EXHIBIT D

[redacted]

VS.

MAXWELL

Deposition

[redacted]

05/03/2016

Agren Blando Court Reporting & Video, Inc.
216 16th Street, Suite 600
Denver Colorado, 80202
303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
[redacted]
May 3, 2016

[redacted],

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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Also Present:
Brenda Rodriguez, Paralegal
Nicholas F. Borgia, CLVS Videographer

Pursuant to Notice and the Federal Rules of Civil Procedure, the VIDEOTAPED DEPOSITION OF [redacted], called by Defendant, was taken on Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150 East 10th Avenue, Denver, Colorado, before Kelly A. Mackereth, Certified Shorthand Reporter, Registered Professional Reporter, Certified Realtime Reporter and Notary Public within Colorado.

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PRODUCTION REQUEST(S):

(None.)

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P R O C E E D I N G S

THE VIDEOGRAPHER: We're on the record at 9 a.m. Today is May 3rd, 2016. This begins the videotaped deposition of [redacted] in the matter of [redacted] versus Ghislaine Maxwell.

We're located at 150 East 10th Street -- excuse me, 10th Ave., in Denver, Colorado.

Our court reporter is Kelly Mackereth. The videographer is Nicholas F. Borgia, CLVS.

Will counsel please introduce yourselves for the record.

MR. [redacted]: Sure. Brad [redacted] and Sigrid McCawley on behalf of the plaintiff, [redacted].

MS. MENNINGER: Laura Menninger and Jeffrey Pagliuca on behalf of the defendant, Ghislaine Maxwell.

THE VIDEOGRAPHER: And will our court reporter please swear in the deponent.

[redacted],

being first duly sworn in the above cause, was examined and testified as follows:

MR. [redacted]: Just before we get started,

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I just wanted to make sure that we're clear, and I think that we are, that this deposition in total will be treated as confidential until such time as we are able to review and de-designate.

[redacted]. MENNINGER: Yes.

MR. [redacted]: Okay.

EXAMINATION

BY [redacted]

Q Good morning, [redacted].

A Good morning, Laura.

Q Can you please state your full name?

A [redacted].

Q And where do you live right now, [redacted]?

A [redacted].

Q All right. And who lives with you there?

A My son, my other son, my daughter, my husband and my in-laws.

Q And when did you return to the U.S. for this visit?

A I believe it was around Thursday, the 29th, I think.

Q Okay. And who traveled with you?

A Myself.

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Q Yourself?
A Yes.
Q Are you able to travel freely between the U.S. and Australia?
A Yes.
Q Are you married?
A Yes.
Q To whom?
A Robert [redacted].
Q All right. And did Mr. [redacted] travel with you back to the U.S.?
A No.
Q All right. Have you taken any medications in the last 24 hours?
A I have taken -- I have a cold, but I have taken non-drowsy cold tablets and some DayQuil.
Q All right. Anything else?
A No.
Q All right. And what is your current profession, [redacted]?
A I'm a housewife.
Q All right. And how long have you been a housewife?
A For the last ten years, since I've had kids.

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Q All right. And what was your profession in 2014?
A A housewife.
Q All right. Any other profession?
A No.
Q All right. You understand that you're under oath today?
A Yes.
Q And you understand that if you don't understand a question, you need to let me know that.
A Okay.
Q And ask for clarification.
A Um-hum.
Q Do you understand?
A Yes.
Q You also understand, I'm assuming, that you have to say yes or no in answer to a question, or you have to make a verbal response and not just shake your head or something --
A Yes.
Q -- so the court reporter can get it.
You have -- you have been deposed before, correct?
A Yes.
Q Do you understand what it means to be under oath?
A Yes.
Q What does it mean to you?
A To tell the truth, the whole truth and nothing but the truth.
Q All right. And what does the word truth mean to you?
A To be honest.
Q Is there more than one truth?
A Is there more than -- no, there's no more than one truth.
Q If you are confused by a question, you need to let me know that so I can clarify the question, okay?
A Okay.
Q For example, if I asked you the question were you sexually trafficked to foreign presidents, do you understand what that question means?
A Yes.
Q What does it mean?
A Was I lent out for the purposes of sex to a foreign person -- president.
Q All right. And what is the answer to that question?
A Yes.

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Q And if I ask you have you met any foreign presidents, do you understand what that question means?
A Yes.
Q And what is the answer to that question?
A Yes.
Q All right. And if I asked you which foreign presidents have you met, do you understand what that question means?
A Yes.
Q What is the answer to that question?
A What is the name of the person?
Q Yes. Who are the foreign presidents that you have met?
A I honestly can't remember his name at this time. I'm a very visual person so --
Q All right. Can you describe him, then?
A Yes. He's Spanish.
Q Okay.
A Tall, dark hair.
Q All right. Anything else?
A And he's got a foreign tongue, accent.
Q And what age, approximately?
A Was I or was he?
Q Was he.

A I'd say in his 40s.
Q Okay. And where did you meet him?
A I believe it was New Mexico.
Q New Mexico?
A Possibly New Mexico. I'm sorry. It's really hard to go back and remember lots of different events with lots of different people.
Q Okay. And is that the only foreign president that you have met?
A I've met a lot of very high, powerful people and I wasn't just introduced to them as who they were. It's only going back through photos in time to be able to realize who they are and what they are now. So it's hard for me to distinguish who I've actually met and when and where I've met them.
Q So to your knowledge, you have only met one foreign president?
A To my knowledge at this time, yes.
Q And is there anything that might change your knowledge at a different time?
A If I were to see more photos of other people. I mean, I've been able to distinguish the majority of the people I've been lent out to, but who's to say there's not more.
Q All right. If I were to ask you the question how many times have you had sex with Tom Pritzker, do you know what that question means?
A I believe so.
Q All right. And what is the answer to that question?
A I believe I was with Tom once.
Q Okay. I would like to ask you about your prior sworn statement.
You understand you're under oath today, correct?
A Yes.
Q All right. You've previously made statements under oath, correct?
A Yes.
Q And you've previously authorized pleadings to be filed on your behalf, correct?
A Yes.
Q By various attorneys, right?
A Yes.
Q All right. You have included in your sworn statement allegations about my client, Ghislaine Maxwell, correct?
A Yes.
Q And did you review any of those prior sworn statements before appearing here today?

