

EXHIBIT 5

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

██████████,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of ██████████, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

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5

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9

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BY: MARSHALL DORE LOUIS, ESQ.

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14

15 ALSO PRESENT: Ryan Kick, Videographer

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1 THE VIDEOGRAPHER: We are now on the
2 record. This is begins Videotape No. 1 in the
3 deposition of [REDACTED], in the matter of
4 [REDACTED] versus Ghislaine Maxwell.

5 Today is May 18th, 2016. The time is
6 9:04 a.m. This deposition is being taken at
7 401 East Las Olas Boulevard, Fort Lauderdale,
8 Florida.

9 The videographer is Ryan Kick. The court
10 reporter is Kelli Ann Willis. We both
11 represent Magna Legal Services.

12 Will counsel and all parties present state
13 their appearance and whom they represent.

14 MS. McCAWLEY: Yes. I'm Sigrid McCawley,
15 with the law firm of Boise Schiller & Flexner,
16 and I represent [REDACTED]. And I have
17 here two colleagues of mine, Meredith [REDACTED]
18 and Sandra Perkins, from my firm as well.

19 MS. MENNINGER: Hi. I'm Laura Menninger
20 from Haddon [REDACTED] & [REDACTED], and I represent
21 Ghislaine Maxwell.

22 MR. LOUIS: I'm Dore Louis from Sinclair
23 Louis & Zavertnik. I'm here on behalf of the
24 deponent.

25 Thereupon:

1 [REDACTED]
2 a witness named in the notice heretofore filed,
3 being of lawful age and having been first duly
4 sworn, testified on her oath as follows:

5 E X A M I N A T I O N

6 BY MS. McCAWLEY:

7 Q. Good morning, Johanna. Thank you for
8 coming. I'm going to talk to you a little bit about
9 the deposition process before we get started to make
10 sure you understand what's going to happen here
11 today.

12 You just heard there's a videographer, and
13 he's going to be taking your video during this
14 deposition and generally what's happening in the
15 course of the deposition.

16 And then you have a court reporter here
17 who takes down the words that we say. And it's a
18 little bit tricky because I tend to speak quickly
19 sometimes and speak over people, and she needs to
20 get down all of the words. So I'll try to do my
21 best to go slower and make sure I'm not talking over
22 you.

23 And, similarly, if you've got an answer to
24 a question, make sure that you're verbally
25 responding, not just nodding or making a gesture

1 because she can't get that down. We want to make
2 sure our responses are verbal. I'll try to remind
3 you of that if that happens.

4 Have you ever been deposed before?

5 A. No.

6 Q. No. Okay.

7 So what's going to happen is I'm going to
8 ask questions, and you'll give answers. And like I
9 said, everybody will be recording those.

10 Is there any reason, any medical reason,
11 anything you've taken today that would cause you to
12 not to be able to give truthful testimony today?

13 A. No.

14 Q. No. Okay.

15 All right. So we're going to get started,
16 and if you have any questions during the deposition
17 or you need to stop to take a break, you can just
18 let me know and we'll take that break.

19 So what I -- the only thing I ask is if
20 we're in the midst of a question, you finish the
21 answer before we take a break.

22 A. Sure.

23 Q. But I'll try to make sure that I take
24 regular breaks, as well.

25 You stated your name for the record. Can

1 you tell me your date of birth?

2

3 Q. That makes you how old now?

4

5 Q. Okay. And where are you currently living?

6

7 Q. And I'm going to show you what I'm going
8 to mark as the first two exhibits in the matter.
9 And I'm going to ask the court reporter if I can
10 mark those.

11 (The referred-to document was marked by
12 the court reporter for Identification as
13 [REDACTED] Exhibits 1 and 2.)

14 BY MS. McCAWLEY:

15 Q. Okay. I'm going to show you what I'm
16 marking as Exhibit 1. It's going to be the
17 re-notice of your videotaped deposition, which is
18 simply a notice I'm going to show you. And then
19 Exhibit 2 is the subpoena that we served on you.

20 So you're here today pursuant to our
21 Notice of Deposition and the subpoena that we served
22 on you.

23 Are you familiar with the subpoena? Have
24 you seen that document before?

25 A. Yes.

1 Q. Okay. Great.

2 All right. Do you know a female by the
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to
13 find someone that would come and work at her house.
14 She wanted to know if there was, like, a bulletin
15 board or something that she could post, that she was
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you
19 know, to put up a listing. And then she asked me if
20 I knew anyone that would be interested in working
21 for her.

22 Q. Did she describe what that work was going
23 to be?

24 A. She explained that she lived in Palm Beach
25 and didn't want butlers because they're too stuffy.

1 And so she just liked to hire girls to work at the
2 house, answer phones, get drinks, do the job a
3 [REDACTED] would do.

4 Q. And did she tell you what she would pay
5 for that kind of a job?

6 A. At that moment, no, but later in the day,
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell
11 when you met her?

12 A. There was another woman with her. I don't
13 recall her or what she looks like or how old she
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be
17 interested in working for her. And she told me that
18 she was -- I could trust her and that I could jump
19 in her car and go check out the house at that moment
20 if I wanted.

21 And so I said, Sure, let's do it, and went
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

1 her home?

2 A. She described it as being her home and
3 alluded to the fact that it was her and Jeffrey's
4 home and that she had homes all over the world.
5 Yes.

6 Q. And what happened when you arrived at the
7 home?

8 A. I believe she just showed me around.

9 Q. Do you recall meeting anybody at the home?

10 A. I don't recall if I met Jeffrey at that
11 time or the next time that I was there.

12 Q. How did you meet Jeffrey? Did Maxwell
13 introduce you to Jeffrey?

14 A. Yes.

15 Q. What do you recall of your first meeting
16 with Jeffrey?

17 A. I remember him being in a bathrobe. I
18 recall talking to him about how I was a major in
19 psychology. And he had studied psychology, and so
20 he spoke with me about different topics.

21 I remember thinking this guy is very
22 smart. That was my first impression.

23 Q. And when you refer to Jeffrey, are you
24 referring to Jeffrey Epstein?

25 A. Yes.

1 Q. How did the meeting -- you said Maxwell
2 took you to the home. Do you remember how that
3 meeting ended?

4 A. Well, she dropped me back off at campus.

5 Q. And did you --

6 A. She got my number and I took her number.
7 And then she called me the next weekend to work.

8 Q. So at that point you started working for
9 Ms. Maxwell?

10 A. At that time, yes.

11 MS. MENNINGER: Objection, leading.

12 Sorry.

13 BY MS. McCAWLEY:

14 Q. Did you then start working for Ms. Maxwell
15 after that first meeting?

16 A. She called me and I went over to the home
17 the next Sunday to work.

18 Q. And what work -- can you describe for me
19 the first day at work, what work you performed?

20 A. Sure. I remember answering the phones and
21 taking messages. And at one point, she asked me to
22 go pick up printer ink, and I took her car to Office
23 Depot to get ink.

24 She asked me to go buy some magazines, so
25 I went to Palm Beach Daily News and bought a few

1 magazines.

2 She and I went -- she wanted to take me
3 shopping to Worth Avenue, but it was a Sunday and
4 Nieman Marcus was closed, so we went back to, like,
5 a little book store. And I remember she bought, I
6 think, five pairs of reading glasses because she
7 thought Jeffrey would like them. He had them all
8 over the house. On every table there was reading
9 glasses.

10 And that's about it. It was a pretty
11 simple day.

12 Q. Were you paid that day for that work?

13 A. Yes.

14 Q. And how much were you paid? Do you
15 remember?

16 A. I don't remember how many hours I was
17 there -- I was there. She paid me cash.

18 Q. So Maxwell paid you?

19 A. Yes.

20 Q. And then was she the one who trained you
21 with what -- with respect to what you were supposed
22 to do during the day, directed you to, like you
23 said, go to --

24 A. I believe she was the one that was kind of
25 showing me around.

1 Q. And how long did you work in that position
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she
7 asked me if I wanted to come over and make \$100 an
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she
20 took me up to Jeffrey's bathroom and he was present.
21 And her and I both massaged Jeffrey. She was
22 showing me how to massage.

23 And then she -- he took -- he got off the
24 table, she got on the table. She took off her
25 clothes, got on the table, and then he was showing

1 me moves that he liked. And then I took my clothes
2 off. They asked me to get on the table so I could
3 feel it. Then they both massaged me.

4 Q. So it was more than a foot massage at that
5 point?

6 A. Yeah, it was mostly, like, legs and back.

7 Q. Was everybody in the room without clothes
8 on?

9 A. When they were on the massage table, yes.

10 Q. Did they -- when they got off the massage
11 table to perform the massage, did they dress or
12 did --

13 A. Yes.

14 Q. They dressed.

15 And do you recall who paid you for that
16 first day that you did the massages?

17 A. I don't recall.

18 Q. Do you recall whether Maxwell was at the
19 house during that first day when you were doing the
20 massage with Emmy and Jeffrey?

21 MS. MENNINGER: Objection, asked and
22 answered.

23 BY MS. McCAWLEY:

24 Q. You can answer.

25 A. I don't recall.

1 Q. Who did Emmy work for?

2 A. Ghislaine.

3 Q. Did Maxwell ever refer to Emmy by any
4 particular term?

5 A. She called her her slave.

6 Q. You said your job duties changed. Did you
7 start to travel as part of your job with Jeffrey and
8 Ghislaine?

9 A. Yes. The next time they called me, they
10 asked me to go to New York.

11 Q. And did you -- do you recall when that was
12 approximately?

13 A. That was Easter of 2001.

14 Q. And do you recall who was on the plane
15 with you for that trip?

16 MS. MENNINGER: Objection, leading, form.

17 MS. McCAWLEY: Actually, I'm going to stop
18 really quickly and I'm going to ask for the
19 next exhibit, please.

20 MS. MENNINGER: This is 3?

21 MS. McCAWLEY: Yes. I'm going to mark
22 this as Exhibit 3 for purposes of the
23 deposition.

24

25

1 (The referred-to document was marked by
2 the court reporter for Identification as
3 [REDACTED] Exhibit 3.)

4 BY MS. McCAWLEY:

5 Q. Johanna, I'm going to direct you -- I
6 flagged some pages, but for the record, I'm going to
7 say what pages they are before I hand you the
8 exhibit.

9 A. Sure.

10 Q. These are [REDACTED] 000748 and 000758, are
11 the two pages right now I may refer you to. The
12 document itself is 000721 through 789.

13 And these are flight logs from pilot David
14 Rogers that have been produced in this case.

15 MS. MENNINGER: Objection, foundation,
16 asking the witness any questions about this
17 document.

18 THE WITNESS: Can I touch it?

19 MS. McCAWLEY: Yes, you [REDACTED]

20 [REDACTED]. MENNINGER: I just have to say things
21 every now and then.

22 THE WITNESS: Okay.

23 BY MS. McCAWLEY:

24 Q. So you mentioned that you traveled to New
25 York. If you turn to page -- flagged page which

1 should be 000748, at the top of that document you're
2 going to see a date of April 2001.

3 I'm just going to ask you to go down to
4 the -- if you look at the line on the left to where
5 it says 9 for the date, and look over where it has
6 the names.

7 Do you see -- can you identify your name
8 on that list?

9 A. Yes.

10 Q. And can you tell me -- I know there are
11 initials there -- who else to the extent you
12 remember was on the plane with you?

13 MS. MENNINGER: Objection, foundation,
14 leading, form of question.

15 BY MS. McCAWLEY:

16 Q. Johanna, do you recall who was on the
17 plane with you that day?

18 MS. MENNINGER: Objection, foundation,
19 form, leading.

20 The witness is reading the document.

21 BY MS. McCAWLEY:

22 Q. You can answer.

23 A. Okay. JE, Jeffrey Epstein; ET, Emmy
24 Taylor; VR, [REDACTED]; BK, I do not recall;
25 and myself.

1 MS. MENNINGER: Objection. The witness is
2 reading the document.

3 BY MS. McCAWLEY:

4 Q. And do you recall where you flew when you
5 went to -- when you traveled that first time with
6 Jeffrey Epstein?

7 A. We left from Palm Beach and landed in
8 Atlantic City for a few hours because there was a
9 storm in New York, and then got back on the plane a
10 few hours later and landed in Teterboro.

11 Q. And you said that you recall landing in
12 Atlantic City. Did you go into Atlantic City?

13 A. Yes, went to one of Trump's casinos.

14 Q. Did you actually go into the casino
15 itself?

16 A. Yes.

17 Q. Do you recall Virginia -- at the time
18 [REDACTED] being present with you?

19 A. Yes.

20 Q. Do you recall if she went into the casino?

21 A. She was underage. I did not know anything
22 about how old you had to be to gamble legally. I
23 just knew she could not get in because of an ID
24 issue. So she and I did not gamble.

25 Q. In your opinion, did Virginia look young,

1 in your view?

2 A. Yes.

3 Q. Did you ever -- did you at that time
4 wonder why she was traveling with Jeffrey?

5 A. At that time, I did not.

6 Q. Did you later wonder that?

7 A. Yes.

8 Q. And what was your impression?

9 MS. MENNINGER: Objection, vague,
10 speculative.

11 THE WITNESS: I -- we're jumping ahead; is
12 that okay?

13 BY MS. McCAWLEY:

14 Q. Yes, that's okay.

15 A. A few days later, I remember asking her
16 questions to try to figure out her role, why she was
17 there, and she gave me vague answers and was never
18 specific.

19 And so I thought perhaps she just was an
20 assistant, someone that did massages well. I wanted
21 to believe that she was innocent.

22 Q. Did you ever refer to her as being
23 orphan-like?

24 A. I did.

25 Q. And how did that come about?

1 A. No, I only -- to you, I said that to you.
2 I just saw her as perhaps someone who may not have
3 had a strong family, and they took her under their
4 wing.

5 Q. Now, you mentioned remembering going to
6 Atlantic City.

7 Did you go -- where did you go after
8 Atlantic City?

9 A. Once we landed in New York, Emmy and I
10 went in a car and drove around the city for a half
11 hour or so, just to see some of the city.

12 Q. And then where did you go after doing the
13 sightseeing?

14 A. We went to the townhouse on East 71st.

15 Q. And can you describe that location for me?

16 A. Sure. Between Madison and Park. I think
17 the address might have been 9 East 71st Street.

18 Q. And who owned that home?

19 A. As far as I knew, Epstein.

20 Q. Can you describe for me physically what --

21 A. Palatial. When you walk up, it looks like
22 a normal door to a townhouse, and when you walk
23 in -- I thought there were four floors. I heard
24 there were seven floors. I didn't see them all.

25 Q. And do you recall who, if anybody, was at

1 Jeffrey's home when you arrived?

2 A. Yes. When I first walked in the door, it
3 was just myself, and Ghislaine headed for the
4 staircase and said -- told me to come up to the
5 living room.

6 Q. And what happened at that point, when you
7 came up to the living room?

8 A. I came up and saw Virginia, Jeffrey,
9 Prince Andrew, Ghislaine in the room.

10 Q. And did you meet Prince Andrew at that
11 time?

12 A. Yes.

13 Q. And what happened next?

14 A. At one point, Ghislaine told me to come
15 upstairs, and we went into a closet and pulled out
16 the puppet, the caricature of Prince Andrew, and
17 brought it down. And there was a little tag on the
18 puppet that said "Prince Andrew" on it, and that's
19 when I knew who he was.

20 Q. And did -- what did the puppet look like?

21 A. It looked like him. And she brought it
22 down and presented it to him; and that was a great
23 joke, because apparently it was a production from a
24 show on BBC. And they decided to take a picture
25 with it, in which Virginia and Andrew sat on a

1 [REDACTED]. They put the puppet on Virginia's lap, and I
2 sat on Andrew's lap, and they put the puppet's hand
3 on Virginia's breast, and Andrew put his hand on my
4 breast, and they took a photo.

5 Q. Do you remember who took the photo?

6 A. I don't recall.

7 Q. Did you ever see the photo after it was
8 taken?

9 A. I did not.

10 Q. And Ms. Maxwell was present during the --
11 was Ms. Maxwell present during that?

12 A. Yes.

13 Q. What happened next?

14 A. The next thing I remember is just being
15 shown to which room I was going to be staying in.

16 Q. When you exited the room that you were in
17 where the picture was taken, do you recall who
18 remained in that room?

