,
24 which is 52 kilograms.

25 Q. How does that relate to

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2 payment for a flight?

3 MR. GUIRGUIS: Objection.

4 A. Well, I didn't pay for that
5 flight because Jeffrey was financing
6 me, so I wouldn't have had the money
7 to pay for my own flight back.

8 Q. But you said you were "going
9 to have to pay for my flight back,"
10 right?

11 A. That's correct.

12 Q. And then what changed?

13 MR. GUIRGUIS: Objection,
14 asked and answered.

15 A. I made up with Jeffrey. I
16 tried to meet my target weight of
17 52 kilograms.

18 Q. And how did you make up with
19 him?

20 A. I can't remember if it was
21 telephone call or email or message,
22 but there were various phone calls
23 that were made to my family home from
24 Ghislaine and Jeffrey during that time
25 frame.

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2 It was a very delicate time
3 because my family were up in arms the
4 fact I was told to be 52 kilograms,
5 which is not -- it can't be achievable
6 with my body frame, and they saw me
7 getting very ill.

8 And I didn't have the funds
9 to buy a flight back, so I had to do
10 what Ghislaine and Jeffrey told me do.

11 Q. What did you do?

12 A. Continue to lose weight.

13 Q. Did you see any medical
14 professionals while you were in South
15 Africa?

16 A. No.

17 Q. How did you communicate to
18 Jeffrey that you had decided to
19 continue losing weight?

20 A. So Jeffrey, Ghislaine,
21 again, we all corresponded by
22 telephonic call, BBM, message, my
23 house phone. I decided to lose
24 weight. I was given an ultimatum that
25 either I do it or I'm finished. At

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2 that point I had no option.

3 Q. If you wanted the flight
4 back.

5 A. If I wanted the flight back.
6 I had all my stuff in New York, I had
7 my life in New York, I was going to
8 FIT.

9 I didn't have any finances;
10 Jeffrey was funding me. So I was
11 stuck. I either had to do what
12 Ghislaine and Jeffrey told me do or I
13 was stuck, really.

14 Q. You were stuck at your
15 father and stepmother's house in South
16 Africa, where you grew up?

17 A. I didn't grow up with my
18 father and my stepmother.

19 Q. You grew up in South Africa?

20 A. I grew up in Johannesburg.

21 Q. When you say you were stuck,
22 you're describing a time you were in
23 South Africa?

24 A. I'm describing a time I was
25 on holiday visiting my family, that

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2 Jeffrey paid for.

3 Q. Okay. Did you finish your
4 answer?

5 A. Sorry, I just read here.
6 I'm describing a time that I was on
7 holiday visiting my family, that was
8 paid for by Jeffrey and Ghislaine.
9 They financed my ticket. They
10 financed every ticket. They financed
11 my whole lifestyle.

12 Q. Ghislaine financed your
13 ticket?

14 A. Well, they were one entity.
15 Ghislaine is Jeffrey's right-hand
16 woman. They --

17 Q. When did Ghislaine finance
18 this ticket?

19 A. It was through Jeffrey's
20 company that she worked with.

21 Q. Did you correspond by email
22 with Ghislaine about financing this
23 ticket?

24 A. No.

25 Q. You searched for emails with

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2 yourself and Ghislaine, correct?

3 A. That's correct.

4 Q. And you found none, correct?

5 A. That's correct.

6 Q. You found emails between
7 yourself and [REDACTED] [REDACTED] about the
8 plane ticket back, correct?

9 A. That's correct.

10 Q. But none with Ghislaine?

11 A. I never said once today that
12 I had email communication with
13 Ghislaine.

14 Q. But you just said that
15 Ghislaine financed your holiday in
16 South Africa. And what is your basis
17 for saying that?

18 MR. GUIRGUIS: Objection.
19 She did not say that Ghislaine
20 financed it.

21 Q. What is your basis for
22 referring to Ghislaine financing your
23 holiday in South Africa?

24 MR. GUIRGUIS: Objection.

25 A. So Ghislaine is Jeffrey's

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2 right-hand man, so she -- so we report
3 to her. I told them I wanted to go
4 and see my family. They paid for my
5 flight.

6 Q. You told them when they were
7 together in the same place?

8 A. I can't remember the
9 specific location. I just wanted to
10 go on holiday to see my family, which
11 Ghislaine and Jeffrey paid for.

12 Q. How did Ghislaine pay for
13 it?

14 A. I don't know. You should
15 ask Ghislaine.

16 Q. Did she write a check?

17 A. You should ask Ghislaine.

18 Q. Did she put it on a credit
19 card?

20 MR. GUIRGUIS: Objection.

21 A. You should ask Ghislaine.

22 Q. Do you have any idea how
23 Ghislaine Maxwell paid for your trip
24 to South Africa?

25 MR. GUIRGUIS: Objection.

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2 A. You should ask Ghislaine.

3 Q. Is that an answer?

4 MR. GUIRGUIS: Objection.

5 Q. Do you have an answer?

6 MR. GUIRGUIS: Objection.

7 A. You should ask Ghislaine how
8 she funded my ticket.

9 Q. I appreciate the tip.

10 Do you have any information
11 inside of your head about how
12 Ghislaine financed your trip to South
13 Africa?

14 MR. GUIRGUIS: Counsel, she
15 has repeatedly stated that she
16 does not know. You keep asking
17 her the same question.

18 MS. MENNINGER: No, she has
19 repeated to he me that she
20 needed -- I needed to ask my
21 client.

22 MR. GUIRGUIS: Hold on.

23 "QUESTION: Ghislaine funded
24 your ticket?

25 "ANSWER: Well, she was his

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2 right-hand...

3 "QUESTION: When did
4 Ghislaine finance this ticket?

5 "ANSWER: Well, it was
6 through Jeffrey's company that
7 she worked with."

8 Are you asking a different
9 question, Counsel? Am I
10 misunderstanding?

11 MS. MENNINGER: Yeah, you
12 are.

13 MR. GUIRGUIS: Please.

14 MS. MENNINGER: Can you read
15 the question that I asked.

16 (Requested portion of the
17 record was read back.)

18 A. In my head, I can't remember
19 how she financed, how she and Jeffrey
20 financed.

21 Q. Did you see any invoice paid
22 by Ghislaine for your ticket?

23 A. No. But a ticket was
24 produced which enabled me to fly back
25 to my family, so a ticket was produced

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2 by Ghislaine and Jeffrey in order for
3 me to fly home to see my family.

4 Q. How did Ghislaine produce a
5 ticket to you?

6 A. I can't remember.

7 Q. Did it come by email?

8 MR. GUIRGUIS: Objection.

9 A. I've provided all the emails
10 that I have.

11 Q. That's not the question.

12 Did the ticket get produced
13 to you by Ghislaine by email?

14 MR. GUIRGUIS: Objection.

15 A. No.

16 Q. Did it get sent by a courier
17 to you from Ghislaine?

18 MR. GUIRGUIS: Objection.

19 A. I can't remember how I
20 received the ticket specifically.

21 Q. Your final line to [REDACTED] is,
22 "You must save some partying energy
23 for me when I come back. Lots of
24 love, Sarah."

25 Correct?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Mm-hmm.

3 Q. Is that right?

4 A. Mm-hmm.

5 Q. In the first paragraph, do
6 you advise Sarah, "Still very loved
7 up, so much so that he asked me to
8 move in with him and I accepted. All
9 good," exclamation point, exclamation
10 point, exclamation point -- well,
11 about eight of them, or ten.