A Yes.
Q And which ones did you review?
A I'd have to see which ones you're specifically talking about. There's quite a lot of statements I've made.
Q Right. And which ones do you recall having reviewed before you attended this deposition today?
A I've reviewed my affidavit. I'm not a lawyer so I really don't know legal terms to half of the, you know, legal jargon of statements, which they are. If you showed me, I'd be able to tell you if I've seen it or not.
Q Okay. So to your knowledge, can you identify any sworn statement you reviewed before attending the deposition today?
A Could I name what the statement is?
Q Right.
A The actual piece of paper that has the title at the top?
Q Right.
A No, I don't.
Q Can you describe it in any other fashion?
A I don't understand. I'm sorry.
Q That's all right. You have to tell me if you don't.
Do you have any reason to believe that any of your previous sworn statements that you have made are not true?
A No.
MR. [redacted]: I just object and ask that if we're going to ask the witness questions about any of her statements in whole or in part that the witness be allowed to see the statement, review the statement and then answer your questions.
Q (BY [redacted] answer the question.
A Can you reask the question? I'm sorry.
Q Do you have any reason to believe that any of your prior sworn statements are untrue?
A I have no reason to believe that my prior statements are untrue.
Q Has anyone told you to say something that was not true in connection with this case?
A No, [redacted].
Q All right. I'd like to start with a lawsuit that you filed under the caption Jane Doe versus Jeffrey Epstein.
Do you recall that lawsuit?
A I believe so.

(Exhibit 1 marked.)

Q (BY MS. MENNINGER) I'm going to show you an exhibit that we are marking as Defendant's Exhibit 1.

MR. [redacted]: Can I see that for a second?

I'd just like to make an objection on the record for the misidentification of this document.

While there was a lawsuit filed under the style of Jane Doe versus Jeffrey Epstein, Jane Doe was not [redacted]. And the lawsuit that's now being handed to this witness is Jane Doe 102 versus Jeffrey Epstein.

Is that the document we're talking about?

MS. MENNINGER: Counsel, if you have an objection, you should state the basis for your objection in a non-leading, non-suggestive manner.

If you have any other record to make, you can do so in a pleading filed with the Court.

MR. [redacted]: Sure. My objection is you've misrepresented what you've handed the witness. I want to make sure that the witness is holding what you actually want her to be holding as opposed to the lawsuit you said that you were going to hand her.

That's it.

MS. MENNINGER: Counsel, I will ask the

witness questions about the document. I did not ask you any questions about the document.

Q (BY [redacted], could you please take a look at what we have marked as Defendant's Exhibit 1.

Do you recognize that document, [redacted]?

A I believe so. Yes. Yes, I do.

Q And do you see that the counsel on the last page -- I'm sorry, not the last page, but the third from the last page are Mr. Josefsberg and Ms. Ezell from Podhurst Orseck?

A Yes.

Q Were those your lawyers?

A Yes, they were.

Q And did you authorize them to file Jane Doe 102 versus Epstein on your behalf?

A Yes, I did.

Q And is that this complaint that's been marked as Defendant's Exhibit 1?

A I believe so.

Q In that document, if I could ask you to turn to page -- well, I'll turn to page 9 and paragraph 23.

A Would you like me to read it?

Q No. I'm just -- did you find it?

A I can see paragraph 23.

Q Okay. And do you see that there are allegations about a Ms. Maxwell contained in that complaint?

A Yes, I do.

Q All right. And do you understand that to be Ghislaine Maxwell, my client?

A Yes.

Q All right. And Ms. Maxwell was not sued as a part of this case, correct?

MR. [redacted]: Object to the form.

THE DEPONENT: Does that mean I can answer?

MR. [redacted]: Sure, you can answer.

MS. MENNINGER: Right.

MR. [redacted]: If you understand the question, answer it.

A Yes, Ms. Maxwell -- sorry, repeat the question.

Q (BY MS. MENNINGER) Was Ms. Maxwell sued in this --

A No, she wasn't.

Q -- in the case that's represented by Defendant's Exhibit 1?

A No, she wasn't. I'm sorry for interrupting you. But no, she was not sued at this time, no.

Q And why not?

MR. [redacted]: I'd object and ask the witness not answer that question because that would be privileged, attorney-client privileged, information that was between [redacted] and the Podhurst Orseck firm at that time.

So I'm instructing you not to answer.

Q (BY MS. MENNINGER) All right. [redacted], did you make a decision yourself whether or not to sue Ms. Maxwell as a part of this lawsuit against -- Jane Doe 102 versus Jeffrey Epstein?

A I think I've been advised not to answer that question.

Q This is a different question.

A [redacted], okay.

Q So your counsel can assert a privilege, but that question did not call for privileged information.

MR. [redacted]: I --

Q (BY MS. MENNINGER) I'm asking about what -- what you decided to do. Whether you decided to sue Ms. Maxwell or not at the time Jane Doe 102

versus Epstein was filed?

MR. [redacted]: And I disagree. And I object to this invading the attorney-client privilege.

And I'm instructing you not to answer.

Q (BY MS. MENNINGER) Can you answer that question without revealing any attorney-client communications, whether you made a decision to file a lawsuit or not?

A I'm going to have to listen to my attorney and not answer the question.

Q All right. I would like to show you some documents that were filed in what we'll call the CVRA case, the Crime Victims' Rights Act case.

Do you know what I mean by that reference?

A I am familiar with that.

Q Okay. I'm going to start with one on or about December 30th, 2014. We will mark it as Defendant's Exhibit 2.

(Exhibit 2 marked.)

MR. [redacted]: Thank you.

Q (BY MS. MENNINGER) All right. [redacted], do you recognize Defendant's Exhibit 2?

A Yes.

Q And what do you understand it to be?

A I believe this is when I was hoping to join the CVRA case.

Q All right. And do you know when this document was filed?

And actually, just to be clear, about halfway there's actually a second document that was filed. So this is a composite exhibit. Let me be very clear.

So after page 14 -- I'm sorry, 13, there's a second document that is styled Jane Doe #3 and Jane Doe #4's Corrected Motion Pursuant to Rule 21 for Joinder In Action.

Do you see that?

A Did you say page 14?

Q It is on the 14th page of this document.

Do you see that?

A I do.

Q And so this composite Exhibit 2 has both a motion and a corrected motion.

Do you see that?