19 A. I don't.

20 Q. Do you recall seeing Virginia exit that
21 room?

22 A. I don't.

23 Q. During this trip to New York, did you have
24 to perform any work when you were at the New York
25 house?

1 A. I performed at least one massage that I
2 recall.

3 Q. And who instructed you to give that
4 massage?

5 A. Jeffrey.

6 Q. And can you describe for me what happened
7 during that massage?

8 A. Near the end, he asked me to rub his
9 nipples while he masturbated.

10 Q. And did that take place?

11 A. It did not.

12 Q. And why not?

13 A. I was not comfortable with it. And so I
14 left the room.

15 Q. Did you have any -- did you say anything
16 to him before leaving the room?

17 A. I believe I said, "I'm done."

18 Q. Do you recall what his reaction was to
19 that?

20 A. I do not. At the time, at that moment, I
21 do not.

22 Q. Did you recall later what --

23 A. Well, we had a conversation a little
24 later, talking about his expectations, and that was
25 the conversation where he said that the next trip

1 they were going on was to the island in the Virgin
2 Islands, and I would be invited; however, there
3 would be, quote, sex stuff happening.

4 Q. Can you describe for me -- can you
5 describe for me what that -- in New York, where you
6 massaged and what that looked like?

7 A. He had one room that was the massage room.
8 It was about the size of a spa room in a spa. It
9 had high ceilings. It had dark tapestry on the
10 walls. It was a very dark room. There was a very
11 large picture of a naked woman whom I don't recall.
12 That's all I remember.

13 Q. In the New York home, did you observe
14 photos around the house?

15 A. I don't recall.

16 Q. In the Palm Beach home that we were
17 talking about earlier, did you recall seeing photos
18 in that?

19 A. Yes.

20 Q. And did you recall seeing photos of naked
21 females in that home?

22 A. Yes.

23 Q. Approximately -- can you tell me where you
24 would see those in the home?

25 A. I definitely saw them in his bathroom.

1 And I can't recall if they were in the main living
2 areas.

3 Q. Did you see them in the stairwell up to
4 the second story of the house?

5 A. I can't recall.

6 Q. Do you know who -- who the people were in
7 those photos? Were you familiar with any of them?

8 A. No.

9 Q. Were you in any of those photos?

10 A. At one point, yes.

11 Q. And were you naked in that photo?

12 A. Topless.

13 Q. Do you recall seeing any naked photos of
14 [REDACTED]?

15 A. I do not.

16 Q. Where did you go next, after the New York
17 visit?

18 A. I went to the Virgin Islands.

19 Q. And who told you that you would be going
20 to the Virgin Islands?

21 A. He asked me if I wanted to go, and I said
22 I would still like to go.

23 Q. And do you recall who you -- who went with
24 you to the Virgin Islands?

25 A. I believe -- well, I know Virginia was

1 with me. Ghislaine was there. Jeffrey. And there
2 were two other women that I don't recall their
3 names.

4 Q. Did you travel on Jeffrey's plane to get
5 to the Virgin Islands?

6 A. Yes.

7 Q. I want to show you again the flight log
8 that you have there in front of you. If you can
9 flip to --

10 MS. MENNINGER: I'm going to object to the
11 foundation again.

12 BY MS. McCAWLEY:

13 Q. It's that same page that you were on. The
14 date is the 11th.

15 A. Yes.

16 Q. Do you see the TEB to TIST there?

17 A. Yes.

18 MS. MENNINGER: Objection, leading. The
19 questioning is testifying now.

20 MS. McCAWLEY: Can you let me finish my
21 question, please?

22 BY MS. McCAWLEY:

23 Q. Can you tell me who the initials are there
24 that you see that were on the plane?

25 MS. MENNINGER: Objection, foundation,

1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine
3 Maxwell; AP and PK are the two women I do not
4 recall; [REDACTED]; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than
17 one?

18 A. Yes. I massaged Ghislaine at one point.
19 And I massaged Jeffrey, Virginia and I, both, on the
20 beach.

21 Q. Were you dressed during the massage that
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

1 as well.

2 Q. Were you paid for the massage on the beach
3 with Virginia?

4 A. At the end of -- before I left and flew
5 home, Ghislaine gave me \$1,000.

6 Q. You mentioned that you massaged -- you
7 recall massaging Ghislaine on the trip to the USVI.

8 Do you recall when that took place?

9 A. I don't even recall what days we were
10 there, so...

11 Q. Do you recall where it took place?

12 A. I believe it was -- well, either in my
13 guest cottage or one of them. There were three
14 guest houses set up that were all similar and that I
15 was staying in. Virginia and I stayed in one
16 together. And it was either in there or in another
17 one that was identical.

18 Q. And was that massage performed with
19 Virginia as well or by you alone?

20 A. I don't recall.

21 Q. Were there other females in the USVI on
22 that trip with you besides Virginia?

23 A. Two others.

24 Q. And do you recall who they were?

25 A. I do not.

1 Q. Did you ever see Ghislaine Maxwell during
2 that trip laying out by the pool?

3 A. There was one time where we were all by
4 the pool, yes.

5 Q. Was Ghislaine Maxwell ever nude or topless
6 by the pool?

7 A. I don't recall. She was nude when she
8 went swimming in the ocean.

9 Q. At that moment in the USVI home, did you
10 observe any photos there of nude females?

11 A. I don't recall.

12 Q. Besides Virginia, who you mentioned, you
13 observed to be young, did you observe any other
14 females that in your view appeared to be essentially
15 under the age of 18?

16 A. No.

17 Q. Did you observe any females who you
18 thought looked young, younger than you?

19 A. No.

20 Q. Do you remember an individual by the name
21 of that you met during your time with Jeffrey
22 Epstein?

23 A. In Palm Beach?

24 Q. Yes.

25 A. Yes.

1 Q. Did you observe her to be young when you
2 met her?

3 MS. MENNINGER: Objection, vague as to
4 time.

5 THE WITNESS: All of the women were
6 generally young. I did not know the ages of
7 really anyone, so...

8 BY MS. McCAWLEY:

9 Q. How many massages did Jeffrey receive on
10 average in a given day?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Three a day.

13 BY MS. McCAWLEY:

14 Q. Let me back up for a moment.

15 How long did you work for Jeffrey and
16 Ghislaine?

17 MS. MENNINGER: Objection, leading and
18 foundation.

19 THE WITNESS: I believe it was five years,
20 2001 to 2006.

21 BY MS. McCAWLEY:

22 Q. And how many massages did Epstein receive
23 per day on average?

24 MS. MENNINGER: Objection, foundation.

25 THE WITNESS: Three.

1 BY MS. McCAWLEY:

2 Q. Were the massages performed by the same
3 girl or different females?

4 A. Different.

5 MS. MENNINGER: Objection, foundation.

6 BY MS. McCAWLEY:

7 Q. What did the females who performed the
8 massages look like?

9 MS. MENNINGER: Objection, foundation.

10 THE WITNESS: They all looked different.

11 Some of them were ethnic, some were blond, some
12 were short, some were tall. Everyone was thin.

13 BY MS. McCAWLEY:

14 Q. Were the girls who performed the massages
15 young or old?

16 MS. MENNINGER: Objection, foundation.

17 THE WITNESS: I don't recall anyone being
18 old.

19 BY MS. McCAWLEY:

20 Q. Do you recall anybody being over the age
21 of, say, 25?

22 MS. MENNINGER: Objection, form.

23 THE WITNESS: Yeah, I believe there was
24 probably a few women that were older than 25.

25 MS. MENNINGER: I'm sorry. I get a chance

1 to object and then you can still answer. No
2 one is going to stop you from answering. I
3 just need to get the objection on the record,
4 in the same way she needs to be able to talk
5 before you. My apologies. I'm not trying to
6 cut you off, but I am supposed to get it in
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,
15 he needed to have three orgasms a day. It was
16 biological, like eating.

17 Q. And what was your reaction to that
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when
21 you observed the other females giving massages, do
22 you recall what they would dress like? Did they
23 wear scrubs or did they typically wear normal
24 clothes?

25 A. Normal clothes.

1 MS. MENNINGER: Objection, leading.

2 BY MS. McCAWLEY:

3 Q. Do you believe that from your
4 observations, Maxwell and Epstein were boyfriend and
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. McCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would
15 not be able to please him as much as he needed and
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. McCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there
9 were expectations of me to get the camera until
10 after. She had purchased the camera for me,
11 and I was over there giving Jeffrey a massage.
12 I did not know that she was in possession of
13 the camera until later.

14 She told me -- called me after I had left
15 and said, I have the camera for you, but you
16 cannot receive it yet because you came here and
17 didn't finish your job and I had to finish it
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her
21 to mean?

22 A. She was implying that I did not get
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a
10 girl's virginity?

11 A. He did not tell me. He told a friend of
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,
15 foundation.

16 THE WITNESS: He wanted to have a friend
17 of mine come out who was cardio-kickboxer
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,
20 and he told my friend Rachel that -- he said,
21 You see that girl over there laying by the
22 pool? She was 19. And he said, I just took
23 her virginity. And my friend Rachel was
24 mortified.

25

1 BY MS. McCAWLEY:

2 Q. Based on what you knew, did Maxwell know
3 that the type of massages Jeffrey was getting
4 typically involved sexual acts?

5 MS. MENNINGER: Objection, foundation,
6 leading.

7 THE WITNESS: Yes.

8 BY MS. McCAWLEY:

9 Q. What was Maxwell's main job with respect
10 to Jeffrey?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Well, beyond companionship,
13 her job, as it related to me, was to find other
14 girls that would perform massages for him and
15 herself.

16 BY MS. McCAWLEY:

17 Q. Did Maxwell ever refer to the girls in a
18 particular way?

19 A. At one point when we were in the islands,
20 we were all watching a movie and she called us her
21 children.

22 Q. Did anybody respond to that?

23 A. I don't recall.

24 Q. Did she ever refer to herself as a mother?

25 A. Yes, like a mother hen.

1 Q. Do you recall who was present at the time
2 that she made that comment about children?

3 A. This was the second trip that I took to
4 the Virgin Islands, so, no. I don't want to speak,
5 you know, incorrectly. I can't remember. I can't
6 really remember.

7 Q. Have you ever met David Copperfield?

8 A. Yes.

9 Q. And do you recall when you initially met
10 him?

11 A. Yes.

12 Q. Can you tell me what that was?

13 A. Sure. Someone called me from the house
14 and said that he would be there, and if I wanted to
15 come have dinner, then I could meet him.

16 So when I arrived at the house, he wasn't
17 there yet, but I waited with, I believe, [REDACTED]
18 [REDACTED], and there was another girl there which I had
19 never met and never seen. She seemed young to me.

20 And I asked her what school she went to,
21 kind of prodding to see if she went to one of the
22 area colleges, and I did not recognize the name of
23 the school.

24 And so I thought she could be younger than
25 college age, but I had to assume for my own sanity

1 that she was a daughter of one of his friends.

2 Q. But it was possible she was the school --
3 is it possible that the school she referred to was a
4 high school?

5 A. Yes.

6 Q. And what happened at that dinner, if
7 anything?

8 A. He did some magic tricks.

9 Q. Did you observe David Copperfield to be a
10 friend of Jeffrey Epstein's?

11 A. Yes.

12 Q. Did Copperfield ever discuss Jeffrey's
13 involvement with young girls with you?

14 A. He questioned me if I was aware that girls
15 were getting paid to find other girls.

16 Q. Did he tell you any of the specifics of
17 that?

18 A. No.

19 Q. Did he say whether they were teenagers or
20 anything along those lines?

21 A. He did not.

22 MS. MENNINGER: Objection, leading, calls
23 for hearsay.

24 BY MS. McCAWLEY:

25 Q. Did you ever hear or observe Jeffrey

1 talking on the phone about Frederic Fekkai?

2 A. Yes.

3 MS. MENNINGER: Objection, leading.

4 BY MS. McCAWLEY:

5 Q. What did you hear?

6 A. I heard him call someone, and say, Fekkai
7 is in Hawaii. Can we find some girls for him?

8 Q. And what was your reaction to that?

9 A. Well, I was massaging and I didn't have a
10 reaction. I tried to remain reactionless the whole
11 five years.

12 Q. Did Jeffrey ever take you shopping?

13 A. Yes.

14 Q. Can you describe for me what happened?

15 A. Sure. He took me to Victoria's Secret. I
16 believe he picked out everything and went into the
17 room with me, the fitting room, which was very odd.

18 Q. Did he make any comments about being in
19 the fitting room with you?

20 A. He joked that one time he was in there
21 with another girl, and she said something like
22 "Dad." But that's all I recall.

23 Q. Did Jeffrey ever talk to you -- let me
24 back up a moment.

25 Have you ever been propositioned by anyone

1 to have a baby for someone?

2 A. Yes.

3 Q. And who propositioned you?

4 A. Jeffrey asked me.

5 Q. Did he ask you more than once?

6 A. Yes.

7 Q. And what did he say?

8 A. Basically just said, I want you to be the
9 mother of my baby.

10 Q. And do you recall your response to that?

11 A. Um, I don't believe that I said flat-out
12 no. I didn't agree to it. I would just say, ■,
13 yeah, really? Okay.

14 Q. Did you ever bring other girls over as
15 Maxwell had requested?

16 MS. MENNINGER: Objection, leading,
17 hearsay, form.

18 THE WITNESS: One time.

19 BY MS. McCAWLEY:

20 Q. Let me back up a minute, just to make it a
21 clean question.

22 Did you ever bring friends over to massage
23 Jeffrey?

24 A. No.

25 Q. And why did you not bring friends over to

1 message Jeffrey?

2 A. I was living in secret about what I was
3 doing during the massages, and I did not want my
4 friends to be -- to know what I was doing. So I did
5 not want anyone else coming into that.

6 Q. Was Bill Clinton a friend of Jeffrey
7 Epstein?

8 MS. MENNINGER: Objection, foundation.

9 BY MS. McCAWLEY:

10 Q. Let me back up.

11 Do you know if Bill Clinton was a friend
12 of Jeffrey Epstein?

13 A. I knew he had dealings with Bill Clinton.
14 I did not know they were friends until I read the
15 Vanity Fair article about them going to Africa
16 together.

17 Q. Did Jeffrey ever talk to you about Bill
18 Clinton?

19 A. He said one time that Clinton likes them
20 young, referring to girls.

21 Q. Did you ever -- do you recall ever taking
22 a trip to Jeffrey Epstein's home in New Mexico?

23 A. Yes.

24 Q. And do you recall who you went on that
25 trip with?

1 A. [REDACTED] was there. Ghislaine was
2 there. That's all I recall.

3 Q. Do you recall why you went on the trip to
4 New Mexico?

5 A. To work.

6 Q. Did you perform massages on that trip?

7 A. Yes.

8 Q. Did you -- do you recall whether you
9 performed massages with [REDACTED] on that trip?

10 A. No.

11 Q. Do you recall in the New Mexico home ever
12 observing nude photos of females there?

13 A. I don't recall.

14 Q. When you would provide massages, would you
15 provide those massages naked?

16 A. On occasion.

17 Q. On average, would you be naked, if it was
18 100 percent of the time, more than 50 percent of the
19 time?

20 A. Can you repeat it?

21 Q. Sure. When you're performing the
22 massages, can you tell me -- you said on occasion.
23 Over the five years that you worked for him, how
24 often did you perform massages naked?

25 A. Somewhere between 25 and 50 percent of the

1 time.

2 Q. Did Epstein try to make the massages
3 sexual?

4 A. On occasion.

5 Q. Would Epstein have you rub his nipples?

6 A. Yes.

7 Q. Would he masturbate during the massages?

8 A. Yes.

9 Q. Did he use sex toys or vibrators on you?

10 A. Yes.

11 Q. Would he leave the sex toys or vibrators
12 out after the massage or would he clean up after
13 himself?

14 MS. MENNINGER: Objection, vague, form.

15 THE WITNESS: He did not ever clean up.

16 BY MS. McCAWLEY:

17 Q. Do you believe that your experience during
18 the years you were with Jeffrey and Maxwell damaged
19 you?

20 MS. MENNINGER: Objection, leading, form.

21 THE WITNESS: It affected me. "Damaged"
22 is a strong word.

23 BY MS. McCAWLEY:

24 Q. And in what way did it affect you?

25 A. It affected future relationships with men,

1 trust issues, expectation issues.