12 A. Mm-hmm.

13 Q. Is that what you wrote?

14 A. Yes, that's what you wrote.

15 Q. Is that true?

16 A. Yes.

17 Q. Looking back at Defendant's
18 Exhibit 8, which you testified earlier
19 were your communications with [REDACTED]
20 [REDACTED] or some of them --

21 A. That's Exhibit 9.

22 MR. GUIRGUIS: We seem to be
23 missing Exhibit 8 from the stack.

24 MS. MENNINGER: I checked it
25 during the break.

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: It's just out
3 of order.

4 THE WITNESS: Is this
5 Defendant's Exhibit 8?

6 MS. MENNINGER: Eight.

7 THE WITNESS: Is this
8 Exhibit 8?

9 MR. GUIRGUIS: Yes, it is.

10 Q. So the emails with [REDACTED]
11 Maybe I wrote it down wrong. I
12 apologize.

13 MR. GUIRGUIS: With who?
14 I'm sorry?

15 MS. MENNINGER: [REDACTED] --

16 THE WITNESS: That was
17 Exhibit -- [REDACTED], gosh. This is
18 Exhibit 9 between [REDACTED] and
19 myself.

20 Q. Okay. And it's got [REDACTED]
21 0004 and 0005; is that right? Just
22 making sure we're looking at the same
23 thing. On the lower right-hand
24 corner.

25 A. Yes, 000004.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. All right. Those are emails
3 that you and [REDACTED] exchanged in
4 February of 2007, correct?

5 A. That's correct.

6 Q. And can you read to us the
7 email at the bottom from you to [REDACTED]
8 on February 8, 2007.

9 A. "Hey sweetie, how are you?
10 I'm busy writing my essay for FIT.
11 What fun. I had a bit of a fight with
12 Jeffrey. [REDACTED], well, what can you do.
13 I meant to ask in my last email can
14 you please email me your address. It
15 looks like I'm not going to Miami
16 either. Well, at least I will be back
17 in NY. Hope you are well and look
18 forward to seeing you soon. Please
19 tell [REDACTED] I say hi. Lots of hugs
20 and kisses, Sarah."

21 Q. Were you writing your FIT
22 essay in February 2007 while you were
23 in South Africa?

24 A. Yeah. It took me quite some
25 time writing my essay, so it was over

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1 HIGHLY CONFIDENTIAL AEO

2 a duration of...

3 Q. Did you email your essay
4 from South Africa to Ghislaine
5 Maxwell?

6 A. I don't recall emailing her.

7 Q. Defendant's Exhibit 10, I
8 think it is, with [REDACTED] [REDACTED]?

9 A. Yes.

10 MR. GUIRGUIS: Hold on a
11 second. Let me just find my
12 copy.

13 Q. And I show [REDACTED] 006 is
14 the first one in the lower right-hand
15 corner.

16 A. Yes.

17 Q. So did you correspond with
18 [REDACTED] about faxing your FIT
19 application in to her on or about
20 February 8, 2007?

21 A. Yes.

22 Q. Did you also ask her to look
23 into booking a flight for you back to
24 New York?

25 A. That's correct.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you give her the date
3 you wanted to fly back?

4 A. That's correct.

5 Q. And the next email down, did
6 you say, "Hi, can you please phone
7 back?"

8 A. Mm-hmm.

9 Q. Was that to [REDACTED] or to
10 Jeffrey?

11 A. I can't remember who it was
12 to. Jeffrey never corresponded
13 directly; he either did it through
14 [REDACTED] [REDACTED] or -- so I can't remember
15 who phoned me back.

16 Q. Can you turn two pages back
17 to where it says [REDACTED].

18 Do you see those emails?

19 A. Mm-hmm.

20 MR. GUIRGUIS: Read the
21 emails, don't just...

22 Q. Did [REDACTED] ask what type of
23 visa you were coming on, student or
24 tourist?

25 MR. GUIRGUIS: Hold on,

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1 HIGHLY CONFIDENTIAL AEO

2 Counsel.

3 Are you through with it?

4 THE WITNESS: Sorry, I
5 haven't finished reading yet.

6 Q. Did [REDACTED] ask what type of
7 visa you were coming on, student or
8 tourist?

9 A. That's correct.

10 Q. And what was your response?

11 A. I can't remember what my
12 response was.

13 Q. Is it visible in this
14 exhibit?

15 A. No.

16 Q. All right. You said you
17 left New York in late April --

18 A. That's correct.

19 Q. -- 2007?

20 Did you find any records
21 reflecting that departure when you
22 were going through all of your emails
23 and your other documents?

24 A. No.

25 Q. When was the last time you

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1 HIGHLY CONFIDENTIAL AEO

2 saw Jeffrey Epstein?

3 A. April 2007.

4 Q. Where did you see him last?

5 A. In New York.

6 Q. Where in New York?

7 A. I can't remember where I
8 last saw him.

9 Q. Do you remember what
10 happened the last time you saw him?

11 A. No, I can't remember what
12 happened.

13 Q. Do you know whether he gave
14 you any money the last time you saw
15 him?

16 A. No, he didn't give me money.

17 Q. Do you know if you talked
18 about FIT the last time you saw him?

19 A. I didn't really want
20 anything do with Jeffrey and Ghislaine
21 at that stage. So at that point I did
22 not talk about FIT anymore with them.
23 I just wanted to go back home to my
24 mom.

25 Q. And this is when you were

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1 HIGHLY CONFIDENTIAL AEO

2 living with [REDACTED]

3 A. Yes.

4 Q. When did you decide you
5 didn't want to have anything to do
6 with Jeffrey Epstein?

7 A. After my trip to South
8 Africa, my relationship deteriorated
9 with Jeffrey and Ghislaine. So I
10 didn't really want to be here anymore.

11 Q. When did you make that
12 decision?

13 A. I was kind of toying with
14 the idea of going back. I was in a
15 bit of a mess after what I had been
16 through with Ghislaine and Jeffrey,
17 so -- yeah.

18 Q. And who purchased your plane
19 ticket to London?

20 A. I think it was my mom. I
21 can't remember.

22 Q. Were you still taking the
23 medications at the time you went back?

24 A. Yes.

25 Q. And you returned from South

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1 HIGHLY CONFIDENTIAL AEO

2 Africa in February 2007, correct?

3 A. That's correct.

4 Q. And that's when you made the
5 decision to break with Jeffrey by
6 moving in with [REDACTED] correct?

7 A. I wanted to distance myself
8 from Jeffrey. Things weren't great.
9 What he was doing was wrong and what
10 he was doing to me was wrong, and I
11 got pretty depressed about it. I was
12 in -- I was stuck in a dark hallway.
13 I was basically being abused by a man,
14 and I -- I didn't -- I didn't know
15 what to do, where to go.

16 Q. Did you have a bank account
17 in New York?

18 A. Yes, I did.

19 Q. With which bank?

20 MR. GUIRGUIS: Objection.
21 Same objection I gave at the
22 beginning, financial information
23 for a nonparty witness.

24 MS. MENNINGER: The name of
25 the bank. The name of the bank.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Let me ask you this: What
3 did you do with the cash you received
4 from Jeffrey Epstein? Did you put it
5 in the bank?

6 A. No. I spent it on food,
7 cabs. General expenses.

8 Q. Where did you get the money
9 that you put into the bank?

10 A. From the occasional modeling
11 job that I got, freelance modeling.

12 Q. Were you still modeling in
13 the spring of 2007?

14 A. No.

15 MR. GUIRGUIS: Off the
16 record.

17 (An off-the-record
18 discussion was held.)