A Yes.

Q And were both of those pleadings authorized by you to be filed?

A Yes.

Q In other words, you wanted to join the

CVRA action in or about December 30th, 2014, correct?

A I -- I'm not aware of the exact dates. There's no dates on this. But I did try to join the motion, yes.

Q All right. If you can look at the top line of the document.

A Yes.

Q Does it say, Entered on FLSD --

A [redacted], it does, too, I'm sorry, yes.

Q That's all right. So does that refresh your memory as to about when you first sought to join the CVRA action?

A Yes.

Q December 30th, 2014, correct?

A Yes.

Q And the corrected motion was filed a few days later, correct?

A Yes, correct.

Q If I could turn to Defendant's Exhibit 3, which was January 21st.

(Exhibit 3 marked.)

MR. [redacted]: Thank you.

Q (BY MS. MENNINGER) Do you recognize this document?

A Yes, I do.

Q What do you understand this document to be?

A It's a rough background of the years that I was abused by Ghislaine and Jeffrey.

Q All right. And this is something I believe that you on page 15 signed; is that true?

A Just let me have a look.

Q Sure.

A I think I'm actually missing page 15. [redacted], here we go.

Q Sorry. I'm looking at the numbers on the top right. I apologize. I believe there was some cover page or something that was excluded.

MR. [redacted]: And just for the record, I'm going to object to the relevance of this document. I'm going to allow the witness to answer the question, but I want my objection on the record.

MS. MENNINGER: Okay. Simple objection, relevance.

A Are we talking about this page?

Q (BY MS. MENNINGER) Yes, the one with the black box, yes. Do you believe that to have contained your signature?

A Yes.

Q All right. And you executed that on

January 19th, 2015?

A At the very top of the page it says January 21st, 2015.

Q The date it was filed. Is there a date just above the signature block?

A [redacted], yes, sorry. Yes, there is.

Q And what date -- what date was that?

A The 19th day of January, 2015.

Q Okay. And this document is something that you believe contains the truth, correct?

A To the best of my knowledge at the time, yes.

Q All right. Did something change between the time then and today that makes you believe that it's not all accurate?

A Well, as you can see, in line 4 on page 1, I wasn't aware of my dates. I was just doing the best to guesstimate when I actually met them.

Since then I've been able to find out that through my Mar-a-Lago records that it was actually the summer of 2000, not the summer of 1999.

Q [redacted], I'm sorry. Are you back on page 1?

A On the first page.

Q Okay.

A Yes.

Q And you're talking about line 4?

A Line 4.

Q Paragraph 4 or line 4?

A [redacted], sorry. Number 4, the paragraph number 4.

Q Okay. And what part of paragraph 4 do you now believe to be untrue?

A In approximately --

MR. [redacted]: Object to the form.

You can answer.

A In approximately 1999 when I was 15 years old I met Ghislaine Maxwell.

Q (BY MS. MENNINGER) Okay.

A I now know that it was 2000, that I was 16 years old when I met Ghislaine Maxwell.

Q So when you signed this document under penalty of perjury stating that it was true, you no longer believe that to be true, correct?

A It was an honest mistake. We had no idea how to pinpoint without any kind of records or dates or anything like that. I was just going back chronologically through time. And that's the best time that I thought it was. And now I know the facts, so it's good to know.

Q So you now believe that a document you

filed under oath is no longer true, correct?

MR. [redacted]: Object to the form.

A I wouldn't say that it wasn't true. I was just unaware of the times and the dates.

Q (BY MS. MENNINGER) Again, is there more than one truth, [redacted]?

A No, there's no more than one truth.

Q All right. So a document in which you swore that you were 15 years old when you met Ms. Ghislaine Maxwell is an untrue statement, correct?

MR. [redacted]: Object to the form.

A It's not that it's an untrue statement. It was a mistake. So it wasn't intentionally trying to say something that wasn't true. It was to my best knowledge that I thought it was 1999. And when I got my records from Mar-a-Lago I was able to find out that it was 2000. And this was entered before I found out the actual dates that I did work at Mar-a-Lago.

Q (BY MS. MENNINGER) Okay. So a document that you filed under oath --

A Um-hum.

Q -- is now, you believe to be untrue, correct?

MR. [redacted]: Objection. Asked and answered.

Q (BY [redacted] answer.

MR. [redacted]: Answer again.

A Again, I wouldn't say it's untrue. Untrue would mean that I would have lied. And I didn't lie. This was my best knowledge at the time. And I did my very best to try to pinpoint time periods going back such a long time ago.

It wasn't until I found the facts that I worked at Mar-a-Lago in 2000 that I was able to figure that out.

Q (BY MS. MENNINGER) And approximately when did you learn those facts about the dates you worked at Mar-a-Lago?

A I would say it was mid-2015.

Q Mid-2015 is the first time you became aware of the dates --

A I don't know the exact --

Q If you could just let me finish.

A I'm sorry.

Q That's all right. Approximately mid-2015 when you learned the true dates that you had worked at Mar-a-Lago?

A That's correct. Sorry.

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Q And based on the fact that you learned the fact you had worked at Mar-a-Lago in 2000 -- you became aware in mid-2015 --

A Um-hum.

Q -- that you had met Ms. Maxwell in 2000, correct?

A That's --

MR. [redacted]: Object to the form.

A That's correct.

Q (BY MS. MENNINGER) All right. And you became aware in mid-2015 that you were not 15 years old when you met Ghislaine Maxwell, correct?

MR. [redacted]: Object to the form.

A That's correct.

Q (BY MS. MENNINGER) Okay. And who provided you those Mar-a-Lago records in approximately mid-2015?

MR. [redacted]: I'm going to object.

And to the extent that this invades the attorney-client privilege, if it was your attorneys that you spoke to and learned this information or received this information from, then you're instructed not to answer.

A I cannot answer that question.

Q (BY MS. MENNINGER) Did you yourself look

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at records in the middle of 2015 regardless of who showed them to you?

MR. [redacted]: Objection. And to the extent that they were showed to you or shared by any of your lawyers, you're instructed not to answer the question. It invades the attorney-client privilege.

Q (BY MS. MENNINGER) Did you look at Mar-a-Lago records in the middle of 2015 yourself?

MR. [redacted]: She's not answering the question.

MS. MENNINGER: On what grounds is she not answering the question?