2 Q. Did you observe [REDACTED] and
3 Ghislaine at the house at the same time?

4 MS. MENNINGER: Objection, leading, form.

5 THE WITNESS: I don't recall.

6 BY MS. McCAWLEY:

7 Q. On the USVI trip, the second trip that you
8 took, do you recall [REDACTED] being present?

9 A. I believe she was present at that trip.

10 Q. Do you recall Maxwell being present on
11 that trip?

12 A. Yes.

13 Q. Do you know an individual by the name of
14 ?

15 A. Yes.

16 Q. And who is ?

17 A. She was one of the girls that was around.

18 Q. Was [REDACTED] around both Jeffrey Epstein
19 and Ghislaine Maxwell?

20 A. I don't recall.

21 Q. Do you recall where you first met
22

23 A. In Palm Beach.

24 Q. At Jeffrey Epstein's home?

25 A. Yes.

1 Q. And what -- do you recall any observations
2 about when you met her?

3 A. To speak with, she was a little rough
4 around the edges, and I could see the progression of
5 her being groomed a little. They got her braces.
6 She had terrible posture. And with a lot of
7 massages, she learned to stand up straight. So I
8 just saw her become a much more confident person.

9 Q. Do you recall how old she was when you
10 first met her?

11 A. I assumed she was 18, but I do not know
12 her age.

13 MS. McCAWLEY: We're going to take a break
14 really quickly and then we will be back. So we
15 are going to go off the record.

16 THE VIDEOGRAPHER: Off the record at 9:48.

17 (Thereupon, a recess was taken, after
18 which the following proceedings were held:)

19 THE VIDEOGRAPHER: On the record at 9:58.

20 BY MS. McCAWLEY:

21 Q. I'm just going to resume. I have a few
22 more questions for you.

23 You mentioned visiting the US Virgin
24 Islands.

25 Do you recall doing any activities with

1 Maxwell when you were on the visit to the USVI?

2 MS. MENNINGER: Objection, vague as to
3 time.

4 THE WITNESS: I don't recall.

5 BY MS. McCAWLEY:

6 Q. Do you recall ever going hiking with her?

7 A. Yes.

8 Q. Did Maxwell ever ask you to try to bring
9 other girls over for Jeffrey?

10 A. At that time?

11 Q. Yes.

12 A. No.

13 Q. Any other time?

14 A. Well, she had asked me if I knew anyone
15 that could perform massages that would come to the
16 house.

17 Q. And what was your understanding of that
18 request?

19 MS. MENNINGER: Objection.

20 THE WITNESS: Well --

21 MS. MENNINGER: Form.

22 THE WITNESS: -- I just wondered why they
23 wouldn't just call me.

24 BY MS. McCAWLEY:

25 Q. And did you bring anybody else over to

1 perform massages?

2 A. I did not.

3 Q. When you were either in the USVI or in
4 Palm Beach, did you ever observe any females either
5 topless or naked out by the pool?

6 A. Yes.

7 Q. What did you observe?

8 A. Mostly skinny-dipping.

9 Q. Do you know who the individuals were that
10 you observed?

11 A. [REDACTED] and Ghislaine.

12 Q. Anybody else?

13 A. Yes, but I don't recall who.

14 Q. Did that happen on more than one occasion?

15 A. Yes.

16 Q. How often do you remember making those
17 observations?

18 A. Three times.

19 Q. Do you recall giving a statement to the
20 police regarding Jeffrey Epstein?

21 A. Yes.

22 Q. Do you recall when you gave that
23 statement?

24 A. I don't recall the date.

25 Q. Do you recall the year?

1 A. I want to say it was early 2006 or late
2 2005.

3 Q. Do you recall who you met with?

4 A. No.

5 Q. Do you recall what you told the police?

6 A. It was similar to this. They were asking
7 me a lot of questions that I answered. They knew a
8 lot. They knew what the bathroom looked like. They
9 knew that the [REDACTED] had a hot pink throw on it with
10 [REDACTED] tassels.

11 I assumed that there had been videos and
12 they had seen me. They had seen the videos. That's
13 what I had assumed. I didn't know that maybe people
14 had already come forward and given them statements.

15 Q. Did they talk to you at all about the
16 videos?

17 A. They said, Were you aware that there were
18 video cameras in the house?

19 I said, No, but it would not surprise me.

20 MS. McCAWLEY: And I'm going to mark as
21 Exhibit 4 -- do you have an extra -- sorry.
22 Did you get one? Okay. [REDACTED] 0002 through
23 89.

24 And I'm going to direct you to page 00076,
25 and I'm going to hand it to you.

1 (The referred-to document was marked by
2 the court reporter for Identification as
3 [REDACTED] Exhibit 4.)

4 BY MS. McCAWLEY:

5 Q. I'm just going to ask that you take a look
6 at that. As you can see, under the narrative line
7 there, there is a name. It says, "Reported by
8 Recarey, [REDACTED]." Is that a name you recall meeting
9 with, a Detective Recarey?

10 A. Yes. I mean, I don't recall his name,
11 only except that he had been following me around,
12 and he left me cards, like, on my car and in my
13 door. I tried to avoid him for a long time.

14 Q. And can you just look at the text
15 underneath there?

16 A. Uh-huh.

17 Q. Take a moment to look at that.

18 A. Sure.

19 Q. Does that refresh your recollection as to
20 what you told the police during the investigation?

21 A. There are errors in here. I was not 23
22 when I met him. I was 21.

23 Q. Anything else that doesn't look correct?

24 A. The same error: That I had met him three
25 years ago, and it obviously had been closer to five.

1 There is also the error, he obviously
2 misunderstood me: He did not pay for my tuition at
3 college. I'm still paying those school loans. But
4 he did pay for me to go to massage school and to
5 cosmetology school.

6 Okay. It pretty much ends here.

7 Q. Yes. Right. About halfway through the
8 page.

9 A. Okay.

10 MS. McCAWLEY: So, Johanna, that concludes
11 my initial piece. I'm going to reserve the
12 rest of my time for redirect. I'm going to
13 turn it over to Laura.

14 MS. MENNINGER: Can we take just a little
15 break?

16 MS. McCAWLEY: Sure, no problem.

17 THE VIDEOGRAPHER: Off the record at
18 10:05.

19 (Thereupon, a recess was taken, after
20 which the following proceedings were held:)

21 THE VIDEOGRAPHER: On the record at 10:14.

22 E X A M I N A T I O N

23 BY MS. MENNINGER:

24 Q. Hi.

25 A. Hello.

1 Q. We've never met before today, correct?

2 A. Correct.

3 Q. Can you tell me a little bit about your
4 current job?

5 A. Sure. I just purchased a salon. I'm a
6 salon owner. I'm a hairstylist.

7 Q. Congratulations.

8 A. Thank you.

9 Q. How long have you been a hairstylist?

10 A. For 10 years.

11 Q. And what did you do before that?

12 A. I briefly did massage in a spa for about a
13 year and a half. And before that I was a nanny, and
14 before that I was in school.

15 Q. And I believe you said you studied
16 psychology in school?

17 A. Correct.

18 Q. Did you graduate?

19 A. Yes.

20 Q. With a degree in psychology?

21 A. Yes.

22 Q. Where did you get training to be a massage
23 therapist?

24 A.

1 Q. And when did do you that?

2 A. That would have been, I believe, in

3 Q. And how long did you study there?

4 A. I think it was a six-month program.

5 Q. And you worked in a spa thereafter?

6 A. I did.

7 Q. What was the name of the spa again?

8 A.

9 Q. And are you married?

10 A. No.

11 Q. Do you have children?

12 A. No.

13 Q. And how old are you now?

14 A.

15 Q. Can you tell me about your first meeting
16 with Ghislaine Maxwell?

17 A. Sure. I was sitting on a bench [REDACTED]
18 [REDACTED]. She approached me.

19 I was getting ready to go to a class. It was my
20 junior year. Yes, it was the second semester of my
21 junior year. And she and another woman approached
22 me. The other woman didn't speak that I recall.

23 And she asked me about -- she had a house
24 in Palm Beach, and she was looking for someone that
25 she could hire to work at the house, where she could

1 post that she needed help.

2 She then asked me if I knew anyone, and I
3 didn't know who she was, I didn't want to take the
4 responsibility of finding someone to work for her,
5 and so I said, Sorry, I don't.

6 And then she said, Well, maybe what about
7 you?

8 And I was at a point in life, I was super
9 spontaneous and willing to skip school.

10 So she said, Come to my house, come in my
11 car and check it out.

12 And so I did.

13 Q. Okay. So for those of you -- of us who
14 don't know, is this like a college campus, like a
15 traditional college campus, or is it in a city
16 setting?

17 A. It's in a city setting. I mean, Palm
18 Beach is not a big city. So it's on the
19 Intracoastal, and there was a big grassy area that
20 were surrounded by buildings, so she was inside of
21 the campus.

22 Q. And she was looking for a bulletin board
23 where she could post a job?

24 A. Something like that, yes.

25 Q. Did she have any kind of flyers --

1 A. Not that I recall.

2 Q. But that's what she asked you, for
3 directions to a bulletin board where she could post
4 a job?

5 A. Yes.

6 MS. McCAWLEY: Objection.

7 BY MS. MENNINGER

8 Q. And it sounds like you guys got into a
9 conversation; is that fair?

10 A. Yes.

11 Q. Can you describe Ghislaine Maxwell's
12 personality?

13 A. Well, I instantly picked up on the fact
14 that she was British. She had on, like, workout
15 clothes. I believe she was wearing all black. And
16 she -- I mean, she was a little snarky, but I felt
17 comfortable enough to get in the car with her.

18 Q. And it sounds like you had contact with
19 her over the next several years; is that fair?

20 A. Yes.

21 Q. And did you get to know more about her
22 personality over those five years, four or five
23 years?

24 A. Yes.

25 Q. And can you describe her for me, how you

1 observed her personality to be?

2 A. Sure. She definitely had a great sense of
3 humor, she loved making jokes. I mean, in a very
4 British way. I don't remember her ever laughing,
5 but she was funny.

6 And I remember just thinking, she -- the
7 first weekend that we flew to the Virgin Islands,
8 she flew the helicopter from Saint, wherever we were
9 to little Saint Jeff [sic] or whatever the name of
10 the island was, and I just thought, wow, who is this
11 woman.

12 Q. Would you say that you respected her?

13 A. Yes.

14 Q. When you ended up getting in the car with
15 her and this other woman and going back to the
16 house, who was driving the car?

17 A. She was driving.

18 Q. And where did she take you?

19 A. She took me to the house in Palm Beach.

20 Q. And can you describe the house in Palm
21 Beach?

22 A. Sure. It's at the end of El Brillo Way,
23 on the Intracoastal. The house was either [REDACTED] or
24 pink. It was pink at one time it may have been
25 painted. It was nothing fancy, it was large, it was

1 like a beach house.

2 Q. And when you got there, do you remember
3 meeting other people while you were there that first
4 time?

5 A. I remember other people being in the home.
6 I don't really remember who was there.

7 Q. Do you remember meeting, like, a [REDACTED]
8 or --

9 A. Potentially, a chef. Someone in the
10 kitchen. Maybe a house manager, yeah.

11 Q. What was your impression of this other
12 woman that was with Ms. Maxwell at this time?

13 A. Zero. She left zero impression on me.

14 Q. Age, height, hair color? Nothing?

15 A. I want to say she was brunette. Age, 20s.
16 Yeah.

17 Q. And you were going for the purposes of
18 checking out potentially working at this job?

19 A. Yes.

20 Q. It sounds like you met Jeffrey Epstein
21 that first time that you did go to the house, right?

22 MS. McCAWLEY: Objection.

23 THE WITNESS: I believe I either met him
24 that time or the next time. I can't recall.

25

1 BY MS. MENNINGER:

2 Q. Okay. And tell me about your first
3 meeting with him.

4 A. Sure. I met him, I believe it was in the
5 hallway right beside the kitchen. There was a
6 hallway. It was actually more like a room, a pantry
7 type of room. That's where all of the pieces of
8 paper with the phone messages would lay.

9 And I remember sitting on the counter and
10 speaking with him, and he was in a bathrobe, and he
11 spoke with me about me being in college and studying
12 psychology.

13 Q. And did you form an opinion of him in that
14 first meeting?

15 A. I -- yeah. I believed that he was smart.
16 He was personable and could speak to anyone.

17 Q. Did he give off any sexual vibes in the
18 first meeting?

19 A. No.

20 Q. And where was Ghislaine when you were
21 speaking with Mr. Epstein?

22 A. I don't recall.

23 Q. Do you recall going to a second floor of
24 the home during that first meeting?

25 A. I don't recall. Ghislaine said at one

1 point, You might get a massage today. That was --
2 sorry, that was the second time when I was in the
3 home working. And I just thought it was crazy that
4 I would get a massage while I was working. But it
5 did not end up happening because the masseuse could
6 not stay.

7 Q. Do you know who the masseuse was that
8 could not stay?

9 A. No.

10 Q. But that didn't happen on the first
11 meeting; you believe that was the second meeting?

12 A. Yes, that was when I was there to work.

13 Q. How long -- how did the first trip to the
14 house end?

15 A. She gave me her phone number, and she took
16 my phone number, and she took me back to school.

17 Q. And were you full-time at school at the
18 time?

19 A. Yes.

20 Q. And how many classes were you taking, if
21 you remember?

22 A. Probably four or five.

23 Q. How did you -- how long was it before you
24 heard from Ms. Maxwell again?

25 A. Within probably three days.

1 Q. And how did she contact you?

2 A. She called me on my -- at that time I had
3 a cell phone. It could have been on my cell phone.
4 It could have been on my house phone. We had house
5 phones back then.

6 Q. I remember.

7 Where were you living at the time?

8 A. I was in an apartment in West Palm Beach.

9 Q. And did you have a roommate or with
10 family?

11 A. I had a roommate.

12 Q. So when Ms. Maxwell called you on whatever
13 phone it was, do you remember what she said?

14 A. Yeah. She said, Do you want to come over
15 and work on Sunday?

16 Q. And what did you say?

17 A. I said, Sure.

18 Q. And did you?

19 A. I did.

20 Q. How did you get there?

21 A. That I don't recall, because I did not
22 have a car.

23 Q. Did you --

24 A. I think my roommate dropped me off,
25 honestly. I can remember what I was wearing.

1 Q. You do?

2 A. I do.

3 Q. What were you wearing?

4 A. I had a -- I still have the shirt. It's
5 an old, weathered, blue, North Carolina Tech Tar
6 Heels T-shirt.

7 Q. Because you -- did Ms. Maxwell explain to
8 you what you would be doing on that Sunday when you
9 came to work or was that part of the prior
10 conversation?

11 MS. McCAWLEY: Objection.

12 THE WITNESS: About what I was wearing?

13 BY MS. MENNINGER:

14 Q. No. About what you were going to do at
15 work.

16 A. She had explained that she just wanted
17 someone to help out around the house, answering
18 phones, you know, grabbing drinks if someone wanted
19 a drink, running errands.

20 Q. And so you dressed appropriate to what you
21 believed --

22 A. I did not know how to dress properly,
23 apparently. I should not have worn that. But I was
24 in college.

25 Q. Did anyone say anything to you?

1 A. No.

2 Q. So when you got there, what happened?

3 This is your second time to the house, but your
4 first time working, right?

5 A. Yes.

6 I was probably introduced to a few people
7 that were there. I mean, I was there for several
8 hours. Do I recall every minute? No. I just
9 recall when I would actually have to work, answer
10 the phone, pour some drinks for people. Just water;
11 they didn't drink alcohol. And run errands. There
12 were a few errands that I ran.

13 Q. You described those errands earlier?

14 A. I did. In her car.

15 Q. You used her car?

16 A. Yes.

17 Q. What kind of car was it?

18 A. It was a Mercedes convertible.

19 Q. Did anyone go with you?

20 A. No.

21 Q. You described a shopping trip. Was that
22 in the same car?

23 A. Yes.

24 Q. Was that a separate trip than when you
25 went to run errands?

1 A. Yes. That's when Ghislaine went with me
2 and she drove.

3 Q. Okay. So you ran errands, came back, more
4 than once?

5 A. Twice.

6 Q. And then you went on a shopping trip?

7 A. Yes.

8 Q. During the time you were at the home, was
9 there anything that made you suspicious?

10 A. No.

11 Q. Or leery?

12 A. No.

13 Q. You mentioned there may have been some
14 discussion of a massage. Do you recall that
15 discussion?

16 A. I had never had a massage before. So she
17 just said there was a massage therapist coming and I
18 may get one.

19 Q. Did she say who it was?

20 A. No.

21 Q. So when you went shopping on this trip,
22 you said Ghislaine drove the car and you went with
23 her. Was anyone else there?