19 MR. GUIRGUIS: Back on the
20 record.

21 MS. MENNINGER: I think if
22 you can just give my co-counsel
23 and I a minute off the record.

24 (Time noted: 6:28 p.m.)

25 (Recess.)

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1 HIGHLY CONFIDENTIAL AEO

2 (Time noted: 6:29 p.m.)

3 Q. In February of 2007, you
4 decided to make a break with Jeffrey
5 Epstein, correct?

6 A. No, I didn't decide to make
7 a break with Jeffrey Epstein. He let
8 me down with my FIT application and he
9 wasn't taking me seriously, and he
10 wasn't following through his end of
11 the deal, basically.

12 Q. How did he let you down with
13 your FIT application?

14 A. Because I didn't go to FIT.

15 Q. And why didn't you go to
16 FIT?

17 A. Because I wanted to go home
18 back to my mom.

19 Q. When did you decide that he
20 let you down with the FIT application?

21 A. Well, I think it was pretty
22 much after that incident with Alan and
23 the fact that I had been sexually
24 abused for months on end by Jeffrey, I
25 kind of wanted to call it time with

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1 HIGHLY CONFIDENTIAL AEO

2 him.

3 I saw how he was acting with
4 the other girls. I saw how they got
5 pretty mentally messed up as well; for
6 example, [REDACTED] So...

7 Q. And you saw that before you
8 went to South Africa?

9 A. Yes.

10 Q. And while you were in South
11 Africa, you got in a fight with
12 Jeffrey.

13 A. That's correct.

14 Q. And you didn't want to lose
15 this weight, correct?

16 A. I didn't want to lose this
17 weight because I would be dead if I
18 weighed 52 kilograms.

19 Q. You didn't want to lose the
20 weight in South Africa, correct?

21 A. I wanted to -- I was
22 desperate to go to FIT. I tried to
23 lose as much weight as I could for
24 Jeffrey and Ghislaine.

25 Q. While you were in South

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1 HIGHLY CONFIDENTIAL AEO

2 Africa, you did some reevaluating of
3 your life?

4 MR. GUIRGUIS: Objection.

5 A. Reevaluating of my life? I
6 wouldn't say I spent the holiday
7 reevaluating my life, no.

8 Q. Were you happy when you were
9 in South Africa?

10 A. I was concerned because I
11 was being asked and being hounded to
12 find a 18-year-old PA for Jeffrey, and
13 I knew that was wrong because he would
14 do exactly the same thing to that girl
15 that he did to me, and I would not let
16 him do that to another girl.

17 Q. So when you were in South
18 Africa, you decided to make a break
19 from Jeffrey.

20 MR. GUIRGUIS: Objection.

21 A. I didn't decide to make a
22 break; I decided to distance myself
23 from Jeffrey. Not make a break, but
24 to distance myself.

25 Q. When you came back, you

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1 HIGHLY CONFIDENTIAL AEO

2 moved in with [REDACTED]

3 A. That's correct.

4 Q. You can't remember the last
5 time that you saw Jeffrey?

6 MR. GUIRGUIS: Objection.

7 That's not the testimony.

8 A. No.

9 MS. MENNINGER: No further
10 questions. Thank you.

11 THE WITNESS: Thank you.

12 MS. MENNINGER: Do you have
13 any?

14 MR. GUIRGUIS: Give me one
15 second to confer.

16 We have no questions.

17 MS. MENNINGER: Counsel,
18 we're going to, unfortunately,
19 before we go off the record, need
20 to leave the deposition open,
21 just because there are some email
22 documents that were referenced
23 but not produced. And we can
24 follow up and have a discussion
25 with counsel about that.

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Okay. So on
3 the record -- we can carry on the
4 conversation, certainly, off the
5 record.

6 But while we're on the
7 record, I will say that my
8 understanding is that those
9 documents were all produced to
10 you, including all the emails
11 that you asked her about, and
12 where are the missing emails, and
13 she kept saying they'd been
14 produced to her attorneys. My
15 understanding is that the
16 attorneys did provide them to
17 defense counsel.

18 MS. MENNINGER: Well,
19 there's a current passport that
20 we know was not produced, there
21 is an FIT application that we
22 know was not produced, and I
23 believe there are emails that
24 were not produced.

25 And I'm happy to have the

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1 HIGHLY CONFIDENTIAL AEO
2 conversation continue off the
3 record, but I'm telling you those
4 are some of my recollections.

5 MR. GUIRGUIS: Okay. And to
6 be clear so that I'm not
7 misrepresenting, I see that I
8 said there were documents and the
9 emails. I meant to clarify, as
10 in the emails I know were
11 produced.

12 I can't speak to any other
13 documents that you might want to
14 raise a dispute about. But with
15 respect to the emails that you
16 said, my understanding, at least
17 as I sit here, is that they were
18 produced.

19 That said, I think we can go
20 off the record and resolve any
21 other issues between counsel and
22 I.

23 (Time noted: 6:34 p.m.)
24
25

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HIGHLY CONFIDENTIAL AEO

[REDACTED]

Signed and subscribed to
before me, this _____ day
of _____ 2017.

Notary Public

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1

2

C E R T I F I C A T E

3 STATE OF NEW YORK)

:

4 COUNTY OF NEW YORK)

5

6

7 I, Jeremy Richman, a Notary Public
8 within and for the State of New York, do hereby
9 certify:

10

11 THAT [REDACTED], the witness
12 whose deposition is hereinbefore set forth, was
13 duly sworn by me and that such deposition is a
14 true record of the testimony given by such
15 witness.

16 I further certify that I am not
17 related to any of the parties to this action by
18 blood or marriage; and that I am in no way
19 interested in the outcome of this matter.

20 IN WITNESS WHEREOF, I have hereunto
21 set my hand this 19th day of February 2017.



22 [Signature]

23 Jeremy Richman

24

25

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9	picture marked for identification.)	
10	(Defendant's Exhibit 2, hand-drawn	149
11	picture, was marked for	
12	identification.)	
13	(Defendant's Exhibit 3, affidavit,	262
14	was marked for identification.)	
15	(Defendant's Exhibit 4,	274
16	██████████, was marked for	
17	identification.)	
18	(Defendant's Exhibit 5, jury trial	323
19	demand, was marked for	
20	identification.)	
21	(Defendant's Exhibit 6, ██████	335
22	stamped ██████████, was marked	
23	for identification.)	
24	(Defendant's Exhibit 7, ██████	339
25	stamped ██████████, was marked	

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1 for identification.)

2 (Defendant's Exhibit 8, Notice of 363

3 Service of Rule 45 Subpoena and

4 Notice of Deposition of [REDACTED]

5 [REDACTED], was marked for

6 identification.)

7 (Defendant's Exhibit 8, [REDACTED] 377

8 stamped [REDACTED], was marked

9 for identification.)

10 (Defendant's Exhibit 10, [REDACTED] 384

11 stamped [REDACTED], was marked

12 for identification.)

13 (Defendant's Exhibit 11, Maureen 386

14 Callahan article, was marked for

15 identification.)

16 (Defendant's Exhibit 12, website 389

17 printout titled How to Apply, was

18 marked for identification.)

19 (Defendant's Exhibit 13, [REDACTED] 393

20 stamped [REDACTED] was marked

21 for identification.)