MR. [redacted]: I just told you it invades the attorney-client privilege. If she learned --

I will instruct her if she learned by some other way than her attorneys sharing the information with her, then she can answer the question.

Q (BY MS. MENNINGER) I'm asking you not to tell me whether your attorneys showed you the record. I'm asking you not to tell me the source of the record.

I'm asking you if you personally in the middle of 2015 looked at Mar-a-Lago records?

MR. [redacted]: Same objection.

Same instruction.

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Q (BY MS. MENNINGER) I'm going to show you an exhibit filed on, I believe on or about February 6th of 2015. Defendant's Exhibit 4.

(Exhibit 4 marked.)

MR. [redacted]: Thank you.

Q (BY MS. MENNINGER) And drawing your attention to the heading line that says, Entered on the docket February 6th, 2015.

Do you see that?

A Yes.

Q All right. And Declaration of Jane Doe 3, do you see that on the first page?

A Yes.

Q And it's in the CVRA case, correct, Jane Doe 1 and Jane Doe 2 versus United States of America?

A Yes.

Q All right. And do you recognize this document?

A Yes.

Q And what do you understand this document to be?

A I believe it's more reason to why I should have been added to the CVRA case.

MR. [redacted]: Objection to the relevance, Counsel.

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Q (BY MS. MENNINGER) Okay. And again, if you look to the last page of the document, paragraph 67 --

A The last page?

Q Yes, the very last.

A 67, yes.

Q All right. It says in paragraph 67: I declare under penalty of perjury that the foregoing is true and correct, right?

A Yes.

Q And it was executed on or about the 5th day of February, 2015, correct?

A It's a bit smudged, but it kind of looks like a 5.

Q All right. And then there's a signature block that's redacted that says Jane Doe 3, correct?

A Correct.

Q Do you believe that you signed this document and it was later covered up by that block?

A Yes.

Q All right. And again, is there anything in this document that you believe today to not be true?

MR. [redacted]: I just ask that you read through the entire document and answer the question.

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Q (BY MS. MENNINGER) Have you seen this document before, [redacted]?
A I'm sure I have, but it's always good to refresh your memory just looking over something.
Q All right.
(Pause.)
A Thank you for giving me time to read that over.
Q Certainly. So have you had a chance to read it now?
A Yes.
Q All right. And what parts of this document sworn by you under penalty of perjury are not true?
A Again, the only thing that I see is the mistake that I made, I first met Epstein when I was 15 years old.
Q Okay. And that's in paragraph 5?
A That's in paragraph 5 on the first page.
Q All right. And everything else you believe to be true?
A Yes.
Q Okay. If I could now turn to what I'll mark as Defendant's Exhibit 5.
(Exhibit 5 marked.)

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THE DEPONENT: Thank you.
MR. [redacted]: Thank you.
MS. MENNINGER: I think I have one more.
MS. McCAWLEY: It's okay if you don't.
MS. MENNINGER: I don't think I have all of them.
Q (BY MS. MENNINGER) All right. Do you recognize Defendant's Exhibit 5?
A Yes.
Q What is the title of that document?
A Declaration of [redacted].
Q And that's you, correct?
A Yes.
Q And do you recognize which case this declaration was filed in?
A Yes. [redacted] [redacted] and Paul Cassell, Plaintiff versus Alan Dershowitz, Defendant.
Q All right. And who do you understand Mr. [redacted] and Mr. Cassell to be?
A Mr. [redacted] is my lawyer sitting next to me.
Q All right.
A And Mr. Cassell is another one of my lawyers.
Q All right. And they are in a lawsuit

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against Mr. Dershowitz; is that your understanding?
It's your understanding. You don't have to look at your lawyer if you don't understand. You don't have to --
A No, I just don't know if I'm allowed --
Q That's all right.
A -- to say certain things about that. But, yes, I believe they were in a lawsuit.
Q Okay. And that's against Mr. Dershowitz, right?
A Correct.
MR. [redacted]: Object to the form. I object to the relevance of the document.
Q (BY MS. MENNINGER) All right. [redacted], again, if you could turn to the last page of this document. And do you see a signature on that page?
A I do.
Q Whose signature is that?
A That is mine.
Q And approximately when did you sign that document?
A Executed this 20th day of November, 2015.
Q All right. So you signed that on November 20th, 2015, correct?

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A Correct.
Q All right. And that was under penalty of perjury, correct?
A Correct.
Q All right. If I could now turn to what we'll mark as Defendant's Exhibit 6.
(Exhibit 6 marked.)
MR. [redacted]: Thank you.
MS. McCAWLEY: Thanks.
Q (BY MS. MENNINGER) Do you recognize this document, [redacted]?
A I do.
Q All right. What do you believe this document to be?
A I believe this is when I spoke to the FBI.
Q Okay. And do you remember about when you spoke to the FBI?
A It says, Date of entry July 5th, 2013.
Q Do you believe that you spoke to the FBI in 2013?
A I thought it was 2011 when I talked to them.
Q Okay. I'm going to direct your attention to the bottom of that page.
A Yes.

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Q The first page. Do you see that?
A Yes.
Q The last few lines there have another date.
A [redacted], yes, investigation of, yes.
Q All right.
A So that makes sense, okay.
Q Okay. What do you understand that to be? And if it refreshes your recollection about when you spoke to the FBI, just let us know.
A Yeah, March 17th, 2011 sounds more right than 2013.
Q Okay. And where did you speak to them?
A I believe this was in the office of the consulate, American Consulate, in Sydney.
Q Sydney, Australia?
A Sydney, Australia.
Q Okay. And you were there in person with these FBI agents?
A Correct.
Q And were they taking notes when they spoke to you?
A Yes.
Q Were they recording the interview, to your knowledge?

A I believe they were.
Q Okay. Have you had a chance to review this report?
And I will make note for the record that there are obviously many places that are blacked out --
A Yeah.
Q -- or whited out. Is that fair?
A Yes.
Q All right. Have you had a chance to review this one with whited-out portions of it before today?
A Yes.
Q All right. And you understood when you were speaking to the FBI that they were federal agents, correct?
A Yes.
Q And that you were supposed to tell them the truth, correct?
A Absolutely.
Q And do you believe that you did, in fact, tell them the truth?
A To the best of my knowledge. Again, when it comes to dates and times, I was obviously off. But everything else is absolutely 100 percent true.