24 A. No.

25 Q. And where did you all go?

1 A. We went to Worth Avenue in Palm Beach, but
2 because it was Sunday, the stores were closed.

3 Bless you.

4 MR. LOUIS: Thank you.

5 THE WITNESS: So from there, we went to --
6 I believe it was Palm Beach Daily News, which
7 was like a little book store. And I remember
8 her purchasing reading glasses for Jeffrey and
9 some magazines.

10 BY MS. MENNINGER:

11 Q. Were those things for the home?

12 A. Yes.

13 Q. And earlier on your errands, you had been
14 purchasing things for the home or office?

15 A. Yes. Yes.

16 Q. Besides the printer cartridge, ink
17 cartridge, do you remember anything else?

18 A. Well, yes. Like they wanted specific
19 magazines. I don't know if it was, like, Scientific
20 American or something to that effect. It was
21 wasn't, like, Playboy.

22 Q. Okay. Did you ever answer phones?

23 A. Yes.

24 Q. When did you answer phones?

25 A. That day.

1 Q. Do you remember anything notable about the
2 phone calls?

3 A. I just remember I always had to say, He's
4 unavailable, can I take a message?

5 Q. And where did you take a message?

6 A. On a little notepad next to the phone.

7 Q. Do you recall any small children calling
8 the house that day?

9 A. No.

10 Q. Were you speaking to anyone about their
11 school experience or anything like that?

12 A. No.

13 Q. Did you take any messages for famous
14 people?

15 A. They could have been famous and I would
16 have been clueless.

17 Q. Did you take messages at any other point
18 during the time that you worked with Jeffrey?

19 A. No.

20 Q. And you said you remember at the end of
21 that day being paid by Ghislaine?

22 A. Yes.

23 Q. And you were paid for doing the errands
24 and answering phones and whatever else you did?

25 A. Yes.

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. Did you do anything else that day in terms
4 of errands or things around the house that you
5 remember?

6 A. Not that I recall.

7 Q. Did you come back to answer phones and do
8 errands any other day?

9 A. No.

10 Q. That was the only day you did it?

11 A. Yes.

12 Q. All right.

13 Tell me the second time -- how long was it
14 before you got another sort of contact from anybody
15 at the home?

16 A. Okay. Well, after that -- I remember
17 actually that day of working, I sat with Ghislaine
18 outside on this -- outside table on the patio by the
19 pool. I told her that I was getting ready to go to
20 Nicaragua for spring break on a mission trip. I
21 remember her going, Why would you ever go to
22 Nicaragua? So I was going to be gone the next week
23 for spring break.

24 So she called, after I returned, and asked
25 if I wanted to make \$100 an hour rubbing feet.

1 Q. Was that the whole conversation?

2 A. That was pretty much it. I said, Okay,
3 sure, tell me when.

4 Q. And were you excited about the prospect of
5 rubbing feet and making \$100?

6 A. I was actually with -- while I was on the
7 trip in Nicaragua, I was rubbing feet, I was
8 massaging people, their feet. So it just seemed
9 kind of crazy that it all happened at the same time.

10 Q. How was it rubbing feet?

11 A. I guess I just liked doing it. I didn't
12 know that I did, but I was massaging people's feet.

13 Q. Were these strangers?

14 A. No, no, no. They were -- it was a group
15 of us that went on the trip. So we were all very
16 close.

17 Q. What kind of trip was it?

18 A. It was a -- well, a PBA, you had to do
19 these things called Workshop hours, which you had to
20 do community service, 40 hours every year. And so
21 that was the way to do them all, and you would go on
22 these trips and help build a school or feed children
23 or do some sort of -- something nice.

24 Q. Nice.

25 What other trips did you take while you

1 were there?

2 A. I did a trip and worked with Habitat for
3 Humanity in Baltimore. And then I went back to
4 Nicaragua the next year and did the same thing.

5 Q. Very nice.

6 And you were there for a whole week?

7 A. Yes.

8 Q. All right.

9 So you got a call from Ghislaine after you
10 returned?

11 A. Yes.

12 Q. And that's when she asked you about
13 rubbing feet?

14 A. Yes.

15 Q. And did she tell you when she would like
16 you to come over?

17 A. It was either that night or the next day.

18 Q. And do you know how you got there?

19 A. No.

20 Q. Do you know what you were wearing?

21 A. No, I don't remember.

22 Q. When you got there, I think you said you
23 don't remember if Ghislaine was actually there the
24 second time?

25 A. I want to believe that she was there

1 because she was my main contact, and so I would
2 assume that she was probably at the house and
3 greeted me; however, I do not recall if she was
4 there.

5 Q. It sounds like you met Emmy Taylor?

6 A. Yes.

7 Q. How did you meet Emmy Taylor?

8 A. She was at the house the first day that I
9 worked running errands. And I realized she was also
10 a personal assistant type of person.

11 Q. Do you know who she worked for?

12 A. She, well, Ghislaine, it appeared to me
13 that she worked for Ghislaine. Ghislaine sort of
14 told her what to do and where to go.

15 Q. And I believe you mentioned she called her
16 her slave?

17 A. She did. It was in a joking way, but she
18 said, Yes, that's my slave.

19 Q. You did not see her in any type of slavery
20 situation?

21 A. Not any chains or anything of the sort,
22 no.

23 Q. So tell me what you remember about the
24 second time you went.

25 A. The third time?

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. I'm sorry. You're right. Third time.

4 The second time you went to work, but the third time
5 you were there.

6 A. Correct.

7 So I was escorted up to the bathroom,
8 which is where 99 percent of the massages happened.
9 And Emmy Taylor was with me and Jeffrey. And I
10 don't remember the order, but Emmy was on the table
11 at one point. She took all of her clothes off, got
12 on the table.

13 I remember thinking, Okay, she's just
14 going to strip naked and get on the table. Well,
15 that's cool. We're cool. That's what we do.

16 And Jeffrey was showing me how to massage
17 on her body. And then I took my clothes off and got
18 on the table, and then they showed me what it felt
19 like with the both of them.

20 And then Jeffrey got on the table and Emmy
21 showed me how to massage.

22 Q. So Ghislaine was not in the room?

23 A. No.

24 Q. You said that 99 percent of the massages
25 took place in the bathroom.

1 Did you see massages take place in other
2 places of the house at all?

3 A. Did I see any? No, besides us maybe
4 hanging out on the [REDACTED] and someone massaging his
5 foot or me massaging his foot. But not, like, on a
6 table.

7 Q. So just casual foot-rubbing might happen
8 elsewhere in the home, but not a full-blown, full
9 body massage?

10 MS. McCAWLEY: Objection.

11 THE WITNESS: Yes.

12 BY MS. MENNINGER:

13 Q. Did you see any full-blown, full body
14 massages out by the pool?

15 A. Not that I recall.

16 Q. And do you remember ever giving any
17 yourself?

18 A. By the pool?

19 Q. Out by the pool, yes.

20 A. On a table?

21 Q. Yes.

22 A. No.

23 Q. All right.

24 You said that you had subsequently been
25 trained as a massage therapist, correct?

1 A. Correct.

2 Q. Would you describe it as normal massage
3 protocol for a person to be naked under a towel
4 during a massage, a regular massage?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: Naked under a towel during a
7 massage, the person getting massaged?

8 BY MS. MENNINGER:

9 Q. Yes.

10 A. Yes.

11 Q. And as a massage therapist, you're trained
12 how to drape the person so that they're covered in
13 the right places, correct?

14 A. Yes.

15 Q. So when you were being trained by Emmy and
16 Jeffrey on some massage techniques, did anyone say
17 anything sexual during that conversation?

18 A. Not that I recall.

19 Q. What was the mood like? Was it, you know,
20 laughing?

21 A. Yes. Comfortable.

22 Q. And just to clarify, the people who were
23 giving the massages at the various points in time
24 were clothed while they were doing that, correct?

25 MS. McCAWLEY: Objection.

1 BY MS. MENNINGER:

2 Q. In this period you just described with
3 Emmy Taylor and Jeffrey in a bathroom upstairs on
4 your third visit to the house, people giving the
5 massages had their clothes on, correct?

6 A. Correct.

7 Q. All right.

8 What was the next time you remember coming
9 to the house there?

10 A. The next time was to do a massage. All by
11 myself.

12 Q. Okay. And how did that one come about?

13 A. Hmm, someone must have called me, but I
14 don't remember who.

15 Q. And to whom did you give the massage on
16 this next visit to the house?

17 A. Jeffrey.

18 Q. Was Ghislaine present during that massage?

19 A. No.

20 Q. Did anything unusual occur during that
21 massage?

22 A. After.

23 Q. What happened? After the massage?

24 A. He asked me how well do I orgasm. And I
25 said, I don't, I'm a virgin. And he was quite

1 surprised.

2 Q. Where were you when you were having this
3 discussion?

4 A. In the bathroom.

5 Q. Were you clothed?

6 A. Yes.

7 Q. Was he clothed?

8 A. I don't remember him being naked. He was
9 probably either wrapped with a towel or in a
10 bathrobe.

11 Q. Were you caught off guard by this
12 question?

13 A. Yes.

14 Q. Was that the first time anyone had said
15 anything sexual to you during this --

16 A. Ever? Yes.

17 Q. Did he say anything else that you recall
18 during that conversation?

19 A. I mean, we had a little bit of a
20 conversation about it, but I don't recall
21 specifically.

22 Q. And how did that massage encounter end?

23 A. Normal. There was nothing I had to do,
24 just normal massage.

25 Q. Did he pay you?

1 A. Yes.

2 Q. How much did he pay you?

3 A. \$200.

4 Q. How did he pay you?

5 A. Cash.

6 Q. And where was the cash?

7 A. I don't recall specifically. It was
8 either -- he brought it upstairs with him or it
9 would have been down on his desk.

10 Q. And I'm assuming that you had other
11 massages that you gave him under similar
12 circumstances in the next years, right?

13 A. Many, right.

14 Q. So recalling this particular one is not
15 sticking out in your mind?

16 A. Yes.

17 MS. McCAWLEY: Objection.

18 BY MS. MENNINGER:

19 Q. Do you remember the next time after that?

20 A. I don't. I mean, from there, it's just a
21 blur of random invites to come over and do it.
22 Massage was, like, I would see him maybe three days
23 a row, and I wouldn't see him for two months. It
24 would be kind of that irregular schedule.

25 Q. Do you ever recall a time where you came

1 over every day for three weeks in a row?

2 A. No.

3 Q. Were you paid \$200 per massage?

4 A. Yes.

5 Q. And how long did the massages last?

6 A. Anywhere from 30 minutes to an hour and a
7 half.

8 Q. Did you ever give a four-hour massage to
9 him?

10 A. Good grief, no, not that I recall.

11 Q. Have you ever given a four-hour massage to
12 anyone in your whole life?

13 A. No, I haven't.

14 Q. Tell me how the whole idea of traveling to
15 New York came up.

16 A. I actually was not home. They called
17 my -- my apartment. My roommate answered. When I
18 got home, she said, You need to call Jeffrey Epstein
19 immediately. He wants to take you to New York, but
20 they are leaving at 4:00.

21 And I was excited because I had never been
22 to New York.

23 Q. Are you from

24 A. I am.

25 Q. But you never went to New York?

1 A. Just flying over it.

2 Q. When you said they called, do you know who
3 called your roommate?

4 A. I don't know who called my roommate.

5 Q. In this sort of pre-trip to New York
6 period, do you recall discussing any of the
7 particulars of your massages with Jeffrey, with
8 Ghislaine?

9 MS. McCAWLEY: Objection.

10 BY MS. MENNINGER:

11 Q. If that makes sense.

12 A. No.

13 Q. So before you got this call, had anyone
14 mentioned the idea of traveling to you?

15 A. No.

16 Q. Did you call Jeffrey immediately?

17 A. I did.

18 Q. And what conversation did you have with
19 him?

20 A. Basically he said, I want to take you
21 to -- to New York City. Can you be here quickly?

22 And I got to the house, and he said, Do
23 you have your passport?

24 I said, No.

25 He said, Go get it.

1 So I went back and picked up my passport,
2 and went back to the house before we went to the
3 airport.

4 Q. And why did you need your passport?

5 A. I was ready to find out. I had no idea.

6 Q. This was the spontaneous phase?

7 A. Exactly.

8 Q. So you went and got your passport. You
9 came back. And then what happened?

10 A. Then we went to the airport.

11 Q. And who is we?

12 A. So, I don't remember the ride to the
13 airport, but the people that I recall being on the
14 plane was Jeffrey, Ghislaine, Virginia and I.

15 Q. And when was the first time you met
16 Virginia?

17 A. I believe it was that day.

18 Q. In your previous visits to the house, had
19 you seen her there?

20 A. Not that I recall.

21 Q. And what was your impression the first day
22 you met her?

23 A. She seemed young and blond and cute.

24 Q. What was her personality like?

25 A. I honestly don't recall her personality.

1 Bubbly.

2 Q. Did you see her in the plane or on the
3 trip to New York engaged in any kind of affectionate
4 or sexual contact with Jeffrey?

5 A. No.

6 Q. With Ghislaine?

7 A. No.

8 Q. How did it come to be that you were in a
9 casino in Atlantic City?

10 A. We, as we were flying, Jeffrey said, Why
11 don't you go sit in the cockpit to check out the
12 landing?

13 So we were sitting there, and the pilots
14 told me to go back and tell him that we can't land
15 in New York and that we were going to have to land
16 in Atlantic City.

17 Jeffrey said, Great, we'll call up Trump
18 and we'll go to -- I don't recall the name of the
19 casino, but -- we'll go to the casino.

20 Q. And what happened with an ID issue?

21 MS. McCAWLEY: Objection:

22 THE WITNESS: All I knew is that she was
23 not going to be allowed to gamble, and so I
24 spent time with her. We were just walking
25 around. I don't remember what we did. Because

1 either she didn't have an ID or she was too
2 young. I don't remember specifically why. I
3 just knew that she could not gamble.

4 BY MS. MENNINGER:

5 Q. Okay. So you walked around with her in
6 Atlantic City?

7 A. Uh-huh. In the casino. We never left the
8 casino.

9 Q. Were you disappointed that you couldn't
10 gamble?

11 A. No.

12 Q. When you were walking around and talking
13 to her, did you learn anything about her?

14 A. Not that I recall.

15 Q. Did you have an impression about why she
16 was on the trip?

17 A. At that point, no. I was so new to the
18 whole thing, I was just trying to figure out my
19 position and who everybody was. At that point, I
20 had no idea -- I didn't know anything sexual was
21 happening at all. So I just felt like she was just
22 another visitor.

23 Q. Did she tell you at that time that she had
24 been to New York with Jeffrey before?

25 A. Not that I recall.

1 Q. Did she tell you anything about Ghislaine
2 during that walk-about?

3 A. No.

4 Q. And then you all traveled on to New York
5 that same night?

6 A. Yes.

7 Q. How long were you in New York for that
8 visit?

9 A. It was maybe two nights.

10 Q. And where did you sleep at night?

11 A. I slept in one of the guest rooms at his
12 townhouse on 71st Street.

13 Q. And did you stay in the same room as
14 Virginia?

15 A. No.

16 Q. Do you know where she stayed?

17 A. No.

18 Q. All right.

19 And then when you got into Manhattan, how
20 did it come to be that you were doing some
21 sightseeing?

22 A. Well, they knew that I had never been, so
23 I believe Jeffrey asked the driver and Emmy just to
24 drive me around to see the Empire State Building.
25 That's all I remember. It was late. It was dark.

1 It wasn't long, maybe 30 minutes.

2 Q. When you got back to the house, what
3 happened?

4 A. I walked into the front door, and
5 Ghislaine stuck her head over the grand staircase
6 and asked me to come upstairs into the living room.

7 Q. And can you describe the living room?

8 A. ■■■, it was very large and very formal.
9 And Jeffrey and her and Virginia and Prince Andrew
10 were there.

11 Q. What were they all doing when you came in?

12 A. Just socializing. I don't remember them
13 doing an activity. It was just being together.

14 Q. Was anyone unclothed?

15 A. No.

16 Q. Was this the same room where Jeffrey had a
17 desk?

18 A. It could have been, but I can't remember.

19 Q. Did you go to New York more than one time?

20 A. Yes.

21 Q. How many times did you go to New York?

22 A. Two times.

23 Q. This was the only time that you met Prince
24 Andrew in New York, though?

25 A. Yes.

1 Q. When you came upstairs, where was Virginia
2 sitting?

3 A. I don't remember.

4 Q. Do you remember what she was wearing?

5 A. No.

6 Q. She was already there when you got back
7 from sightseeing?

8 A. Yes.

9 Q. Tell me what happened with the caricature.

10 A. Ghislaine asked me to come to a closet.
11 She just said, Come with me. We went to a closet
12 and grabbed the puppet, the puppet of Prince Andrew.
13 And I knew it was Prince Andrew because I had
14 recognized him as a person. I didn't know who he
15 was.