22

23 QUESTIONS INSTRUCTED NOT TO ANSWER

24 do you have any source of income? 10

25 so I'm going to ask you a last 12

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1 time: Do you have any source of
2 income?
3 what is your partner's occupation? 13
4 and where do your parents live? 14
5 [REDACTED], there was a question 15
6 pending when you took a break with
7 your lawyers. Can you please
8 answer the question.
9 what is your partner's cell phone 28
10 number?
11 and you're staying where while 31
12 you're here?
13 have you been promised that you 34
14 would have counsel to help you
15 bring a lawsuit against a number of
16 people?
17 what's the private legal matter? 172
18 what did you talk about with Alan 184
19 Dershowitz?
20 did you sign a common interest 185
21 agreement with Jeffrey?
22 did he do anything in terms of 199
23 contacting anyone on your behalf?
24 what was the specific legal matter 199
25 that you were seeking

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1 representation for?

2 who prescribed it to you? 204

3 so please tell me how to reach your 241

4 stepmother, [REDACTED] [REDACTED].

5 when did you see that? 284

6 when did you provide them to your 363

7 counsel?

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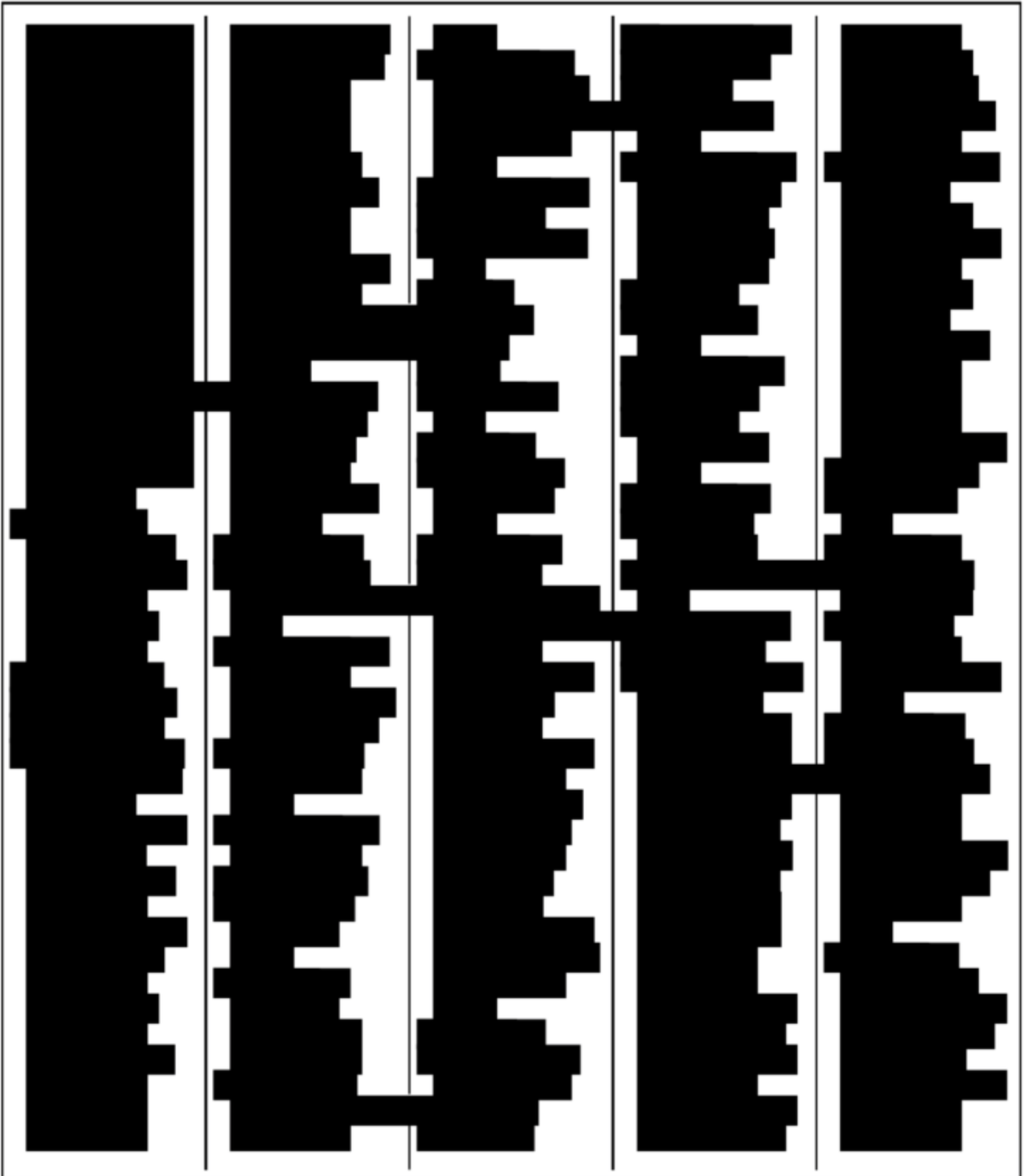
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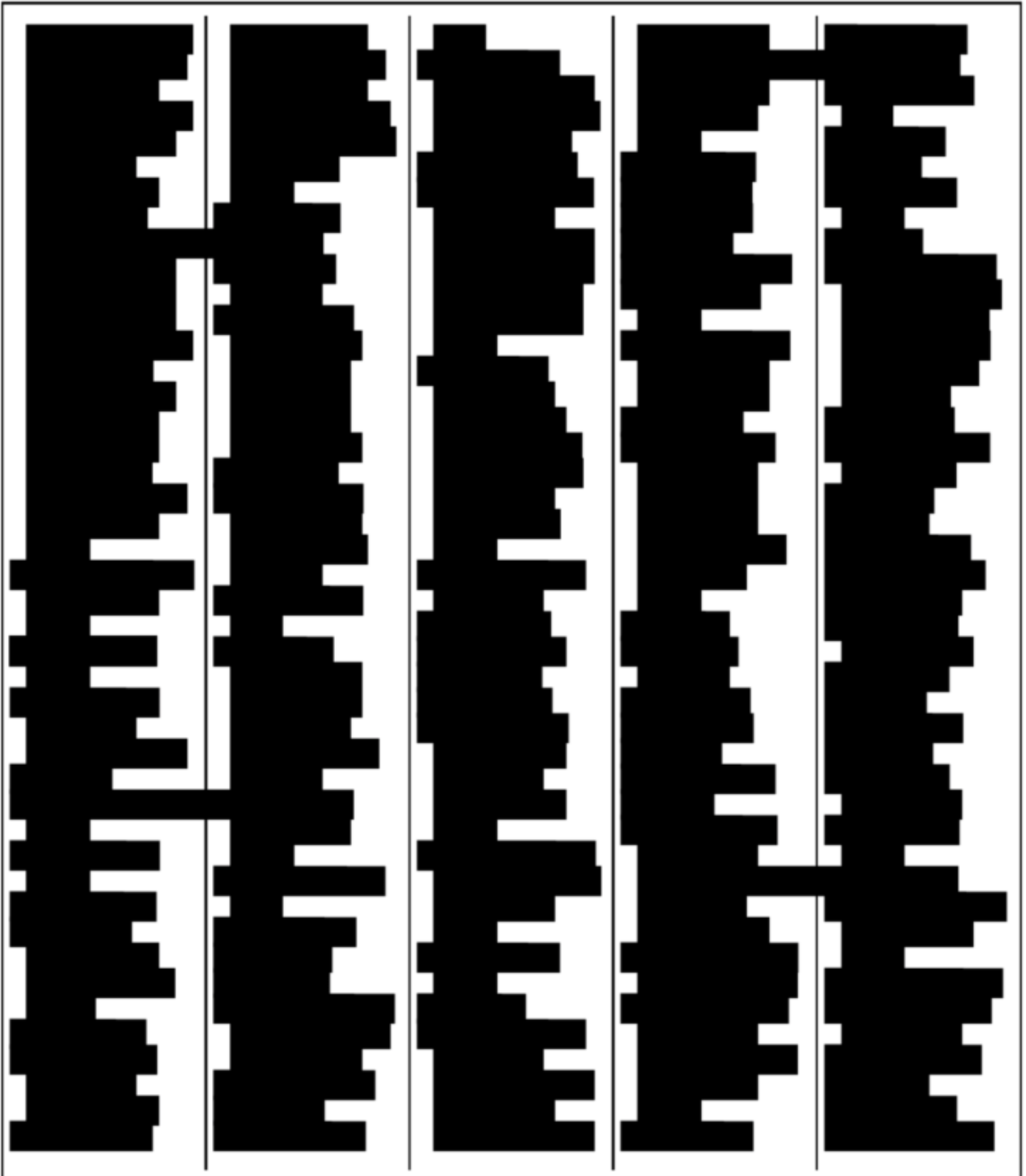
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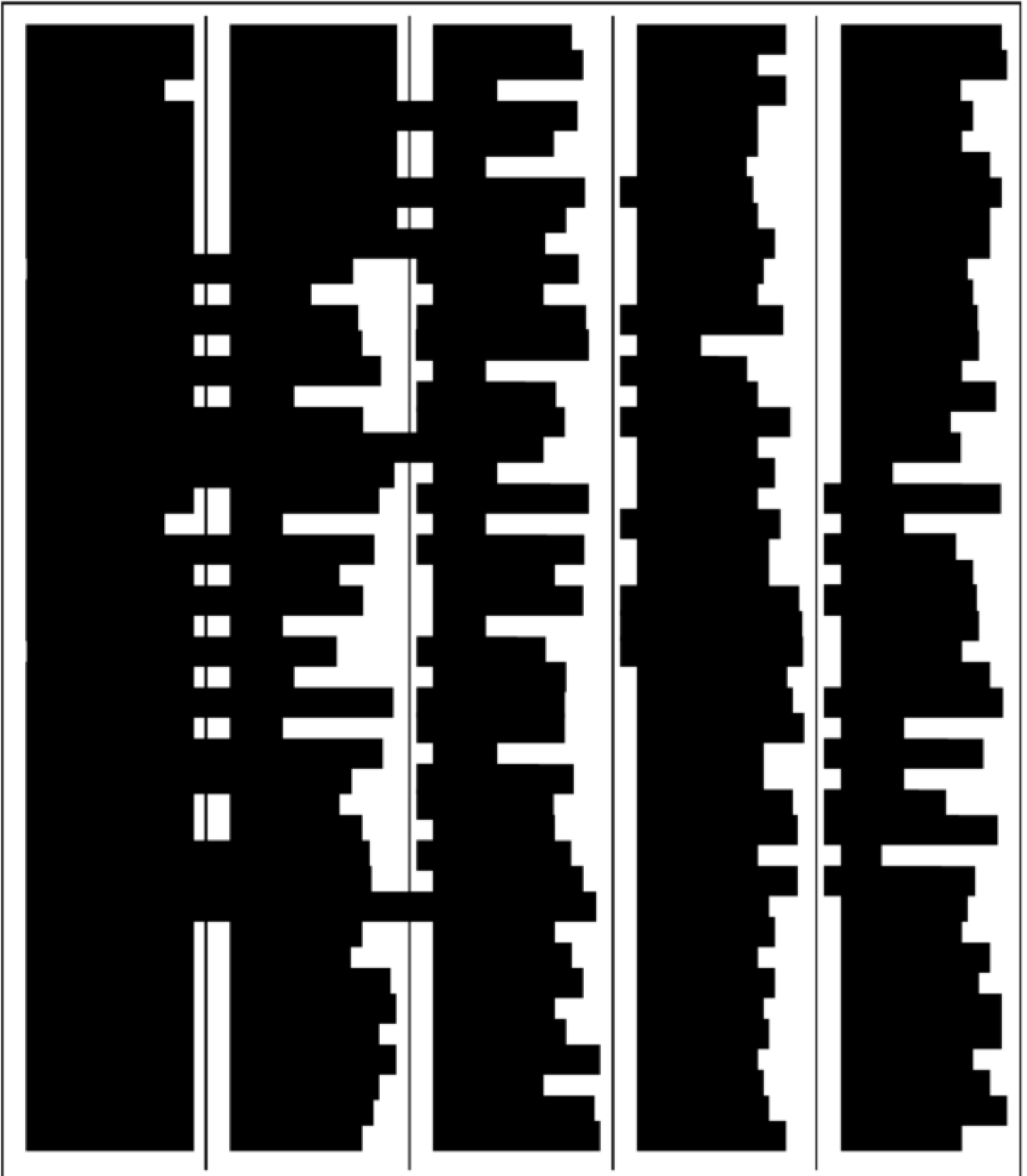