Q Okay. And have you reviewed any -- have you at any time reviewed this document without those portions whited out?
A I don't believe I've seen this document without the portions.
Q Okay. So you don't know, for example, what's behind those, other than what you recall --
A No.
Q -- having told the FBI at the time, correct?
A That's correct.
Q Okay. I'm going to show you a new document.
A Okay.
Q You can just put that to the side. Defendant's Exhibit 7.
(Exhibit 7 marked.)
Q (BY MS. MENNINGER) All right.
MR. [redacted]: Thanks.
Q (BY MS. MENNINGER) And do you recognize this document?
A Yes.
Q And what do you understand it to be?
A This was a phone conversation that I had between Jack Scarola and Brad [redacted].

Q Okay. And do you see a date reflected on the front page?
A April 7, 2011.
Q Is that when you had that phone conversation with them?
A If it's dated like that, it must be, yes.
Q Well, I just need you to say from your memory, does that sound about right in terms of what you recall having been the phone conversation?
A I'm sure it's correct.
Q Okay.
A I don't have a good calendar in my brain. So, yes, I'm sure that that's the correct date.
Q Did you understand it was being recorded, correct?
A Yes.
Q Okay. Have you listened to the recording of that phone call?
A I don't believe I listened to the recording, but I have seen the document.
Q All right. And again, you were speaking the truth at the time you were speaking to them as lawyers and officers of the court, correct?
A Yes. And again, to the best of my knowledge when it comes to dates.

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Q Okay. And then the last -- the last document, I hope, is --

MS. MENNINGER: The big one.

(Exhibit 8 marked.)

Q (BY MS. MENNINGER) All right. Do you recognize -- I'm going to -- I'm sorry, if I didn't say it already. This is Defendant's Exhibit 8.

Do you recognize this document?

A Yes, I do.

Q And what is this document?

A This is a manuscript that I was writing, I believe, back in 2011 regarding some of my life story. And just to make it known, this is a based on true events. But I wouldn't say fictional, but just based on true events.

Not everything in it is -- not everything is in there and not everything is, you know, correct. So there's a few mistakes in there.

Q Okay. Off the top of your head, do you recall any mistakes that are in there now without reading the 140-page document?

MR. [redacted]: We're going to be here a long time.

A Yeah, we could be here a very long time. I mean, I'd like to say a majority of it is correct.

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Some names have been changed in order to protect other people.

Q (BY MS. MENNINGER) Protect their privacy?

A Protect their privacy, yeah, I would say, just not getting them involved in, if this were to ever go public.

Q Well, again, without rereading the whole manuscript --

A Reading it, yeah. I'm trying to see if I can -- see something in here.

Q Let me narrow my question and maybe that will help.

A Yes.

Q Is there anything -- well, first of all, did you author that entire manuscript?

A Yes, I did.

Q Did anyone else author part of that manuscript?

A Do you mean did anyone else write this with me?

Q Right.

A No.

Q That's all your writing?

A This is my writing.

Q Okay. To the best of your recollection,

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as you sit here right now, is there anything in that manuscript about Ghislaine Maxwell that is untrue?

A I don't believe so. Like I said, there is a lot of stuff that I actually have left out of here.

Q Um-hum.

A So there is a lot more information I could put in there. But as far as Ghislaine Maxwell goes, I would like to say that there is 99.9 percent of it would be to the correct knowledge.

Q All right. Is there anything that you -- and I understand you're doing this from memory. Is there anything that you recall, as you're sitting here today, about Ghislaine Maxwell that is contained in that manuscript, that is not true?

A You know, I haven't read this in a very long time. I don't believe that there's anything in here about Ghislaine Maxwell that is not true.

MR. [redacted]: I'd just ask, Counsel, if you have anything specific to show her about Ghislaine Maxwell --

MS. MENNINGER: I'll ask questions.

MR. [redacted]: -- I'll have her look at it.

MS. MENNINGER: I'll ask questions.

MR. [redacted]: I know, but I want the record clear that if she hasn't read it in a long

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time, she --

MS. MENNINGER: She made the record very clear. Thank you. She doesn't need you to make a record.

MR. [redacted]: I'm not making records, but you're making this last longer. There's no need for this. This doesn't have to be an unpleasant process. I want her to help you.

MS. MENNINGER: I don't find it unpleasant. I'm sorry if you do.

MR. [redacted]: Okay. Well, then, I object to that last series of questions to the extent that she was unable to look at what you wanted her to look at.

Q (BY MS. MENNINGER) I would like to next turn to a document filed on March 16th of this year. Or actually, let me rephrase that. A document dated March 16th of this year, which we will mark as Defendant's Exhibit 9.

(Exhibit 9 marked.)

Q (BY MS. MENNINGER) Do you recognize this document, [redacted]?

A Yes, I do.

Q All right. And what is your understanding of what this document represents?

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A Based upon the title, it is Plaintiff's Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff.

Q And are you the plaintiff?

A I am the plaintiff, yes.

Q All right. So it's your response to Ms. Maxwell's discovery request, correct?

A Correct.

Q All right. And if you look at the last page -- or, I'm sorry, it would be the second to last page -- you might see signatures of your attorney, correct?

A I see printed names.

Q Printed. Electronic signature --

A Okay.

Q -- will have a little S in front of it.

A All right.

Q Do you see that?

A I can see the, yeah the printed names. So if it's electronic signature, then yes.

Q All right. And the date on that is March 16th of 2016?

A Correct.

Q All right. And so without revealing the content of your conversations, you assisted in

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preparing responses to discovery requests, correct?

A Yes.

Q All right. I'm going to show you a subsequent one marked Defendant's Exhibit 10 and dated March 22nd.

(Exhibit 10 marked.)

Q (BY MS. MENNINGER) If you can take a look at that.

A Thank you.

Q And while we're at it, I'm going to give you Defendant's Exhibit 11 so you can look at them together.

(Exhibit 11 marked.)

Q (BY MS. MENNINGER) All right.

A Thank you.

Q All right. So looking at Defendant's Exhibit 10, do you recognize that document?

A Plaintiff's Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff.

I've seen a lot of documents, and they all look the same. But I'm sure I've seen it.

Q All right. And looking, again, at the last page -- or I'm sorry, this time it will be the third to last page.