16 And so when I saw the tag that said Prince
17 Andrew, then it clicked. I'm like, that's who it
18 is.

19 And we went down -- back down to the
20 living room, and she brought it in. It was just
21 funny because -- he thought it was funny because it
22 was him.

23 Q. Tell me how it came to be that there was a
24 picture taken.

25 MS. McCawley: Objection.

1 THE WITNESS: I just remember someone
2 suggesting a photo, and they told us to go get
3 on the [REDACTED]. And so Andrew and Virginia sat
4 on the [REDACTED], and they put the puppet, the
5 puppet on her lap.

6 And so then I sat on Andrew's lap, and I
7 believe on my own volition, and they took the
8 puppet's hands and put it on Virginia's breast,
9 and so Andrew put his on mine.

10 BY MS. MENNINGER:

11 Q. And this was done in a joking manner?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Yes.

14 BY MS. MENNINGER:

15 Q. Do you recall a photo being taken of that
16 event?

17 A. Yes.

18 Q. You've never seen the photo?

19 A. No.

20 Q. You don't know whose camera it was?

21 A. No.

22 Q. Virginia was sitting on the [REDACTED] next to
23 Andrew, not in a big leather armchair?

24 A. Maybe. I'm just trying to remember how I
25 remember it.

1 Q. To the best of your recollection, you went
2 and sat on Andrew's lap, correct?

3 A. Yes.

4 Q. On his knee?

5 A. Yes.

6 Q. And Virginia was not sitting on his knee,
7 correct?

8 A. I don't recall. I just remember I was --
9 she might have been on his other knee, like Santa.
10 I don't remember.

11 Q. After that, do you remember any other
12 pieces of that social engagement?

13 A. No.

14 Q. Do you know where you went?

15 A. From there, I went to bed.

16 Q. Were people drinking?

17 A. No.

18 Q. Did you hear Ghislaine Maxwell tell
19 Virginia to do anything while you were in that room?

20 A. No.

21 Q. Do you recall what happened the next day
22 in New York?

23 A. Bits. I mean, that was the day I went to
24 Victoria's Secret. I went and walked around by
25 myself and went to a souvenir shop, got a mug or

1 something. That's all I recall.

2 Q. Did you go anywhere with Virginia?

3 A. ■■■, my gosh, yes. We went to Phantom of
4 the Opera.

5 Q. Who else went?

6 A. I think it was just she and I. I forgot
7 about that. Thank you for that memory.

8 Q. It's my job.

9 Anything else you remember about that day
10 in New York?

11 A. No.

12 Q. You said you had given a massage to
13 Jeffrey while you were there on that trip or was it
14 a subsequent trip?

15 A. That trip.

16 Q. And how did that come to be?

17 A. Either he or somebody asked me to go and
18 do it. Someone showed me to the room, but I don't
19 remember who it was.

20 Q. Can you describe that room?

21 A. Yes. It was high ceilings, dark. There
22 were, like, dark red walls or dark blue walls or
23 dark blue carpeting or something. It had a massage
24 table set up in the middle, and there was a large --
25 I want to say like a 15-foot photo, either photo or

1 painting of a naked girl.

2 Q. Pornographic or artistic?

3 A. No. No, I wouldn't say pornographic.

4 Artistic.

5 Q. Artistic.

6 Was Ghislaine present during that massage?

7 A. No.

8 Q. Did something about that particular
9 massage session stand out to you?

10 A. Yes. That was when I was first asked to
11 squeeze and rub his nipples while he pleased
12 himself.

13 Q. And did he say that's what he was going to
14 do?

15 A. He -- yes, he was just very blunt about
16 it. He said, Rub my nipples, I'm going to jerk off.

17 I was like, No, done.

18 Q. And you walked out?

19 A. I did.

20 Q. Were there any repercussions of you
21 walking out?

22 A. Amazingly, no. Knowing what I know now,
23 I'm surprised I was ever called back. But, no, I
24 just stood my ground and walked out. I'm not
25 comfortable with that.

1 Q. Do you know personally whether anyone else
2 had said no to him?

3 A. No.

4 Q. Did anyone ever tell you that they had
5 been in a massage scenario and told him no?

6 A. No.

7 Q. Do you recall when in your trip the
8 massage occurred?

9 A. Well, it was not the day we landed. It
10 must have been that next day that we were there.

11 Q. Do you remember anything else about
12 Virginia from that trip other than the Prince Andrew
13 thing and Phantom of the Opera?

14 A. Well, we were getting ready to leave to go
15 to the airport, and we were waiting. She and I sat
16 on the steps in the foyer. I do remember just kind
17 of asking a few questions to try to understand her
18 role, because at that point now I knew what he
19 wanted from me in the massage. And -- but she did
20 not make it clear to me that she was participating
21 in that. So I was prodding gently to see if there
22 was anything happening that shouldn't have been,
23 because I was getting the impression that she was --
24 she told me she was 17.

25 Q. She told you she was 17?

1 A. Uh-huh.

2 Q. How did that come up?

3 A. I asked her.

4 Q. Was anyone else present during this
5 conversation?

6 A. No.

7 Q. You mentioned in your earlier testimony
8 that she seemed orphan-like.

9 A. Yes.

10 Q. But you said that was something you had
11 said to Ms. McCawley, correct?

12 A. Correct.

13 Q. That was not said at the time?

14 A. Right. No. At the time I was getting an
15 impression that she did not have a family or she had
16 walked away from her family. And it seemed to me,
17 you know, they had just sort of adopted her, not as
18 a child, but they would take care of her.

19 Q. Did you observe anyone speaking to her as
20 a child, like make up your bed?

21 A. No.

22 Q. Did you observe whether she was using
23 drugs during that trip?

24 A. No.

25 MS. McCAWLEY: Objection.

1 BY MS. MENNINGER:

2 Q. Did you ever observe her using drugs?

3 A. Not that I recall.

4 Q. Did she tell you that she was using Xanax?

5 A. No.

6 Q. Cocaine?

7 A. No.

8 Q. Ecstasy?

9 A. No.

10 Q. Heroin?

11 A. No.

12 Q. When was the second trip you took to New
13 York?

14 A. Later. Maybe 2005. I don't know. I
15 could look in the flight record.

16 Q. That's all right.

17 A. I don't remember exactly.

18 Q. That's all right.

19 You just recall it being several years or
20 so after?

21 A. Yes. Several years later.

22 Q. And just so I'm clear, can you just list
23 for me the places you recall traveling with Jeffrey?

24 A. Yes. That first trip was New York and the
25 Virgin Islands. And then not again until around

1 2005, we went to New Mexico and to New York City and
2 the Virgin Islands.

3 Q. So you were in New York twice and the
4 Virgin Islands twice and New Mexico once?

5 A. Yes.

6 Q. Anywhere else?

7 A. No.

8 Q. Were those primarily on the private plane?

9 A. Yes.

10 Q. You said you flew commercially once to get
11 back?

12 A. Yes.

13 Q. Did you recall any other commercial
14 flights?

15 A. He bought a couple of flights for me when
16 I wanted to go up to New York for personal reasons.
17 One time I went to New York commercially, and I was
18 there with friends, but I did go over to his house
19 while I was in the city.

20 Q. And that's not the trip to New York?

21 A. No. Separate.

22 Q. Would you characterize your relationship
23 with Jeffrey as friendly?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Yes.

1 BY MS. MENNINGER:

2 Q. If you asked him to buy a ticket to New
3 York, that might be something that he would do?

4 A. I never asked him to do anything for me,
5 but I told him I was interested in something, and he
6 always offered.

7 Q. The second trip to New York, anything
8 memorable about that? The one -- I'm sorry, the one
9 that you mentioned that was with Jeffrey.

10 A. I do recall Nadia being there. While I
11 massaged, she gave him a facial, but nothing sexual
12 happened.

13 Q. And do you recall if Ghislaine was part of
14 that trip or not?

15 A. I remember her being in New Mexico.

16 Q. What do you remember about her being in
17 New Mexico?

18 A. I remember she took me to -- when they
19 were building the ranch, they had a little
20 three-bedroom home, just like a prefab house. She
21 took me over there. So we went for a little walk.

22 I remember she had two new puppies named
23 Max and Mini, little Yorkies. And I want to say
24 that it was around Jeffrey's birthday when we were
25 there, but nothing -- there was no, like,

1 celebration or cake with candles. It was just
2 another day.

3 Q. You said that the Virgin Islands were a
4 part of that second trip, as well?

5 A. Yes.

6 Q. And do you remember Ghislaine being part
7 of the Virgin Islands the second time?

8 A. Yes. That's when she called -- went to
9 bed and kissed us all on the head and called us her
10 children.

11 Q. Who were the other participants in that
12 session?

13 A. That's who -- I don't recall who was
14 there. I want to say that Nadia was.

15 Q. But Virginia was not there?

16 A. Virginia was not there.

17 Q. Do you recall the point in time in which
18 Virginia went away?

19 A. Sort of. After the trip to New York, I
20 was given her phone number to call. And I remember
21 one time I tried to get ahold of her. Her boyfriend
22 answered. A boyfriend, I would assume, and he
23 sounded like he was high. And I couldn't find out
24 where she was. And then from there on, she was out
25 of the picture.

1 Q. Do you recall how long after the New York
2 trip that occurred?

3 A. I would say it was probably within a month
4 or two.

5 Q. Did she tell you she was working
6 elsewhere?

7 A. No.

8 Q. Did you ask her?

9 A. No.

10 Q. Did she mention that she was a waitress?

11 A. No.

12 Q. And worked at Taco Bell?

13 A. Huh-huh.

14 Q. Did you speak to her boyfriend or a
15 boyfriend at any other time associated with her?

16 A. No.

17 Q. Did you meet her boyfriend?

18 A. No.

19 Q. Her fiancé?

20 A. No.

21 MS. McCawley: Objection.

22 BY MS. MENNINGER:

23 Q. When you were on the plane with Jeffrey
24 during these two trips, he was present on all of
25 those flights?

1 A. Yes.

2 Q. Did you observe any sexual behavior
3 happening on the plane?

4 A. No. He told me a story of something that
5 had happened one time.

6 Q. Did it involve Ghislaine Maxwell?

7 A. No.

8 Q. Did it involve [REDACTED]?

9 A. No.

10 Q. And you didn't see anything?

11 A. No.

12 Q. You did give massages to Ghislaine
13 Maxwell, correct?

14 A. Yes.

15 Q. On how many occasions?

16 A. Maybe somewhere between five and 10.

17 Q. Was that over the course of the five
18 years?

19 A. Yes.

20 Q. Was there some point during that five
21 years where Ghislaine Maxwell was not around as
22 much?

23 A. Yes.

24 Q. Do you recall when that was?

25 A. In the middle.

1 Q. Did you know why that might be?

2 A. No.

3 Q. Is that about the time that you started
4 seeing Nadia more frequently?

5 A. Yeah, I guess she was probably in the
6 picture more. Her and Sarah both had kind of been
7 around the most.

8 Q. Did you observe Nadia or Sarah appearing
9 to act like Jeffrey's girlfriend?

10 A. Nadia, not Sarah.

11 Q. What did you observe?

12 A. She was just very loving, kissing him.

13 Q. Did you know how old she was?

14 A. I didn't know.

15 Q. So you gave massages to Ghislaine five or
16 10 times. Was there anything unusual about those
17 massages?

18 A. No.

19 Q. You've been quoted in the press perhaps as
20 saying that she wasn't very picky?

21 A. About massage?

22 Q. About her massages.

23 A. Not like Jeffrey, I guess. I mean, saying
24 that meant that, you know, I would do whatever I
25 wanted to do in the massage; whereas, Jeffrey was,

1 like, Do my foot, do my leg. He would kind of
2 narrate what he wanted. She just wanted a massage.
3 So if that makes sense.

4 Q. She may have been naked under a towel --

5 A. Definitely.

6 Q. -- in a regular massage fashion?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: Yes. Actually, I do recall
9 an instance where I was massaging her and
10 Jeffrey came into the room and he did something
11 sort of sexual to her, whether it was fondling
12 her or slapping her butt or something, and she
13 brushed him off like she was embarrassed.

14 BY MS. MENNINGER:

15 Q. So she never asked you to touch her in a
16 sexual manner, correct?

17 A. No.

18 Q. And she did not rub her breasts on you,
19 for example?

20 A. No.

21 MS. McCAWLEY: Objection.

22 BY MS. MENNINGER:

23 Q. She did not demand that you perform oral
24 sex on her?

25 A. No.

1 Q. Did she did not demand that you undress
2 during your massages?

3 A. No.

4 Q. There was nothing from her that was sexual
5 during the massages that you gave to her?

6 MS. McCAWLEY: Objection.

7 THE WITNESS: Correct.

8 BY MS. McCAWLEY:

9 Q. Do you recall when the last time you gave
10 her a massage was?

11 A. I don't recall.

12 Q. Do you recall meeting with her in about
13 2006 when she was in town for some helicopter
14 training?

15 A. I do recall that.

16 Q. Do you recall giving her some massages
17 during that period?

18 A. Yes.

19 Q. Do you remember going out to dinner with
20 her and to a movie?

21 A. I remember to a movie, and I don't
22 remember if we went to dinner. I remember her
23 cooking dinner. That was another way she impressed
24 me: She knew how to [REDACTED] like a chef. She had done
25 some culinary training.

1 Q. And you guys had a normal type
2 conversation?

3 A. Yes. It was very fun.

4 MS. McCAWLEY: Objection.

5 MS. MENNINGER: I would like to take about
6 a 5-, to 10-minute break, if that's okay.

7 THE VIDEOGRAPHER: Off the record at
8 11:05.

9 (Thereupon, a recess was taken, after
10 which the following proceedings were held:)

11 THE VIDEOGRAPHER: This is the beginning
12 of Disk 2. On the record at 11:25.

13 BY MS. MENNINGER:

14 Q. Hi. I believe when we left off I was
15 asking you about massages that you gave to
16 Ghislaine.

17 Did Ghislaine pay you when she got a
18 massage from you?

19 A. Yes.

20 Q. Do you know how much she paid you?

21 A. I believe it was 200. It was the going
22 rate.

23 Q. The same as you were getting paid by
24 Jeffrey, correct?

25 A. Yes.

1 Q. Ghislaine was not present when you were
2 giving massages to Jeffrey, correct?

3 MS. McCAWLEY: Objection.

4 THE WITNESS: Correct.

5 BY MS. MENNINGER:

6 Q. At some point Jeffrey became more
7 aggressive with you, correct?

8 A. Correct.

9 MS. McCAWLEY: Objection.

10 BY MS. MENNINGER:

11 Q. At what point was that?

12 A. In the last year.

13 Q. And what does that mean to you, "became
14 more aggressive"?

15 A. He was pressuring me to do more than I was
16 comfortable with doing.

17 Q. Is that what ultimately caused you to
18 leave working for Jeffrey?

19 A. What caused me to leave was when it was
20 made public what I was doing.

21 Q. What do you mean by that?

22 A. Well, after I had spoken with the police
23 report -- the police and there was a police report,
24 I did not realize that was public knowledge,
25 journalists would get a hold of. So at one point

1 the news channel 12 showed up at my door asking me
2 questions.

3 Q. When Jeffrey was pressuring you to do more
4 than you felt comfortable with, did you observe him
5 being more aggressive in general? Outside of the
6 massage context?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: No.

9 BY MS. MENNINGER:

10 Q. Do you know whether he was taking any type
11 of steroids?

12 A. No.

13 Q. Did you ever see him wearing a patch or
14 something like that?

15 A. I don't recall.

16 Q. Did you tell anyone that Jeffrey was
17 becoming more aggressive with you contemporaneous
18 with when it was happening?

19 MS. McCAWLEY: Objection.

20 THE WITNESS: No.

21 BY MS. MENNINGER:

22 Q. When Jeffrey asked you to do other things
23 besides a normal massage, did he offer to pay you
24 additionally?

25 A. Yes.

1 Q. How much?

2 A. One hundred dollars extra.

3 Can I clarify?

4 Q. Absolutely.

5 A. He didn't ever say he would pay me more,
6 but when the massage was more than just a massage
7 and it was sexual, then he would pay me more.