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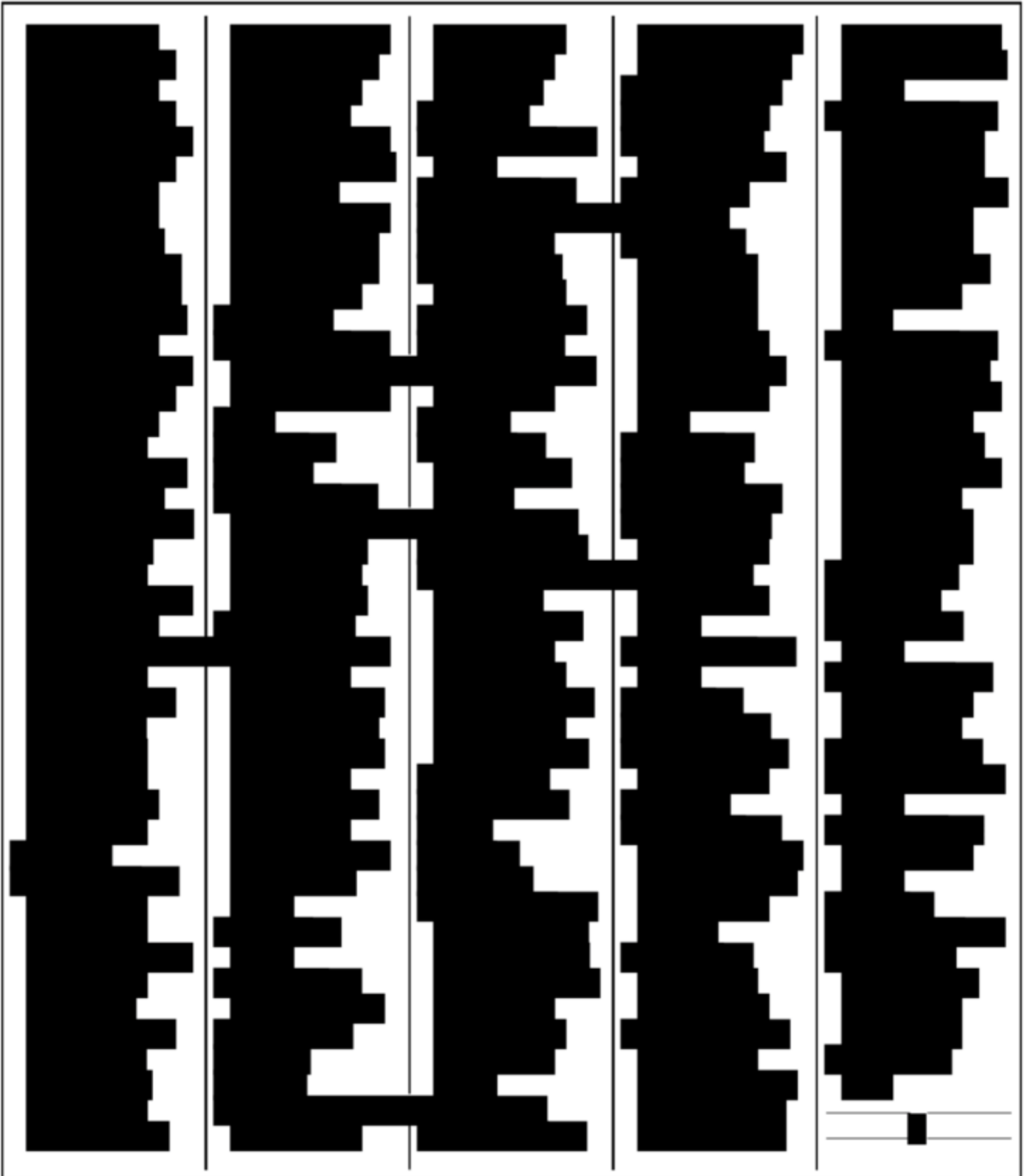
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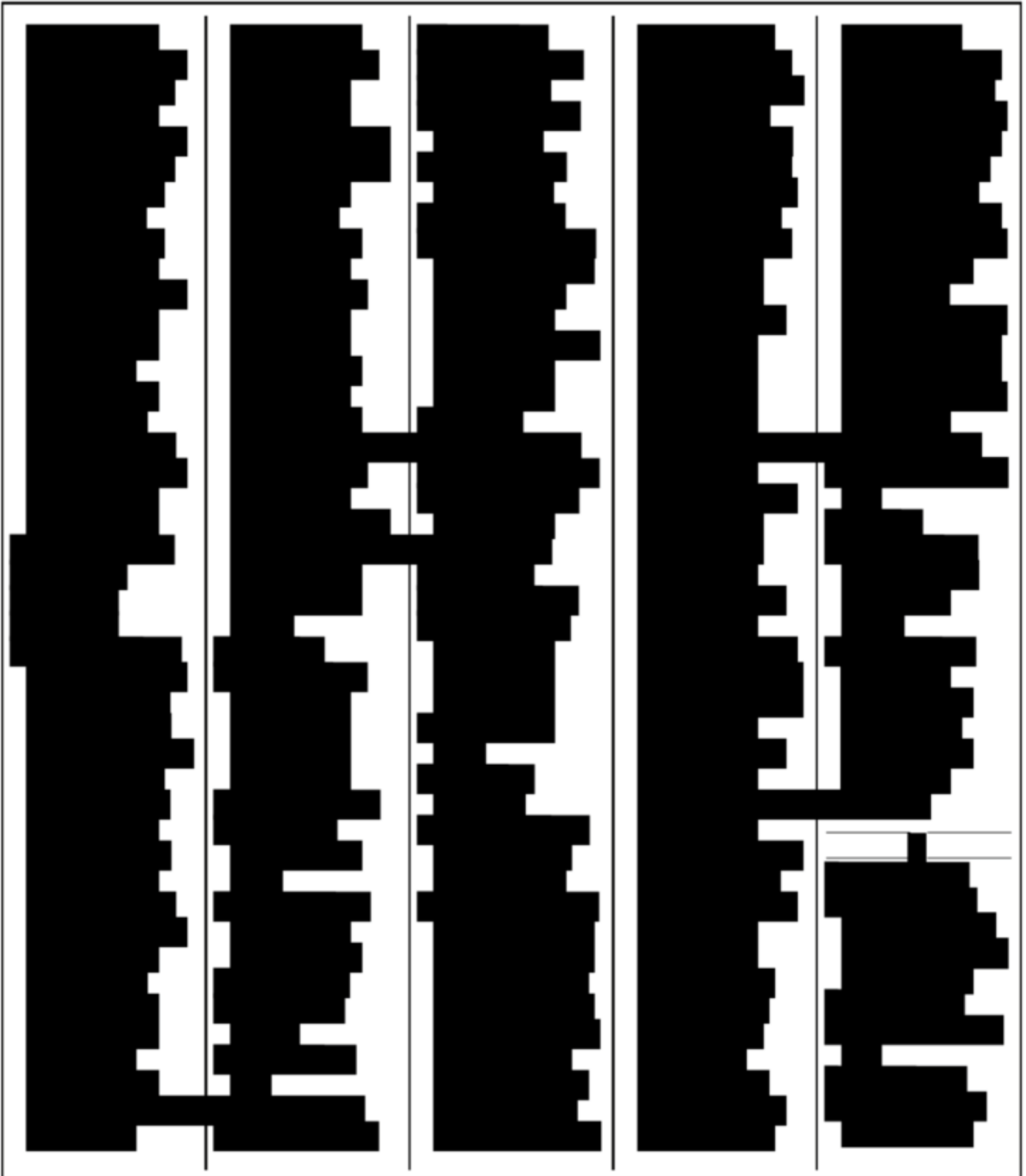
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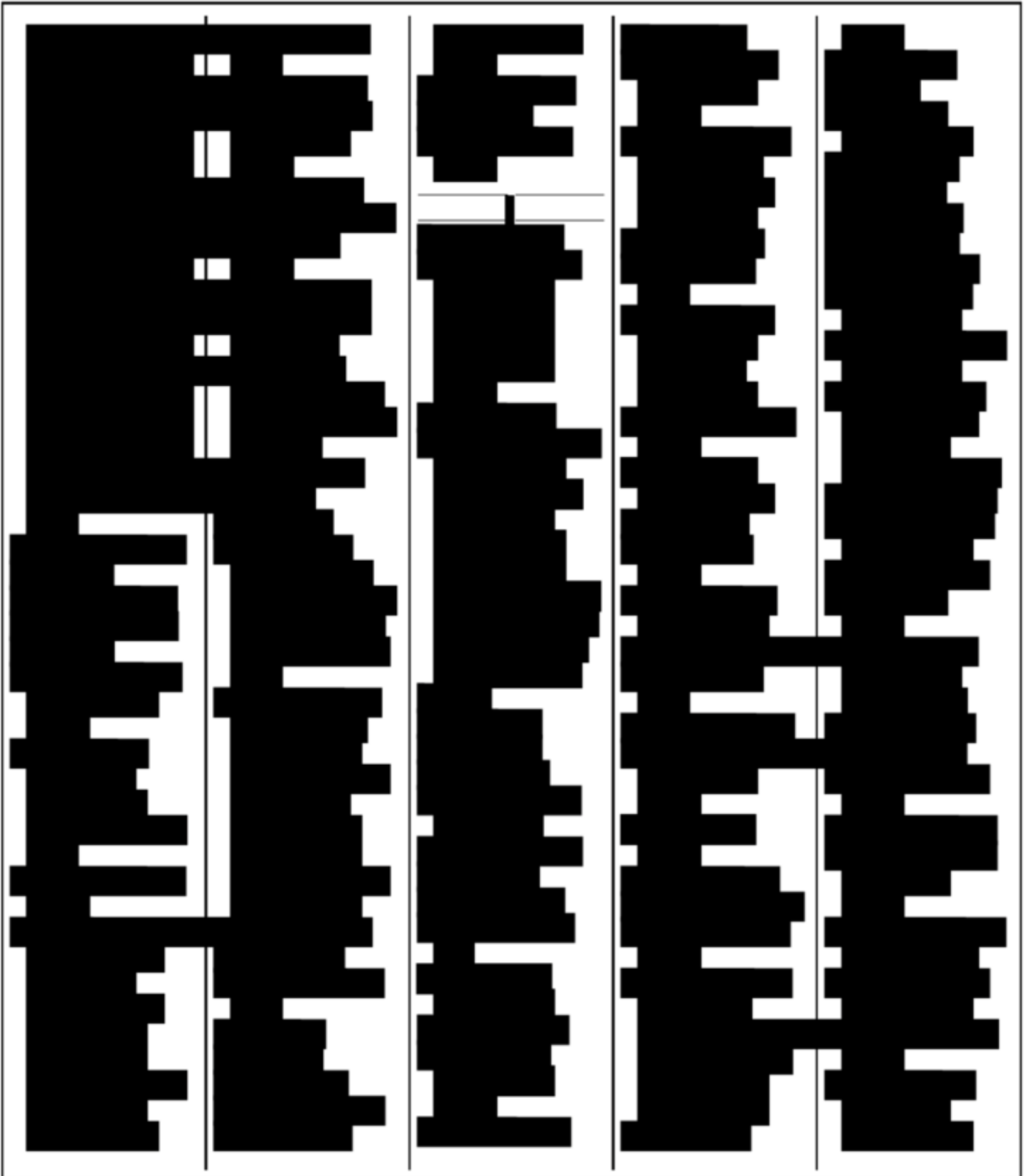
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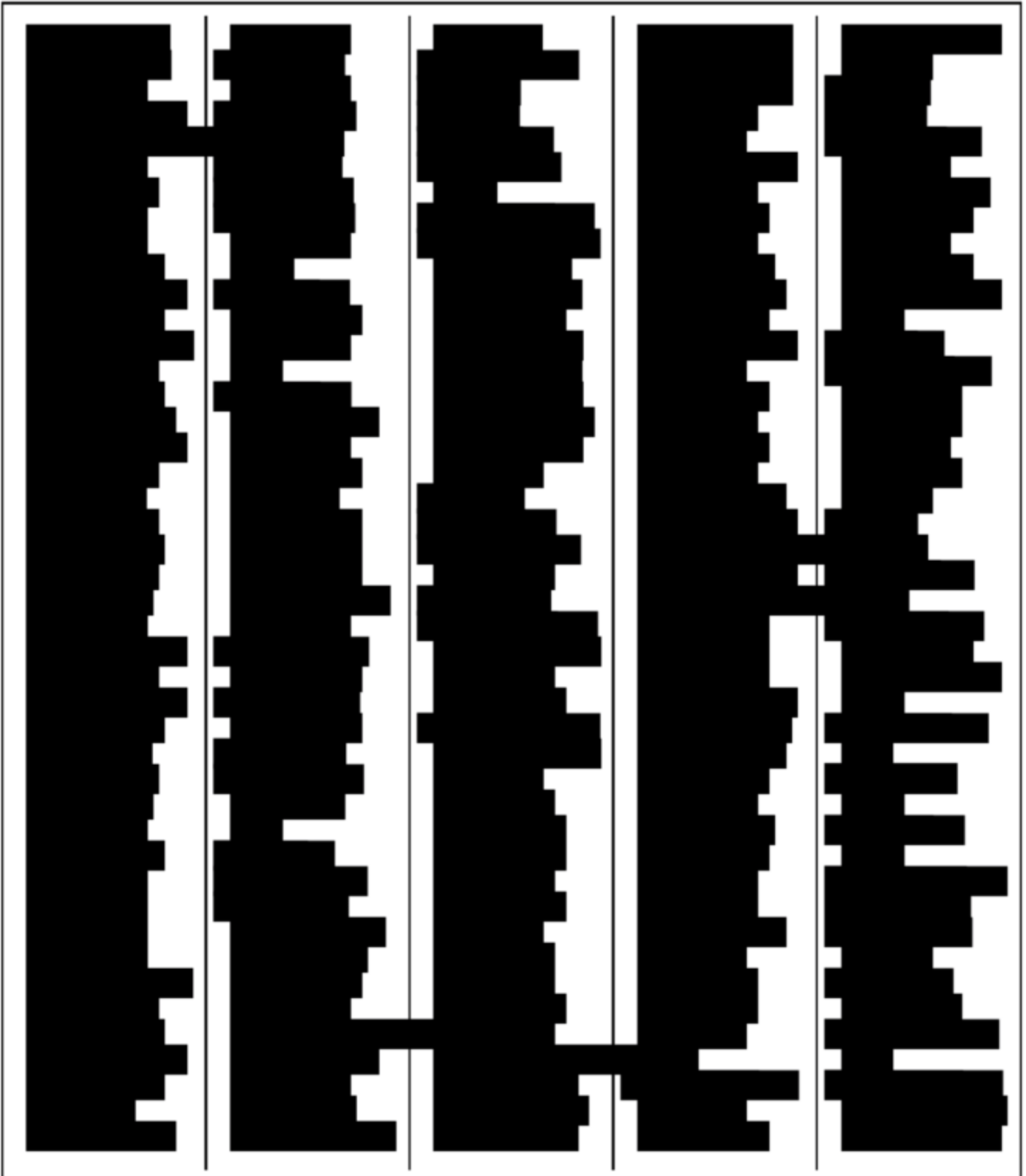
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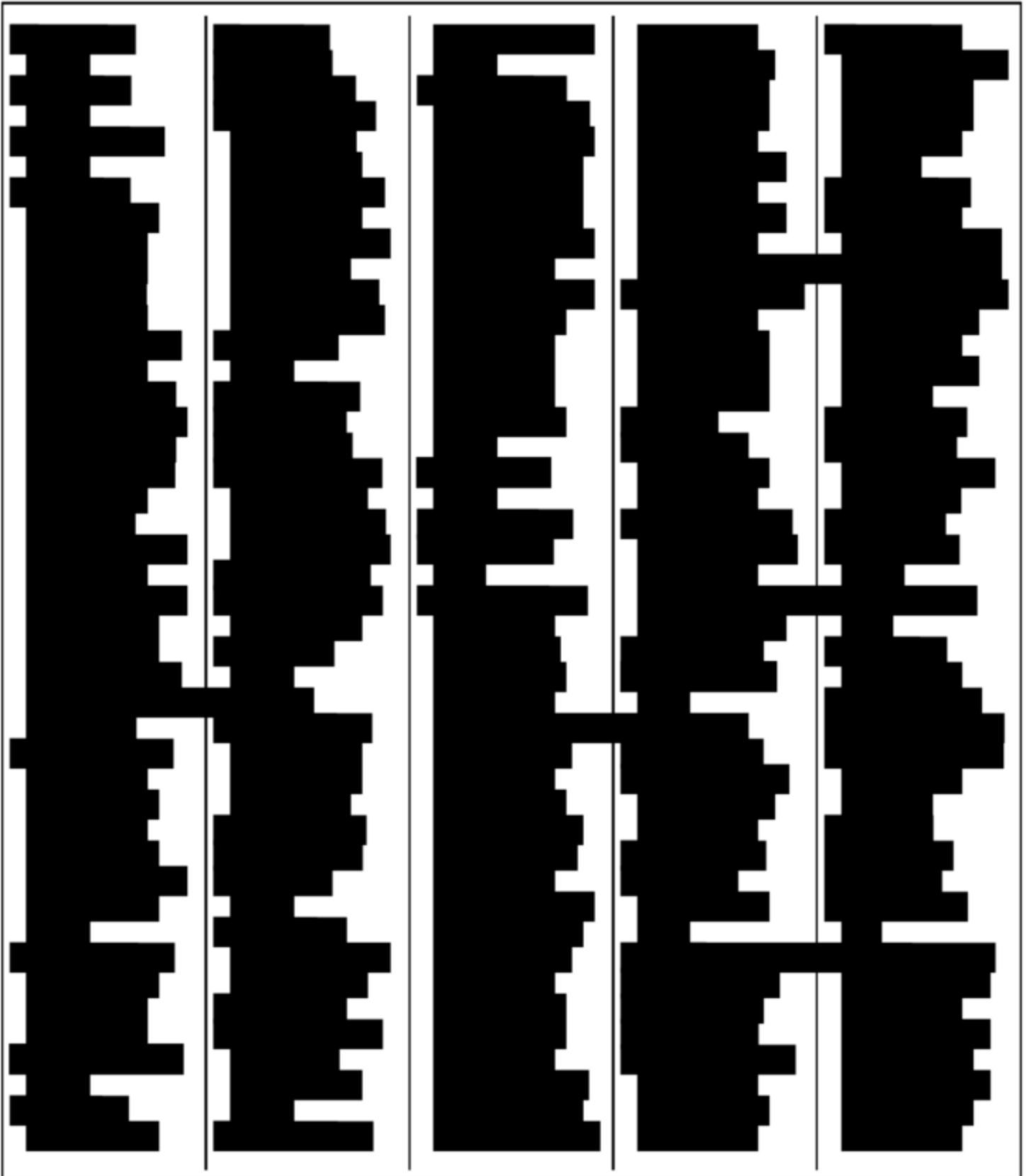
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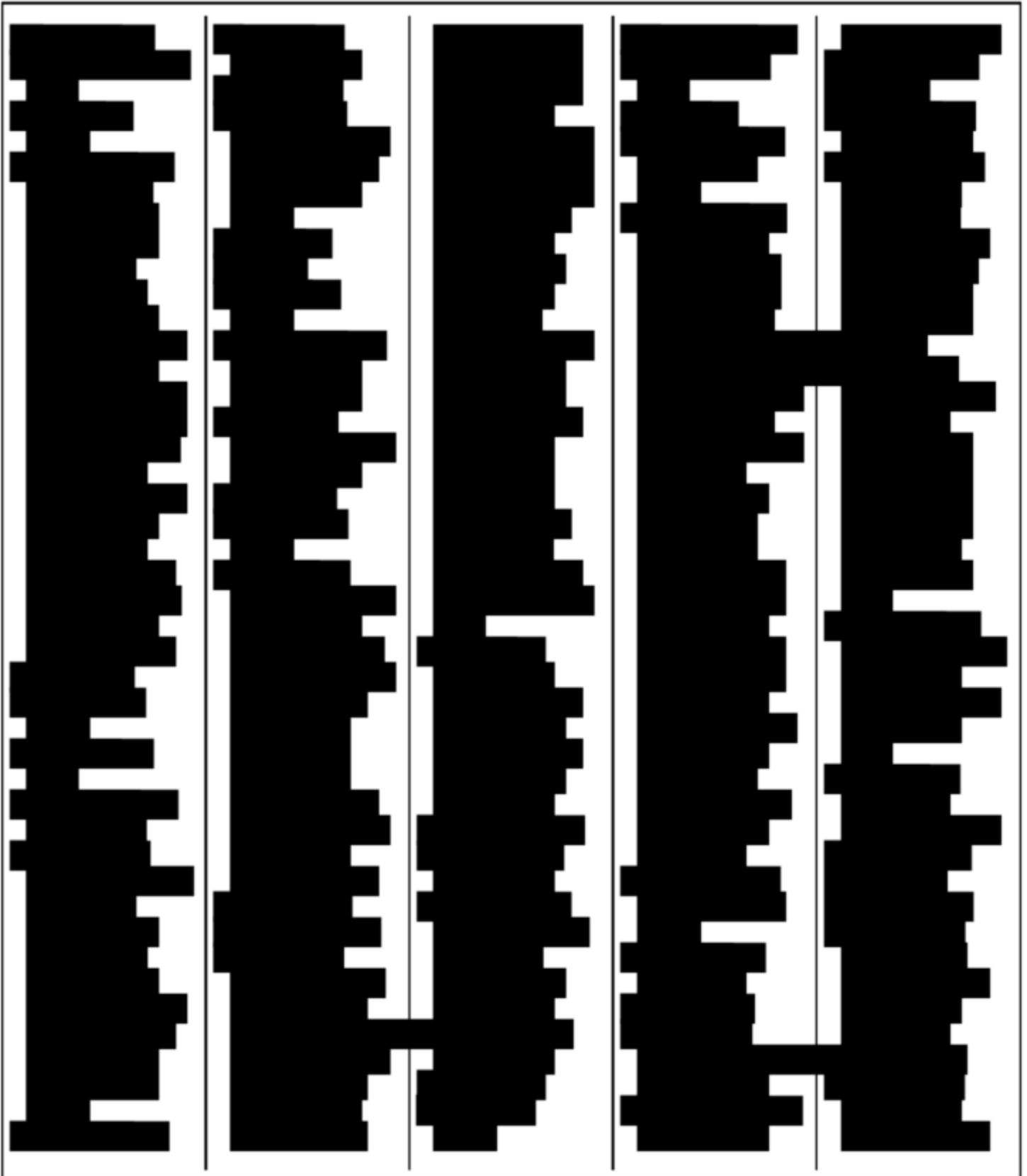
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1. Introduction The purpose of this study is to investigate the effects of a new educational program on student performance. The program is designed to enhance critical thinking and problem-solving skills through a series of interactive modules.	