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Do you see your attorney's signature and the date, March 22nd, 2016, correct?

A I do.

Q All right. And then looking at Defendant's Exhibit 11, that's your declaration, correct?

A Yes, it is.

Q And declaring under penalty of perjury as of March 22nd, 2016 that the supplemental response and objections are true and correct, right?

A Correct.

Q And you -- that's your signature?

A That is mine.

Q And you are swearing under penalty of perjury that Defendant's Exhibit 10 is true and correct?

A Yes.

Q As of March 22nd, 2016, right?

A Yes.

Q All right. And then one more on that. Defendant's Exhibit 12.

(Exhibit 12 marked.)

Q (BY MS. MENNINGER) And do you recognize this document?

A Yes.

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Q Okay. And what is this document?

A Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff.

Q All right. And again, turning to the very rear section, I think you'll see your attorney's signatures again and the date of April 29th, 2016?

A I do see that.

Q All right. And again, you authorized this document to be filed, correct?

A Correct.

Q And the statements contained therein are true, to the best of your knowledge, correct?

A Correct.

Q And that's -- April 29th is just a few days ago, correct?

A Yes.

Q All right. Did you review this April 29th document before it was filed or served?

A Like I said, I've seen a lot of documents and they all look alike, but I'm sure I've seen this one.

Q Okay. And if it's something that was served last Friday, does that refresh your recollection that you reviewed it before it was

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served on April 29th, 2016?

A I believe I have seen this.

Q And you were here in the U.S. last Friday?

A Yes.

Q So you saw it in person, correct?

A Yes, I was looking at a lot of documents on Friday.

Q Okay.

A I believe this could definitely be one I looked at.

Q All right. If I could direct your attention to -- let me see, in that document --

MR. [redacted]. MENNINGER: Um-hum, Defendant's Exhibit 12.

Q (BY MS. MENNINGER) -- to page -- sorry. You're not the only one who's seen a lot of documents.

Well, without asking you to look at a page, can you tell me what your -- between 1996 and -- well, in 1996 to 2002, what was the first job that you held?

A I believe the first job that I held was in the year 2000, and that was at Mar-a-Lago.

Q Okay. And is that the first job you held

as a teenager or at any point in time, that you recall?

A Yes, that I recall.

Q All right. Did you ever work at Taco Bell?

A My ex-boyfriend used to work there and I would help him out. I was never really -- I don't think I was employed there. He was my boyfriend so I stayed there with him all the time.

Q What was his name?

A I called him Michael, but I think his real name was James.

Q Okay. And so he was employed there, but you were not employed there?

A I used to go there and help him out.

Q Did you have a uniform?

A I would have to wear a shirt when I was there, yes. He was the manager, so --

Q [redacted], a Taco Bell shirt?

A Yes.

Q Okay. And did you get a paycheck from them?

A I believe Michael paid me.

Q How did he pay you?

A With a check.

Q Written from Taco Bell?

A You know, I don't know, sorry. I just -- I remember he asked me to come in and help him out, and that's -- I didn't really consider myself an employee there, but --

Q Just wearing the shirt and getting a paycheck didn't cause you to think you were an employee?

A Well --

MR. [redacted]: Object to the form. Mischaracterizes her testimony.

A Yeah, I know. I mean, it was my boyfriend. I was helping him out. So that's the way I looked at it.

Q (BY MS. MENNINGER) Is there any other place that you wore a uniform and got a check from in the years from '96 to 2000?

A I did work at Publix as a bag girl, but that was only for a couple weeks, I think.

Q Which Publix was that?

A I believe it was in Loxahatchee.

Q Okay. Do you remember the street?

A No.

Q All right. Anywhere else you wore a uniform and got a paycheck?

A I volunteered at a bird aviary.

Q What was the name of that?

A I don't know the name of it. But it was -- I'm an animal lover. So --

Q Okay.

A -- it's something I enjoyed doing.

Q Okay. Did you get a check from them?

A I volunteered. I think they eventually put me on some kind of payroll. I don't think it was much, though.

Q Okay. So what year were you in helping out in a Taco Bell wearing the uniform and getting a check?

A I have no idea when it comes to years.

Q Was it before or after Mar-a-Lago?

A Before Mar-a-Lago.

Q Okay. And how --

A Mar-a-Lago was my first real job so --

Q What's that?

A Mar-a-Lago was like my first real job.

Q What do you mean by real job?

A Like, you know, fully employed, sit down for an interview and, you know.

Q Okay. So Taco Bell, was Taco Bell the first place you got a paycheck from?

MR. [redacted]: Object to the form.
A Uhm, I don't know, to be honest.
Q (BY MS. MENNINGER) And in what order did Taco Bell, Publix and Mar-a-Lago go, and the aviary, sorry?
A [redacted], I would have to guess. Do you want me to guess?
Q Sure.
A Um, I would say Publix. And then, I think that's when I helped my boyfriend out at Taco Bell and then I think the aviary.
Q And where was the Taco Bell?
A I was living in Fort Lauder -- I think it was Fort Lauderdale. Don't quote me on that, but somewhere in Florida, Broward County, something like that.
Q And who were you living with at that time?
A Michael. His name is James, but Michael.
Q So you were living with Michael when you worked at the Taco Bell, right?
A Yes, I was living with him.
Q And you worked with Michael when you worked at the Publix, correct?
A No.
Q Okay. So Publix came after Taco Bell or

before?
A I think it came -- like I said, don't quote me on it, but I think Publix came before it.
Q And who were you living with when you worked at Publix?
A My mom and my dad.
Q And who were you living with when you worked at the aviary?
A My mom and my dad.
Q Anywhere else that you got a paycheck from before 2000?
A No, not that I can think of.
Q Okay. Anywhere else you wore a uniform?
A Besides Mar-a-Lago and -- yeah, that's it.
Q Okay. And so how long was it between working at any of those three places and the time that you worked at Mar-a-Lago?
A I have no idea. I'm sorry. Um --
Q Years? Months?
A [redacted], we're going to go back chronologically. I was trying to get my GED and I -- there was a summer break. And that's when I started working for Mar-a-Lago. So that Mar-a-Lago we know now is in the year 2000. So I would have to say a month.