8 Q. It wasn't a discussion; it's just what
9 happened?

10 A. Correct.

11 Q. Thank you for clarifying.

12 The things that took place with you and
13 Jeffrey behind closed doors were when you were a
14 consenting adult, correct?

15 A. Yes.

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Correct.

18 BY MS. MENNINGER:

19 Q. And you did not have knowledge of what
20 took place with other women behind closed doors and
21 Jeffrey, correct?

22 MS. McCAWLEY: Objection.

23 THE WITNESS: Correct.

24 BY MS. MENNINGER:

25 Q. Do you recall giving an interview to a

1 reporter from the Mail on Sunday?

2 A. Yes.

3 Q. You told that reporter, I believe, that
4 the police report painted a picture that it was a
5 big orgy all the time, but it wasn't?

6 A. What I saw, I did not see anything out in
7 the open sexually. Me, personally.

8 Q. Right. You did not see orgies happening
9 in the pool, for example?

10 A. No.

11 Q. You did not see people engaging in sexual
12 conduct out in the open areas of the home, correct?

13 A. Right.

14 MS. McCAWLEY: Objection.

15 BY MS. MENNINGER:

16 Q. When you became aware of the allegations
17 against Jeffrey, those came as a surprise to you,
18 correct?

19 MS. McCAWLEY: Objection.

20 THE WITNESS: Correct.

21 BY MS. MENNINGER:

22 Q. And the surprise was that it involved
23 underaged girls making that allegation, correct?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Correct.

1 BY MS. MENNINGER:

2 Q. You were asked some questions with
3 Ms. McCawley about nude photographs that were
4 present in the home? Homes?

5 A. Uh-huh.

6 Q. In Palm Beach, I believe you said there
7 were some in the room where the massage table was?

8 A. Yes.

9 Q. Can you tell me what you recall seeing?

10 A. It wasn't candid photos. They were all,
11 like, staged.

12 Q. Like a model?

13 A. Yes. And my -- I don't recall necessarily
14 knowing any of the people in those photos. I
15 remember at one point there was a photo of myself,
16 but...

17 Q. Were they fully frontally nude or were
18 they staged, like, with, you know, parts of bodies
19 showing?

20 A. I really only remember topless photos. I
21 don't remember full frontal photos.

22 Q. So exposing the breasts, but not exposing
23 the genitalia?

24 A. Not that I recall. And Ghislaine's
25 bathroom, I believe there was a photo of her

1 topless, or a painting.

2 Q. A painting?

3 A. Uh-huh.

4 Q. Did you see any nude or semi-clad photos
5 of young girls?

6 A. No.

7 Q. Preteens, for example?

8 A. No.

9 Q. Something you would consider child
10 pornography?

11 A. Never.

12 Q. Other than in the bathroom or the massage
13 room at the Palm Beach home, do you recall any other
14 place in the Palm Beach home where you saw any of
15 these topless photos of women?

16 A. I remember there being photos everywhere,
17 and the ones that stick out in my memory are the
18 ones -- there was a photo of Ghislaine with the
19 Pope. It would not surprise me if there were naked
20 photos around. I just didn't retain them in my
21 memory.

22 Q. So when you say there were photos
23 everywhere, you mean just photos in general?

24 A. Yes. They had a lot of photos around the
25 house.

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. And Ghislaine was not topless in a photo
4 with the Pope, just so I'm clear?

5 A. Correct.

6 Q. I just want to make sure we get that
7 record really clear.

8 So you recall there being photos
9 everywhere; you just remember a couple sticking out
10 in your brain as being topless?

11 A. Yes.

12 Q. And the walls on the staircase to the
13 upstairs were not just covered with nude
14 photographs, to your recollection?

15 A. To my recollection, I just -- I don't
16 remember.

17 Q. Did you observe what you would consider to
18 be child pornography on any computer in the home?

19 A. No.

20 Q. Did you observe anyone taking photographs
21 of young girls in the home?

22 A. No.

23 Q. The photograph of yourself that you saw,
24 was that something that you had posed for?

25 A. Not, like, professionally. But I was just

1 sitting, and I believe Jeffrey took the photo. I
2 was just sitting on a [REDACTED] upstairs in the
3 bathroom.

4 Q. It wasn't taken by a hidden camera?

5 A. No. No. I was smiling in the picture.

6 Q. And, likewise, in the New York home, did
7 you see anything -- you described a large painting
8 or a photograph that was in the massage room?

9 A. Yes.

10 Q. Do you recall any other photos of
11 semi-clad or naked females?

12 A. I don't recall.

13 Q. Anything that you would consider to be
14 child pornography that you saw in the New York home?

15 A. No.

16 Q. And, likewise, in New Mexico?

17 A. I don't recall.

18 Q. Do you recall seeing any semi-clad photos
19 in New Mexico at all?

20 A. I do not recall.

21 Q. And the Virgin Islands?

22 A. Yes, in his bathroom, [REDACTED] bathroom.

23 Q. And what do you recall, if anything, about
24 that photo?

25 A. There was a photo of me in there.

1 Q. And, again, was that something that you
2 were okay with?

3 A. Yes.

4 Q. Jeffrey Epstein never told you that he
5 knowingly had sexual contact with an underaged girl,
6 correct?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: When I asked him if the
9 accusations were true, after I spoke with the
10 police, he said yes, but they lied about their
11 age.

12 BY MS. MENNINGER:

13 Q. How did that conversation come about?

14 A. He asked me if the police had ever spoken
15 to me and I asked him, is it true.

16 Q. And you were talking about underaged
17 girls?

18 A. Correct.

19 Q. And he said that he had been lied to by
20 those girls?

21 A. Yes.

22 Q. Did he say anything else to you about it?

23 A. No.

24 Q. Did you ask him anything else about it?

25 A. No.

1 Q. Did you attempt to have any conversation
2 like that with Ghislaine Maxwell?

3 A. No.

4 Q. I saw one press report that said you had
5 met Cate Blanchett or Leonardo DiCaprio?

6 A. I did not meet them, no. When I spoke
7 about them, it was when I was massaging him, and he
8 would get off -- he would be on the phone a lot at
9 that time, and one time he said, ■■■, that was
10 Leonardo, or, That was Cate Blanchett, or Bruce
11 Willis. That kind of thing.

12 Q. So name-dropping?

13 A. Yes.

14 Q. So you had not met Cate Blanchett or
15 Leonardo DiCaprio?

16 A. I have not.

17 Q. Would you remember if you had?

18 A. I would hope I would remember.

19 Q. Did you meet Cameron ■■■?

20 A. No.

21 Q. Bill Clinton?

22 A. No.

23 Q. Did you see Bill Clinton on the island?

24 A. No.

25 Q. Did you see Bill Clinton in a helicopter

1 being flown by Ghislaine Maxwell?

2 A. No.

3 Q. Did Ghislaine Maxwell ever tell you that
4 she had flown Bill Clinton in her helicopter?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: I don't recall her saying
7 that.

8 BY MS. MENNINGER:

9 Q. Did you ever meet Senator ?

10 A. I don't know what he looks like. I might
11 have.

12 Q. If I told you he was from Maine, would
13 that stick out in your mind?

14 A. It should, but I do not recall meeting
15 him.

16 Q. Do you ever remember meeting Prime
17 Minister Ehud Barak from Israel?

18 A. No.

19 Q. Do you recall meeting any prime minister?

20 A. No.

21 Q. Any foreign president?

22 A. No.

23 Q. Nobel Prize winners?

24 A. Not to my knowledge.

25 Q. Naomi [REDACTED]?

1 A. No.

2 Q. Al Gore?

3 A. No.

4 Q. Alan Dershowitz?

5 A. No.

6 Q. Les Wexner?

7 A. No.

8 Q. Tom Pritzker?

9 A. No.

10 Q. Kevin Spacey? I may have already asked

11 you, but have you met Kevin Spacey?

12 A. No.

13 Q. Did you meet Governor Bill [REDACTED] of

14 New Mexico?

15 A. Hmm, I want to say that he was supposed to

16 come to dinner when we were in New Mexico. I don't

17 know if I met him. I believe that he and Ghislaine

18 had dinner separate from myself.

19 Q. Jean Luc Brunel?

20 A. Yes.

21 Q. You did meet him?

22 A. Yes.

23 Q. Tell me about that.

24 A. He was just in the house at one time in

25 Palm Beach.

1 Q. Socializing?

2 A. Yes.

3 Q. Did you observe him to be with underaged
4 girls?

5 A. I don't recall.

6 Q. Did you give him a massage?

7 A. I don't think I did. I gave a lot of
8 guests massages. I don't remember any of their
9 names. So it could have been any of those people
10 besides the movie stars.

11 Q. You would know?

12 A. Exactly.

13 Q. And did you engage in sexual contact with
14 any of the guests for whom you gave a massage?

15 A. No. That's why he would call me for his
16 guests, because I was not comfortable with the
17 sexual contact. So he still wanted to employ me as
18 a massage therapist, but it was all normal.

19 Q. So this was an actual conversation that
20 you had?

21 A. No, but I -- I noticed. I noticed that I
22 wasn't -- I was massaging him less and less and
23 massaging his guests more.

24 Q. So there was a change in the frequency
25 with which you were giving Jeffrey Epstein massages?

1 A. Right.

2 Q. And an increase corresponding to massages
3 you were giving to guests, correct?

4 A. Yes.

5 Q. Did any of the guests for whom you gave a
6 massage mention that they expected something sexual?

7 A. No.

8 Q. Did they ask you to engage in sexual
9 contact and you refused?

10 MS. McCAWLEY: Objection.

11 THE WITNESS: No.

12 BY MS. MENNINGER:

13 Q. Marvin Minsky?

14 A. I don't know that.

15 Q. [REDACTED] Lucas?

16 A. No.

17 Q. Donald Trump?

18 A. No.

19 Q. Did you ever massage Donald Trump?

20 A. No.

21 Q. Sorry, I have to ask, but did you ever
22 have sex with Alan Dershowitz in the back of a
23 limousine with Virginia and Jeffrey present?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Absolutely not.

1 BY MS. MENNINGER:

2 Q. Do you know who Alan Dershowitz is?

3 A. I do.

4 Q. You would remember --

5 A. I would remember that.

6 Q. Did you ever see [REDACTED] with any
7 of the people that I just asked you about?

8 A. No.

9 Q. Did Virginia ever talk to you about having
10 been with any of those people?

11 MS. McCAWLEY: Objection.

12 THE WITNESS: No.

13 BY MS. MENNINGER:

14 Q. Did she tell you that she had met any of
15 those people?

16 A. No.

17 Q. I believe you saw in that police report a
18 reference to a friend of Jeffrey named Glenn and his
19 wife?

20 A. Uh-huh.

21 Q. Do you remember them?

22 A. Vaguely.

23 Q. Tell me what you remember.

24 A. I remember they had an apartment in -- on
25 Breakers Row. I went up there and massaged. It may

1 have been more than once, but I only really remember
2 one time. But there was nothing sexual.

3 Q. Neither with the wife, nor with Glenn?

4 A. Right.

5 Q. Do you remember the apartment?

6 A. I only remember that I had to carry my
7 massage table up some stairs.

8 Q. So you actually gave the massage on a
9 massage table?

10 A. Yes.

11 Q. Does that help you place it in time as to
12 when that might have occurred? In other words --

13 A. Well --

14 Q. -- did you get your massage license at
15 some point and a massage table?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Yes. He bought me my
18 massage table around the time that I went to
19 massage school. So it could have been any time
20 after. If I thought really hard, I could
21 remember when I went to school. But it -- I
22 want to say it's around 2003.

23 BY MS. MENNINGER:

24 Q. Nothing sexual happened with Glenn?

25 A. No.

1 Q. Did Glenn ask you to give him a massage on
2 the floor of the home?

3 A. I don't recall.

4 Q. Did you ever discuss Glenn with Virginia?

5 A. Not to my recollection.

6 Q. Did you ever go to Virginia's home?

7 A. No.

8 Q. Do you know where she lived?

9 A. No.

10 Q. Did she talk about it?

11 A. Not that I remember.

12 Q. Did you see anything in your interactions
13 with Virginia that led you to believe that she was a
14 sex slave?

15 MS. McCAWLEY: Objection.

16 THE WITNESS: No.

17 BY MS. MENNINGER:

18 Q. Did you see anyone forcing her to remain
19 in the home?

20 A. No.

21 Q. Did you see her look traumatized at some
22 point?

23 MS. McCAWLEY: Objection.

24 THE WITNESS: No.

25

1 BY MS. MENNINGER:

2 Q. Did you see anything that led you to
3 believe [REDACTED] had been trafficked,
4 sexually trafficked to third parties?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: No.

7 BY MS. MENNINGER:

8 Q. Did Virginia ever tell you that she had
9 been trafficked?

10 A. No.

11 MS. McCAWLEY: Objection.

12 BY MS. MENNINGER:

13 Q. Did you hear anyone direct [REDACTED]
14 [REDACTED] to go have sex with someone?

15 A. No.

16 Q. Did Jeffrey ever ask you to go have sex
17 with another person?

18 A. No.

19 Q. Did Ghislaine Maxwell ever ask you to go
20 have sex with another person?

21 A. No.

22 Q. Did Ghislaine Maxwell ever ask you to give
23 a massage to someone else?

24 A. No.

25 Q. Did Ghislaine Maxwell ever ask you to

1 dress up in any outfit?

2 A. No.

3 Q. Did she ever buy you an outfit for you to
4 wear in terms of a sexual profile?

5 A. No.

6 Q. Did she tell you what kind of clothes you
7 should buy?

8 A. No.

9 Q. Did she direct you to go get Brazilian
10 bikini waxes?

11 A. No.

12 Q. Did she direct you to go get your teeth
13 whitened?

14 A. No.

15 MS. MENNINGER: I would like to mark as an
16 exhibit -- I have no recollection what number
17 we're on. Thank you. Exhibit 5.

18 (The referred-to document was marked by
19 the court reporter for Identification as
20 [REDACTED] Exhibit 5.)

21 BY MS. MENNINGER:

22 Q. Have you seen this article before?

23 A. It has followed me everywhere.

24 MS. McCAWLEY: I'm sorry. Can I just ask
25 you to put the [REDACTED] numbers on the record?

1 MS. MENNINGER: Sure. It's [REDACTED] marked
2 [REDACTED] 1131 through 1138.

3 BY MS. MENNINGER:

4 Q. What do you mean it has followed you
5 everywhere?

6 A. Well, if you Google me, it comes up.

7 Q. I wanted to just ask you a couple of
8 questions.

9 On the third page, towards the bottom,
10 there is a photograph that begins "we had a picture
11 taken," and just to orient you, this is in the
12 discussion around the Prince Andrew meeting you had.

13 Did you meet Prince Andrew any other time
14 besides the time you already described in your
15 testimony?

16 A. No.

17 Q. If you want to take a look at that
18 paragraph before I ask you questions.

19 A. Okay.

20 Q. In that paragraph, it describes that
21 Andrew -- Virginia sat on the chair, and then Andrew
22 sat on another chair, and you sat on his lap.

23 MS. McCAWLEY: Objection.

24 BY MS. MENNINGER:

25 Q. Is that what it says?

1 A. That's what it says.

2 Q. Do you recall telling that to the
3 reporter?

4 A. Yes.

5 Q. And this was back in 2007 or so?

6 A. Yes.

7 Q. As you sit here today, does that make
8 it -- does that refresh your recollection that
9 Virginia was sitting in one chair and you were
10 sitting on another, with Andrew?

11 A. Yeah. If I said that, then I remember it
12 that way. I'm just trying to remember. Whether we
13 were on a [REDACTED] or a chair, I just remember the
14 boobs part, the hand on the boobs.

15 Q. I understand that part stands out.

16 And I also completely understand if you
17 don't remember things that happened a long time ago.

18 A. Right.

19 Q. I'm just wondering if, having looked at
20 this news article, it refreshes your memory that
21 Virginia was sitting in a different place?