2. Methodology The study employed a quasi-experimental design, comparing the performance of two groups of students: one that participated in the new program and another that did not. Data was collected through standardized tests and surveys.	3. Results The results of the study indicate that students who participated in the new program showed significantly higher scores on the standardized tests compared to the control group. This suggests that the program is effective in improving student performance.	4. Conclusion Based on the findings, it is concluded that the new educational program has a positive impact on student performance. Further research is needed to explore the long-term effects of the program and to identify the specific components that contribute to its success.	5. References Smith, J. (2018). <i>Improving Student Performance through Innovative Teaching Methods</i>. New York: Academic Press. Johnson, A. (2019). <i>The Impact of Technology on Education</i>. London: Routledge.
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一	二	三	四	五
六	七	八	九	十
十一	十二	十三	十四	十五
十六	十七	十八	十九	二十
二十一	二十二	二十三	二十四	二十五
二十六	二十七	二十八	二十九	三十
三十一	三十二	三十三	三十四	三十五
三十六	三十七	三十八	三十九	四十
四十一	四十二	四十三	四十四	四十五
四十六	四十七	四十八	四十九	五十
五十一	五十二	五十三	五十四	五十五
五十六	五十七	五十八	五十九	六十
六十一	六十二	六十三	六十四	六十五
六十六	六十七	六十八	六十九	七十
七十一	七十二	七十三	七十四	七十五
七十六	七十七	七十八	七十九	八十
八十一	八十二	八十三	八十四	八十五
八十六	八十七	八十八	八十九	九十
九十一	九十二	九十三	九十四	九十五
九十六	九十七	九十八	九十九	一百

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