Q Months. And what was the job you believe you had immediately prior to Mar-a-Lago?
A If I were correct, it would be the aviary that I volunteered at.
Q Okay. And you believe you were living with your parents at the time you worked at the aviary?
A Yes.
Q Okay. And not living with Michael?
A Michael might have been living with me and my parents.
Q Okay. So you recall Michael was living with you and your parents at the time you worked at the aviary?
A Yes.
MS. McCAWLEY: Objection. Mischaracterizes testimony.
Q (BY MS. MENNINGER) And was Michael living with you and your parents at the time you started at Mar-a-Lago?
A Yes.
Q And what address was Michael living with you and your parents at the time you started at Mar-a-Lago?
A My parents' address?

Q Whatever address you were living at, at the time you started at Mar-a-Lago.
A [redacted], Loxahatchee, Florida 33470.
Q How is it that you came to work at Mar-a-Lago?
A My dad is a maintenance manager or supervisor, I don't know what you call it. But he worked in the maintenance department, mostly on tennis courts, working on the air conditioning, helping set up for functions. And he got me a summer job there.
Q Okay. And you said you were on a break?
A Yes.
Q What were you on a break from?
A I think like -- this is going back so long now, but I was attempting to get my GED. And it, summer came, so school stops during the summertime here in America, and I got a summer job.
Q All right. And where were you in school?
A I don't actually know the name of the place. It's -- yeah, I know.
Q A GED place?
A Yeah, it was, like, I was previously in [redacted] Palm Beach High School, but, I mean, because of

a lot of the circumstances that I had been subjected to, I decided I wanted to get my GED.

Q Okay. So you were going to an actual school to get your GED, that's what you're saying?

A Yes.

Q And that school, whatever it was, where you were getting your GED was not Palm Beach High School, right?

A No.

Q And it -- whatever the school was where you were getting your GED took a summer break?

A I believe so, yes.

Q And that was in 2000?

A Now that we know the right dates, yes.

Q And that's when your dad helped you get a quote-unquote summer job?

A Yes.

Q All right. And that summer job was Mar-a-Lago?

A Yes.

Q Okay. Now tell me how you sort of came into Mar-a-Lago for the first time? He asked you to come? They called you? What happened?

A My dad was very liked there. So I think he talked to the people who were in HR. And then

they said for me to come in for an interview.

Q Um-hum.

A To be interviewed for a locker room assistant.

Q Um-hum.

A They liked me. I had to go through a series of drug tests, polygraph tests. I mean, it was a very extensive regime to get a job there.

Q Yeah.

A And when all those came back good, I started the job.

Q So how long do you think it took for you to go through that extensive series of drug tests and polygraph tests and --

A I did them both in the same day.

Q Okay. When was the interview? Was it on the same day or a different day?

A I believe it was like a few days beforehand.

Q Okay. And do you remember who you interviewed with?

A No.

Q Do you remember the title of the job for which you were interviewing?

A Locker room attendant.

Q Locker room attendant was the name?

A Of the position?

Q Yes.

A Yes.

Q And did they give you any training?

A No.

Q Did they show you how to work the lockers?

A Well, I mean, there was a girl who already worked there at the front desk. I think she helped make appointments and greeted people, and then she just told me my duties in the locker room were to, you know, make tea. I had never made tea before, so that was -- that was fun. Learn how to make tea. Clean up after the ladies who had been in the locker room. Make sure the bathrooms were kept nice and tidy. You fold the toilet paper into a little triangle every time anyone went to the toilet. Clean up the sink area. It was a very crazy job.

Q Do you remember the names of any of your coworkers who you worked with at Mar-a-Lago?

A I believe the head of the spa area was Adriana or Adrienne. I can't remember exactly.

Q Okay.

A And the girl who trained me, I have a very clear picture of her face, but I can't remember her

name.

Q All right. What did she look like?

A She had blonde hair, probably to her shoulders, and it was curly.

Q And how old was she?

A I'd say in her 20s.

Q All right. Did they check your identification when you went in for your job interview or your --

A It was very extensive. I'm sure they would have had to check and make sure I was who I was.

Q And so you had a driver's license, right?

A I believe so.

Q All right. And, let's see. Did you move to a different position while you were there or did you always stay as a locker room --

A I wasn't there very long. So I just --

Q Just one second. Did you always stay as a locker room attendant?

A Yes.

Q Okay. I just need to finish my question for the court reporter.

A I know, I'm sorry. I have a tendency of jumping in.

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Q Okay. If I can direct your attention back to Defendant's Exhibit 12 at page 15. And under the heading Response to Interrogatory Number 9, do you see that where it says --

A Yes.

Q -- [redacted]**, excuse me, responds as follows?**

A Yes.

Q Okay. It says you worked as a locker room attendant for the spa area, correct?

A Yes.

Q And it says records produced in this case identify the date of employment as 2000, correct?

A Yes.

Q What records that were produced in this case cause you to believe that the employment began in 2000?

A Uhm, is this going back to another question that I'm not allowed to answer?

Q No.

A I have seen the documents, and I know that my employment now was in 2000.

Q What documents did you see that caused you to make that answer?

A The Mar-a-Lago employment documents.

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Q Are they your Mar-a-Lago employment documents?

A Um --

MR. [redacted]: Object to the form.

A My name is on there.

Q (BY MS. MENNINGER) Okay. Do you believe them to be your Mar-a-Lago employment documents?

A As far as I can tell.

Q Okay. So you were able to review your Mar-a-Lago employment documents --

MR. [redacted]: Object to the form.

Q (BY MS. MENNINGER) -- and respond to the question, as it says right there that you respond, correct?

A Yes.

Q When did you review the documents that you reviewed to cause you to respond to that answer that way?

A I don't think I found out till sometime mid -- mid last year, I believe.

Q Okay.

A I'm really not too sure. You know, I'm sorry, dates and documents, there's too many to remember. But --

Q Okay. You do admit that you filed in many documents that you met Ghislaine Maxwell in '98 or '99, correct?

A Yes.

Q And you do admit that you told members of the media that you met Ghislaine Maxwell in '98 or '99, correct?

MR. [redacted]: Form.

A That was my closest approximation to what I could actually remember, so --

Q (BY MS. MENNINGER) You told the media that you met her in '98 or '99?

MR. [redacted]: Form.

A Again, yes, as close as I can remember.

Q (BY MS. MENNINGER) And the media published in the newspapers that you met Ghislaine Maxwell in '98 or '99, correct?