22 A. In a different chair?

23 Q. Does it?

24 A. It does say that. Does it refresh my
25 memory?

1 Q. Okay. That's fine.

2 A. Yeah, sure.

3 Q. If it doesn't, it doesn't. I'm just
4 asking.

5 Did Virginia say anything to you about
6 having met Prince Andrew before this time in New
7 York?

8 MS. McCAWLEY: Objection.

9 THE WITNESS: She did not say.

10 BY MS. MENNINGER:

11 Q. Did Prince Andrew say or do anything that
12 led you to believe that he had met Virginia prior to
13 that time?

14 A. I don't recall.

15 Q. Did you ever see Al Gore on the island?

16 A. No.

17 Q. Did you see his wife, Tipper Gore, on the
18 island?

19 A. No.

20 Q. What is your understanding of what the
21 lawsuit we are here today is about?

22 A. I understand that Ghislaine is calling
23 Virginia a liar, and so Ghislaine is suing Virginia.
24 I'm sorry. Strike that. Reverse it.

25 Right, Virginia is suing Ghislaine for

1 defamation.

2 Q. And do you know what Virginia said about
3 Ghislaine?

4 A. That Ghislaine recruited her.

5 Q. Do you know anything else that Virginia
6 said about Ghislaine?

7 A. Only what was spoken to me.

8 Q. And I should clarify. Don't tell me
9 anything your lawyer has conveyed to you.

10 A. Exactly. That's all I know. I've met
11 with Virginia once last summer.

12 Q. Okay. Tell me about that.

13 A. She -- there was a moderator between us,
14 like an investigator. And she was in Palm Beach.
15 And it was more about Jeffrey. It was less about
16 Ghislaine. I don't remember specifically about
17 Ghislaine at all.

18 Q. So you met with Virginia and an
19 investigator at the same time?

20 A. Yes.

21 Q. And they were what, talking to you about
22 Jeffrey in what context?

23 MS. McCAWLEY: Objection.

24 THE WITNESS: Basically, they were trying
25 to find people that would help her get her

1 story out, because this is when Dershowitz --
2 Dershowitz was saying nothing was happening and
3 he was calling her a liar. And she was just
4 trying to find people to back up her story.

5 BY MS. MENNINGER:

6 Q. And what did you understand her story to
7 be? Did she tell you?

8 A. That she was recruited to give massages,
9 sexual massages, and have sex with people such as
10 Dershowitz and Andrew. But I knew none of that at
11 the time.

12 Q. Right. Did you tell them anything -- did
13 you tell them during that meeting that you knew of
14 anything about her being recruited to give sex to
15 either Jeffrey or to other people?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Can you rephrase?

18 BY MS. MENNINGER:

19 Q. Yes. That wasn't a very good question.
20 What did you say during this meeting with
21 Virginia and her investigator?

22 A. Basically that I believed her, even though
23 I -- she never spoke to me specifically about what
24 was going on; that once I learned everything that
25 happened based on reading the police report, I

1 believed her side of the story.

2 Q. And did she tell you what her side of the
3 story was?

4 A. You know, just that she wasn't a liar;
5 that, you know, she was there to have sex with men
6 that Jeffrey wanted her to sleep with.

7 Q. Did she tell you in that meeting who she
8 had sex with?

9 A. No.

10 Q. Did she name any of the famous people?

11 A. Only Dershowitz came up.

12 Q. Did you two talk about the incident in New
13 York with the puppet?

14 A. I don't recall.

15 Q. And you formed this opinion about whether
16 she was a liar based on things that you've read in
17 the police report?

18 MS. McCAWLEY: Objection.

19 THE WITNESS: I formed my opinion based on
20 my experience in the house.

21 BY MS. MENNINGER:

22 Q. Okay. And what experience in the house
23 helped you form your opinion that what Virginia is
24 saying is true?

25 A. You know, Jeffrey being open with me about

1 what other girls did for him and that I was not one
2 of those girls.

3 He was always trying to recruit me almost
4 in a way that I could be one of them and travel with
5 him and live the life of luxury if I only -- if only
6 I did this.

7 So after five years of learning what was
8 happening, I can look back knowing -- I only knew
9 Virginia for a very short time. Looking back, I can
10 make assumptions about what was required of her.

11 Q. Did she tell you how old she was when she
12 said she started working with Jeffrey?

13 A. She didn't.

14 Q. Did she tell how long she had worked with
15 Jeffrey?

16 A. No.

17 Q. Have you read all the things that have
18 been attributed to her in the press?

19 A. Many of them.

20 MS. McCAWLEY: Objection.

21 THE WITNESS: I don't know that I've read
22 all of them, but I have read some.

23 BY MS. MENNINGER:

24 Q. In this meeting with Virginia and the
25 investigator, you said Ghislaine Maxwell did not

1 come up?

2 A. Not that -- not that I recall.

3 Q. Do you know the name of the investigator?

4 A. Valerie [REDACTED].

5 Q. Have you read the statement that Ghislaine
6 Maxwell issued to the press?

7 A. No.

8 Q. Do you know what it says?

9 A. No.

10 Q. You said you have read some of Virginia's
11 statements to the press but not all of them?

12 A. I don't know how many there are. I know I
13 read something. I don't know if I read all of them.

14 Q. Have you read her book manuscript?

15 A. No.

16 MS. McCAWLEY: Objection.

17 BY MS. MENNINGER:

18 Q. Did she tell you that she was writing a
19 book?

20 A. No.

21 Q. Did she tell you she was trying to get a
22 book deal?

23 MS. McCAWLEY: Objection.

24 THE WITNESS: No.

25

1 BY MS. MENNINGER:

2 Q. Did she tell you that he hired a ghost
3 rider?

4 A. No.

5 MS. McCAWLEY: Objection.

6 BY MS. MENNINGER:

7 Q. Did she tell you that she hired a literary
8 agent?

9 MS. McCAWLEY: Objection.

10 THE WITNESS: No.

11 BY MS. MENNINGER:

12 Q. Did you speak with John Connelly?

13 A. Yes.

14 Q. When did you speak with John Connelly?

15 A. He was first calling me around the time
16 that everything was coming out in 2006. And I
17 didn't say a lot to him, but I did say a few things.
18 And I asked him not to use my name, and he used my
19 name. And then he quoted me as saying things I
20 never said.

21 Q. Do you know to whom he quoted things that
22 you had never said?

23 A. I don't remember the news outlet, no.

24 Q. So it was published somewhere?

25 A. Somewhere on the Internet.

1 Q. Something that you said to John Connelly
2 got twisted?

3 A. Yes. He put words in my mouth.

4 Q. And it was misreported and published?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: Correct.

7 BY MS. MENNINGER:

8 Q. Have you spoken to him lately?

9 A. No. He called me again at the beginning
10 of last year, around New Year's last year, but I did
11 not return his call.

12 Q. Do you recall what it is he attributed to
13 you falsely?

14 A. It was mostly about how I felt about
15 certain things. I don't remember specifically what
16 he said, but he was giving an opinion for me that I
17 never spoke to him about.

18 Q. And that you did not hold?

19 A. Well, I can't remember what it was. Yeah.

20 Q. Okay. Do you know whether Virginia has
21 lied about any of her experience?

22 MS. McCAWLEY: Objection.

23 THE WITNESS: I don't know that she has
24 lied.

25

1 BY MS. MENNINGER:

2 Q. Do you know that she has told the truth?

3 A. As far as I know, she has.

4 Q. Do you know whether the press has
5 accurately reported everything that Virginia has
6 said?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: I don't know.

9 BY MS. MENNINGER:

10 Q. Other than John Connelly and the police,
11 who else have you spoken to about your experience?

12 A. Well, the woman from the Daily Mail. Her
13 name is Wendy Leigh.

14 Q. And that's Defendant's Exhibit 5 -- not
15 Defendant's Exhibit, just Exhibit 5, correct?

16 A. Correct.

17 Q. Did Wendy Leigh accurately report your
18 statements?

19 A. She did a little bit of embellishment, as
20 well, but the facts are all true.

21 Q. And what parts do you believe are
22 embellished?

23 A. Near the end, when she was doing a
24 summary, when she wrote, "Sure, I had a good time,
25 but I also think it damaged me a bit." I don't

1 recall saying that.

2 And there's another part in here where she
3 said I said that I made a deal with the devil, which
4 I never would have said that. The words she used.

5 Q. On page 2 of 8, it's about -- it's about
6 even with the hem of your skirt.

7 A. "I made a pack with the devil in exchange
8 for excitement and glamour. I was only a college
9 student. I was hard-up and foolish."

10 That I never said, any of that. I was a
11 college student, that's true. "Hard-up and
12 foolish," I would have never called myself foolish.

13 Q. Were you paid any money for this
14 interview?

15 A. I was paid \$1,500.

16 Q. And how long did the interview last?

17 A. A couple of hours.

18 Q. Where did it take place?

19 A. At Cafe Boulud in the Brazilian Court
20 Hotel in Palm Beach.

21 Q. Who else besides Wendy Leigh and John
22 Connelly and the police --

23 MS. McCAWLEY: Objection.

24 BY MS. MENNINGER:

25 Q. -- and Virginia and the investigator --

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. -- did you talk to about your experience?

4 A. Family and friends.

5 Q. Did you speak to any other reporters?

6 A. I had other reporters calling me. I
7 avoided almost all of the calls. I had someone
8 coming at me, stalking me. I do not know who he
9 was. He offered me \$25,000 to give a story, and I
10 turned him down.

11 Q. Who?

12 A. He showed up in my work multiple times.

13 Q. There were other stories printed in the
14 Daily Mail, not by Wendy Leigh, later.

15 Did you see any of those stories? I'm
16 sorry. Let me be a little clearer. That attributed
17 comments to you.

18 A. I don't recall specifically, but I feel
19 like I stayed on top of it, and I wasn't surprised
20 when my name was brought up.

21 Q. Do you recall giving another interview?

22 A. No, never.

23 Q. Do you recall anything that was printed
24 other than the John Connelly thing that you believe
25 to be inaccurate?

1 A. No.

2 Q. Was there anybody else present when you
3 were interviewing with Wendy Leigh?

4 A. No.

5 Q. Was she recording it on a recorder?

6 A. Yes.

7 Q. Have you ever heard that recording?

8 A. No.

9 Q. Do you know whether the police were
10 recording their interview with you?

11 A. Yes.

12 Q. Have you ever heard that recording?

13 A. No.

14 Q. Did you ever receive notification that you
15 were named as a victim in any of Jeffrey Epstein's
16 criminal cases?

17 A. No.

18 Q. Other than the \$1,500 from Wendy Leigh,
19 did you receive any other money for making any
20 statements?

21 A. No.

22 Q. Did you give an interview to Virginia's
23 attorneys?

24 A. Yes. Right?

25 MS. McCAWLEY: You can say yes.

1 BY MS. MENNINGER:

2 Q. When was that?

3 A. Two weeks ago, roughly.

4 Q. And who was present during that meeting?

5 A. My lawyer and several others.

6 Q. Several other what?

7 A. Lawyers. I don't know. I don't know who
8 they all are.

9 Q. So Ms. McCawley you recall being there?

10 A. Yes.

11 Q. [REDACTED] you recall being there?

12 A. No. I didn't learn it, no. You weren't
13 there.

14 Q. Brad [REDACTED]?

15 A. Yes.

16 Q. Paul Cassell?

17 A. Maybe. I don't remember.

18 Q. And was that interview recorded?

19 A. I don't know. It may have been. I don't
20 remember.

21 Q. Did anyone ask your permission to record
22 it?

23 A. Maybe. I don't recall.

24 Q. Were you shown any documents during that
25 meeting?

1 A. Flight logs.

2 Q. Any other documents?

3 A. No.

4 Q. What did Ms. McCawley or Mr. [REDACTED] or
5 any of the other lawyers say to you about Ghislaine
6 Maxwell?

7 A. They just asked impressions. They never
8 said anything about her.

9 Q. Were you shown a copy of any report that
10 came out of that interview?

11 A. Which interview?

12 Q. The one with the -- Virginia's attorneys.

13 MS. McCAWLEY: Objection.

14 THE WITNESS: No.

15 BY MS. MENNINGER:

16 Q. You testified earlier about an incident
17 with a camera that Ghislaine Maxwell had given you.
18 I want to ask you some questions about that.

19 A. Sure.

20 Q. Do you know when that was?

21 A. That was in 2002.

22 Q. And why does that date stick out?

23 A. Because I was living -- where I was living
24 specifically and where I had the phone call.

25 Q. Tell me what you remember about the

1 conversation.

2 A. I had been over to her house prior
3 massaging Jeffrey. And I got a phone call from her,
4 and she told me she had a camera for me for my
5 photography class, but yet, she couldn't give it to
6 me yet because during the massage I didn't finish my
7 job and she had to finish it for me.

8 Q. Did she say what she meant?

9 A. No, but I knew.

10 Q. Was there any other time that you had
11 discussed with her finishing your job?

12 A. Not that I recall.

13 Q. Any other time you just recall discussing
14 with her anything about your sexual contact with
15 Jeffrey?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: No.

18 BY MS. MENNINGER:

19 Q. Did she give you the camera?

20 A. I did get the camera.

21 Q. Okay. When did she give you the camera?

22 A. I guess the next time I went to the house.

23 Q. What was said at that time?

24 A. I honestly don't know that she handed it
25 to me. I remember it being there for me.

1 Q. What kind of camera was it?

2 A. A Canon Rebel 35-millimeter.

3 Q. Do you still have it?

4 A. I do not. No one uses 35-millimeter
5 anymore.

6 Q. What's that?

7 A. No one uses 35-millimeter.

8 Q. Back to the cell phone conversation.

9 A. Right.

10 Q. Was it your birthday?

11 A. It was just I was taking a photography
12 class and I needed a camera.

13 Q. Do you know her to be a photographer?

14 A. Not a professional, but I knew she was
15 interested in photography.

16 Q. Did you see her with cameras?

17 A. Yes.

18 Q. Did you see her taking photographs of nude
19 people?

20 A. No.

21 Q. Did she ever ask you to take a photograph
22 of you semi-clad or naked?

23 A. Did she ever ask to take a photo of me?

24 Q. Semi-clad or naked.

25 A. No.

1 Q. Did she ever ask to take a photograph of
2 you at any point?

3 A. I don't remember.

4 Q. Did you tell anyone else about this
5 conversation: You couldn't give it to me now
6 because I hadn't finished my job?

7 A. No.

8 MS. MENNINGER: I think I'm going to
9 reserve the rest of my time for recross, so you
10 all, I guess, can take a break.

11 MR. LOUIS: Can I have one second?

12 MS. MENNINGER: Sure.

13 MS. McCAWLEY: We can go off the record?

14 THE VIDEOGRAPHER: Off the record at
15 12:09.

16 (Thereupon, a recess was taken, after
17 which the following proceedings were held:)

18 THE VIDEOGRAPHER: On the record at 12:10.

19 BY MS. MENNINGER:

20 Q. Sorry, just a couple of more questions.

21 It sounds like maybe there was an
22 additional telephone conference that one might
23 construe as a meeting with attorneys; is that true?

24 A. Correct.

25 Q. All right. Tell me about that.

1 A. They just wanted to -- we had met prior,
2 and they just wanted to clarify a few things and ask
3 a few more questions.

4 Q. Okay. What did they clarify?

5 A. Any other specific times that I had, you
6 know, seen Ghislaine naked, or if I had, you know,
7 had any sexual massages with her, any type of
8 questions like that.

9 Q. Okay. And what did you tell them about
10 having any sexual massages with Ghislaine?

11 A. That I was not asked to do -- to perform
12 anything with her.

13 Q. And you did not?

14 A. Correct.

15 Q. And what did you tell them about specific
16 times of seeing Ghislaine Maxwell naked?

17 A. Only when she would swim or get a massage.

18 Q. And that's swimming -- you mentioned
19 earlier skinny-dipping?

20 A. Correct.

21 Q. And I think you said perhaps some other
22 time that you saw her jump off a dock and swim --

23 A. Correct, yes.

24 Q. -- in the nude?

25 A. Yes.

1 Q. And then you saw her under a towel during
2 massages?

3 A. Yes.

4 Q. Is there any other time that you recall
5 seeing Ghislaine Maxwell naked?

6 A. No.

7 Q. Is there anything else about that
8 telephone conference with the attorneys to clarify
9 that you recall, the topics?

10 A. No.

11 MS. MENNINGER: All right. Thank you. I
12 think we can go off the record now.

13 THE VIDEOGRAPHER: Off the record at
14 12:12.

15 (Thereupon, a lunch recess was taken,
16 after which the following proceedings were
17 held:)

18 THE VIDEOGRAPHER: On the record at 12:54.

19 FURTHER EXAMINATION

20 BY MS. McCAWLEY:

21 Q. Johanna, I'm going to ask you a couple of
22 more just follow-up questions.

23 When Laura was talking to you, she
24 mentioned some names of famous people that you --
25 most of which you had not met.

1 Did you ever meet anybody famous when you
2 were with Jeffrey?

3 A. I met Michael [REDACTED].

4 Q. [REDACTED], really? And where was that?

5 A. At his house in Palm Beach. At Jeffrey's
6 house in Palm Beach.

7 Q. Did you massage him?

8 A. I did not.

9 Q. Anybody else you remember? I know you
10 mentioned David Copperfield earlier. Anybody else?

11 A. No, I'd remember that.

12 Q. I believe you also testified that you had
13 never had a massage before you started working with
14 Jeffrey and Ghislaine; is that correct?

15 A. I don't recall having a massage before
16 then.

17 Q. And I think you said on the first day,
18 when you were doing the clerical work, Maxwell
19 mentioned that you might be able to get a massage;
20 is that correct?

21 A. Yes.

22 Q. Did you tell Maxwell that you had never
23 had a massage at that point?

24 A. I don't remember.

25 Q. Did you remember telling Jeffrey that you

1 had never had a massage?

2 A. No.

3 Q. And then you were talking about the
4 massage -- the first massage when you were being in
5 the room with Jeffrey and Emmy?

6 A. Uh-huh.

7 Q. And I know you said Emmy was naked or took
8 off her clothes at some point?

9 A. Uh-huh.

10 Q. And then laid on the table.

11 And then you changed positions with her;
12 is that what happened?

13 A. Yes. I don't remember the sequence, but
14 at one point she was, I was, and Jeffrey was.

15 Q. And in the -- in the time when there was
16 changeover, for example, when you're on the table
17 and Emmy is not on the table and Jeffrey is not on
18 the table, did Emmy at that point remain naked or
19 did she actually stop and get dressed and continue
20 massaging?

21 A. I don't recall her getting dressed, but I
22 would probably remember if she massaged naked.

23 Q. Do you know if Jeffrey remained naked
24 during that massage?

25 A. He was never, like, naked standing up. He

1 always covered himself with a towel.

2 Q. I believe I asked this, but I just want to
3 clarify to make sure that I did: Did Maxwell ever
4 ask you to bring other girls over to -- for Jeffrey?

5 A. Yes.

6 Q. Yes?

7 A. Yes.

8 Q. And what did you -- did you do anything in
9 response to that?

10 A. I did bring one girl named --
11 no. -- it was some girl named
12 that I had worked with at a restaurant. And I
13 recall Ghislaine giving me money to bring her over;
14 however, they never called her to come.

15 Q. And then I believe you mentioned that one
16 of your physical fitness instructors, you brought a
17 physical fitness instructor; was that correct?

18 A. Correct.

19 Q. And what did she do?

20 A. She gave him a -- like a training session,
21 twice.

22 Q. Twice.

23 Did anything sexual in nature happen
24 during the session?

25 A. At one point he lifted up her shirt and

1 exposed her bra, and she grabbed it and pulled it
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.

19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that
24 question.

25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected
8 you to perform sexual acts when you were massaging
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when
17 you were testifying earlier that Jeffrey told you a
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was
21 sleeping on the plane, and they were getting
22 ready to land. And he went and woke her up,
23 and she thought that meant he wanted a blow
24 job, so she started to unzip his pants, and he
25 said, No, no, no, you just have to be awake for

1 landing.

2 BY MS. McCAWLEY:

3 Q. Do you recall witnessing any sexual acts
4 on the plane?

5 A. No.

6 Q. Did Emmy ever talk to you about performing
7 sexual acts on the plane?

8 A. No.

9 Q. We looked earlier at the police report,
10 and I just want to clarify, you identified some
11 areas where there were discrepancies in that report.

12 And you can take another look at it if you
13 want, but other than the discrepancies you pointed
14 out, is that a recollection of what you remember
15 telling the detective?

16 A. Yes.

17 MS. MENNINGER: Objection, outside the
18 scope of cross.

19 BY MS. McCAWLEY:

20 Q. You mentioned that there was a time when
21 you noticed that Maxwell was around a little bit
22 less?

23 A. Uh-huh.

24 Q. And I believe you said that was during the
25 middle of the time you were with Jeffrey.

1 Do you remember approximately when that
2 was year-wise?

3 A. I don't. I would say it was probably
4 sometime between 2003 and 2004.

5 Q. And what made you think that?

6 A. I just saw her less and less at the house.

7 Q. Were you there more at the house during
8 that time period?

9 A. No, not necessarily. It's just at the
10 beginning, she was around a lot. And then I would
11 see her occasionally without him. The one time we
12 spent a few days together in 2006, she wasn't there
13 at all.

14 Q. So you saw her in the -- is it fair to say
15 that you saw her in the 2005 and 2006 time frame?

16 A. Yes.

17 Q. Then we were talking about the photography
18 earlier and about the photographs.

19 Did Maxwell ever ask you to take nude
20 photos of yourself for Jeffrey?

21 A. She asked me to take photos of myself for
22 Jeffrey, yes.

23 Q. And did you do that?

24 A. I did not.

25 Q. And the photos that were around that were

1 in the bathroom, that you mentioned a couple of
2 times places that there were photos of you, who took
3 those?

4 A. He did.

5 Q. And when we were talking about the Palm
6 Beach house and you were describing an area where
7 there were just a lot of photographs, is it fair to
8 say that there could have been nude photographs
9 amongst those photos that you saw?

10 A. Yes.

11 Q. And earlier you testified that you don't
12 have knowledge of what happens behind closed doors,
13 but you also said that Jeffrey had told you what
14 other girls did for him and that he wanted you to do
15 those things for him.

16 Is it fair to say that you knew that other
17 girls were performing sexual acts?

18 A. Yes.

19 MS. MENNINGER: Objection, foundation,
20 form.

21 BY MS. McCAWLEY:

22 Q. And I know you mentioned previously that
23 your relationship and the interaction with him
24 progressed over time.

25 Did there come a time when you were

1 expected to have sexual intercourse with Jeffrey?

2 A. Yes.

3 Q. And when was that?

4 A. 2005.

5 MS. McCAWLEY: That's it. I just do want
6 to also put on the record that we're
7 designating the testimony as confidential under
8 the protective order.

9 FURTHER EXAMINATION

10 BY MS. MENNINGER:

11 Q. Okay. You just testified that you have
12 knowledge -- you had knowledge that -- of what
13 Jeffrey was doing behind closed doors with other
14 girls. Was that your testimony?

15 A. Based on what he had told me.

16 Q. Okay. So Jeffrey told you things that he
17 had done with other girls?

18 A. Yes.

19 Q. You did not observe any of those things?

20 A. No.

21 Q. You did not talk to any of those girls
22 about what they had done with Jeffrey behind closed
23 doors?

24 MS. McCAWLEY: Objection.

25

1 BY MS. MENNINGER:

2 Q. Correct?

3 A. No. Correct.

4 Q. The only source of knowledge you have is
5 based on what Jeffrey told you he had done with
6 other girls?

7 A. Correct.

8 MS. McCAWLEY: Objection.

9 BY MS. MENNINGER:

10 Q. You said that there were possibly nude
11 photos amongst the other photos that you saw on
12 various walls at the Palm Beach house, correct?

13 A. Correct.

14 Q. None of them stood out to you?

15 A. Correct.

16 Q. None of them appeared pornographic?

17 A. No.

18 Q. You didn't see any fully frontally nude
19 photographs, correct?

20 A. No, not that I recall.

21 Q. And you don't recall seeing any girls that
22 appeared to be underaged, correct?

23 A. No.

24 Q. You said Ghislaine asked you to take
25 photos of yourself for Jeffrey, correct?

1 A. Correct.

2 Q. Did she ask you to take a nude photograph
3 of yourself or just a photograph of yourself?

4 A. A nude photograph of myself.

5 Q. What exactly did she say to you?

6 A. I don't remember exactly, but I know that
7 I never felt comfortable. I would have felt fine
8 taking photos of myself, my face, but I knew I was
9 never comfortable with it because I had to take
10 photos of my body. And I also didn't know how to
11 take a photo from standing behind. You have to have
12 someone else involved.

13 Q. That's my question. How would you take a
14 nude photograph of yourself?

15 A. Exactly. Someone else would have to do
16 it.

17 Q. Do you recall any of the particulars of
18 what she said to you that led you to believe she
19 wanted you to do that?

20 A. No, just asking for the photos.

21 Q. Do you know when in your time there?

22 A. It was near the beginning, because that's
23 when I was interested in the photography.

24 Q. Was it in the context of your discussion
25 of your photography class?

1 A. No.

2 Q. Was it in the context of anything?

3 A. About the camera that she had bought for
4 me.

5 Q. What did she say in relationship to the
6 camera that she bought for you and taking
7 photographs of you?

8 A. Just that Jeffrey would like to have some
9 photos of me, and she asked me to take photos of
10 myself.

11 Q. What did you say?

12 A. I don't remember saying no, but I never
13 ended up following through. I think I tried once.

14 Q. This was the pre-selfie era, correct?

15 A. Exactly.

16 Q. I want to go back to this: You testified
17 to two things just now with Sigrid that you said
18 were implied to you.

19 A. Okay.

20 Q. The first one was it would take pressure
21 off of Maxwell to have more girls around?

22 A. Right.

23 Q. What exactly did Maxwell say to you that
24 led you to believe that was her implication?

25 A. She said she doesn't have the time or

1 desire to please him as much as he needs, and that's
2 why there were other girls around.

3 Q. And did she refer specifically to any
4 other girls?

5 A. No.

6 Q. Did she talk about underaged girls?

7 A. No.

8 Q. Was she talking about massage therapists?

9 A. Not specifically.

10 Q. Okay. There were other girls in the house
11 that were not massage therapists, correct?

12 A. Yes.

13 Q. Nadia is another person that was around,
14 correct?

15 A. Yes.

16 Q. There were other people he traveled with?

17 A. Uh-huh.

18 MS. McCAWLEY: Objection.

19 BY MS. MENNINGER:

20 Q. Correct?

21 A. Correct.

22 Q. Other girls?

23 A. Yes.

24 Q. Adults?

25 A. Yes.

1 Q. When I say "girl," I really mean women,
2 correct?

3 A. Correct.

4 Q. There were other women around who hung out
5 with Jeffrey, and you don't know what they did
6 behind closed doors, correct?

7 A. Correct.

8 Q. So when you heard the implication that she
9 wanted other girls around to take the pressure off
10 of her sexually, in your mind that meant other adult
11 women that he had in his life, correct?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Correct, doing what I was
14 expected to do in a massage, you know.

15 BY MS. MENNINGER:

16 Q. Ghislaine didn't have anything to do with
17 you bringing this woman over for a physical workout
18 with Jeffrey, correct?

19 A. Correct.

20 Q. She asked you to bring another girl to
21 be -- to perform massages at the home?

22 A. Yes. Well, she was always asking if I
23 knew anyone else. And so I brought this one girl
24 that I didn't even know I worked with her at a
25 restaurant. So I didn't care what she thought of me

1 if anything happened. And so -- but it never turned
2 into anything.

3 Q. She was an adult?

4 A. She was an adult.

5 Q. Working at a restaurant with you?

6 A. Yes.

7 Q. What restaurant was that?

8 A. It's a restaurant that's closed. It's
9 called .

10 Q. You were asked about the famous people.
11 You said you met Michael [REDACTED]?

12 A. Yes.

13 Q. But you did not give him a massage?

14 A. No.

15 Q. There were other famous people, perhaps,
16 who were around Jeffrey's home that you didn't meet,
17 correct?

18 A. Correct.

19 Q. Do you know whether [REDACTED] has
20 told the truth about the age she was when she met
21 Ghislaine Maxwell?

22 MS. McCAWLEY: Objection. Exceeds the
23 scope of cross.

24 THE WITNESS: I don't have any idea what
25 she told them in terms of her age.

1 BY MS. MENNINGER:

2 Q. Do you know if [REDACTED] is telling
3 the truth about whether she spent her sweet 16th
4 birthday with Jeffrey and Ghislaine Maxwell?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: I don't know anything about
7 that.

8 BY MS. MENNINGER:

9 Q. Do you know whether [REDACTED] is
10 telling the truth about whether Ghislaine Maxwell
11 sexually assaulted her on her first day on the job?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: I have not knowledge of
14 that.

15 BY MS. MENNINGER:

16 Q. Do you have any knowledge of whether
17 [REDACTED] is telling the truth about
18 Virginia -- excuse me -- about Ghislaine Maxwell
19 forcing [REDACTED] to "go down" on her?

20 MS. McCAWLEY: Objection.

21 THE WITNESS: No knowledge.

22 BY MS. MENNINGER:

23 Q. Do you have any knowledge about whether
24 [REDACTED] is telling the truth about whether
25 Ghislaine Maxwell forced her to participate in

1 orgies with other women?

2 MS. McCAWLEY: Objection.

3 THE WITNESS: No.

4 BY MS. MENNINGER:

5 Q. Do you have any knowledge about whether
6 [REDACTED] is telling the truth about whether
7 Ghislaine Maxwell directed her to have sex with
8 Prince Andrew?

9 MS. McCAWLEY: Objection.

10 THE WITNESS: No. Only based on what I've
11 read in the media.

12 BY MS. MENNINGER:

13 Q. And Alan Dershowitz?

14 MS. McCAWLEY: Objection.

15 THE WITNESS: The same.

16 BY MS. MENNINGER:

17 Q. Prime ministers?

18 MS. McCAWLEY: Objection.

19 THE WITNESS: No.

20 BY MS. MENNINGER:

21 Q. Do you have any knowledge about whether
22 [REDACTED] is telling the truth about foreign
23 presidents?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: No knowledge.

1 BY MS. MENNINGER:

2 Q. Do you know whether [REDACTED] is
3 telling the truth about Ghislaine Maxwell forcing
4 her to participate in an orgy with Prince Andrew and
5 other underaged girls on the island?

6 MS. McCAWLEY: Objection.

7 THE WITNESS: No knowledge.

8 BY MS. MENNINGER:

9 Q. Did Ghislaine Maxwell ever ask you to have
10 her baby?

11 MS. McCAWLEY: Objection.

12 THE WITNESS: No.

13 MS. MENNINGER: No further questions.

14 MS. McCAWLEY: Thank you for your time.

15 THE WITNESS: We are done.

16 MS. McCAWLEY: We are off the record.

17 THE VIDEOGRAPHER: The time is 1:11. This
18 concludes the video deposition. Off the
19 record.

20 (Thereupon, the taking of the deposition
21 was concluded at 1:11 p.m.)
22
23
24
25

AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF)

I, _____, being first
duly sworn, do hereby acknowledge that I did
read a true and certified copy of my deposition
which was taken in the case of _____ V.
MAXWELL, taken on the 18th day of May, 2016,
and the corrections I desire to make are as
indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF)

Before me personally appeared

_____,
to me well known / known to me to be the
person described in and who executed the
foregoing instrument and acknowledged to and
before me that he executed the said instrument
in the capacity and for the purpose therein
expressed.

Witness my hand and official seal, this
_____ day of _____, ____.

(Notary Public)

My Commission Expires:

			ERRATA SHEET
	PAGE	LINE	REMARKS
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22			Signature of Witness
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24			(Notary Public)
25			Dated this _____ day of _____, _____.
			MY Commission Expires: _____

1 CERTIFICATE OF OATH
2 STATE OF FLORIDA)
3 COUNTY OF MIAMI-DADE)
4
5 I, the undersigned authority, certify
6 that [REDACTED] personally appeared before me
7 and was duly sworn.
8 WITNESS my hand and official seal this
9 18th day of May, 2016.
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12 KELLI ANN WILLIS, RPR, CRR
13 Notary Public, State of Florida
14 My Commission No. FF911443
15 Expires: 2/16/21
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C E R T I F I C A T E

STATE OF FLORIDA)

: ss

COUNTY OF MIAMI-DADE)

I, KELLI ANN WILLIS, a Registered
Professional, Certified Realtime Reporter and
Notary Public within and for The State of
Florida, do hereby certify:

That [REDACTED], the witness whose
deposition is hereinbefore set forth was duly
sworn by me and that such Deposition is a true
record of the testimony given by the witness.

I further certify that I am not related
to any of the parties to this action by blood
or marriage, and that I am in no way interested
in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 18th day of May, 2016.

KELLI ANN WILLIS, RPR, CRR