MR. [redacted]: Form.

A Yes, they did.

Q (BY MS. MENNINGER) And the news media published in the newspapers what you told them, which is that you were 15 when you met Ghislaine Maxwell, correct?

MR. [redacted]: Form.

A Which is what I truly thought at the time, yes.

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Q (BY MS. MENNINGER) Okay. And it is not true that you were 15 when you met Ghislaine Maxwell, correct?

A It was a mistake that I made, yes.

Q So that the printing in the newspaper that you met Ghislaine Maxwell when she was -- when you were 15 is not a true statement of fact, correct?

A It is an incorrect statement as I have now found out, that my employment started in 2000.

Q All right. And to the best of your recollection, you found that out in the middle of 2015, correct?

MS. McCAWLEY: Objection.

A To the best of my recollection. I mean, I can't pinpoint an exact date I found out. But, yes.

Q (BY MS. MENNINGER) About a year ago?

MR. PAGLIUCA: Are we all participating in this deposition or just --

MS. McCAWLEY: Same way you guys did.

MR. PAGLIUCA: We did not.

MS. MENNINGER: I did not.

MS. McCAWLEY: You both objected.

MS. MENNINGER: No.

MR. PAGLIUCA: No, we didn't.

MS. McCAWLEY: We can go back through the

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record.
MR. PAGLIUCA: We sure can.
So if we're all participating, maybe I'll have a few questions at the end of this. I think we should limit this to one lawyer. And your statement about two lawyers participating in the last deposition is wrong.
MS. McCAWLEY: Well, I recall that she got a microphone because she said she was going to be objecting. So --
MR. PAGLIUCA: I know. She put on a microphone and didn't speak through the whole thing.
MS. McCAWLEY: Well, we can take a look back at the record. You know, it's not a problem. Brad can make the objections.
MR. PAGLIUCA: Okay. Let's take care of it that way, then.
MR. [redacted]: Can you tell me when you're at a good stopping point?
MS. MENNINGER: I was about to say it's been an hour.
MR. [redacted]
[redacted]. MENNINGER: So this would be a good time to take a break.
MR. [redacted]: Okay. Thanks.

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THE VIDEOGRAPHER: We're off the record at 10:12.
(Recess taken from 10:12 a.m. to 10:27 a.m.)
THE VIDEOGRAPHER: We're back on the record at 10:27.
Q (BY MS. MENNINGER) All right. [redacted], you testified that you first became aware that you -- your employment at Mar-a-Lago began in 2000, in mid-2015, correct?
MR. [redacted]: Object to the form. Mischaracterizes her testimony.
A I don't know exactly when. It could be towards the end of 2015. It could be towards the beginning of 2016. I just know that I've learned about it recently. I'm not too sure exactly what date I did learn about it.
Q (BY MS. MENNINGER) Okay. But to your mind, it's been within the last 6 to 12 months; is that fair?
A I wouldn't say 12 months, no. I would just say up until -- I don't know when I was shown that, when I actually first saw it, but it wasn't a year ago.
Q Saw your employment records from

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Mar-a-Lago?
A Correct.
Q Okay. I'm going to show you an exhibit marked as Defendant's Exhibit 13.
(Exhibit 13 marked.)
Q (BY MS. MENNINGER) Okay. All right, [redacted], do you recognize this document?
A Yes, I do.
Q What is this document?
A This is a resume that I created myself.
Q All right. And what address did you put at the top of your resume?
A [redacted]
Q And when did you live at that address?
A I believe from 2013 to 2014.
Q Okay. And you said you created this document, correct?
A Yes.
Q And did you send it out to any employers?
A Do you have any attachments that this goes with to say that I have? Because I'm not too sure. I've created a lot of resumes.
Q Okay. And hold on, I'll see if we do.
MS. MENNINGER: All right. I'll mark this

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next as Defendant's Exhibit 14.
(Exhibit 14 marked.)
A Thank you.
Q (BY MS. MENNINGER) All right. Do you recognize this document?
A Yes.
Q What is this document?
A This is me replying to ads for jobs.
Q Okay. And you were communicating with -- by your e-mail, correct?
A Yes.
Q All right. And I apologize. This one actually has the resume attached to an e-mail.
A Um-hum.
Q Do you see that, towards the back of the document?
A Yes, I do.
Q Okay. So --
A Sorry.
Q To whom -- to whom -- with whom were you communicating about a job at this time?
A Well, on the very top, Phil or Gary, and that was for a bartending position.
Q Okay.
A Um --

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Q Was that something your brother had recommended or your father? I don't know who.

A You know, I just looked at that, that's kind of why I giggled. I don't know why my brother -- that's my brother. That's the way we talk to each other: Hi, stupid head. Good luck, smelly, XOXOXO, sissie.

He's my little brother so you have to understand we kind of play around. But subject to my resume for hospitality, I'm not too sure why he would have gotten it, but apparently he did.

Q Okay. And you see that your resume was attached to an e-mail communication you had with your brother?

A Yes, I do.

Q Right. And that's also your brother was part of the e-mail chain with respect to an ad placed on craigslist for a position, correct?

A He was on -- let me just check the dates, then.

Q Sure.

A 1/20/2014, 1/21, so just within a day of each other, yes.

Q All right. And then the resume that's attached is the address you were living at in

January --

A Yes.

Q -- of 2014, correct?

A Correct.

Q All right. So you believe you created the resume that's attached to Defendant's Exhibit 14, correct?

A Correct.

Q And you sent it out with respect to this employment you saw on craigslist, correct?

A Correct.

Q And you are the one who put into this document the contents of the resume, right?

A Yes.

Q All right.

MR. [redacted]: We're talking about the resume that's attached to Exhibit 14, right?

MS. MENNINGER: We are.

MR. [redacted]: Okay. Got it.

MS. MENNINGER: Thank you for clarifying.

MR. [redacted]: Got it.

MS. MENNINGER: Although, I don't know there are any differences with Defendant's Exhibit 13.

Q (BY MS. MENNINGER) But just to be safe,

you believe the one attached to Defendant's Exhibit 14 is the one that you sent?

A There are differences, isn't there? Yes, there is.

Q Okay. What are the differences that you know?

A It starts -- I mean, let me see. The very top introduction is the same.

Q Um-hum.

A After the experience.

Q Um-hum.

A That changes. The dates change. And then underneath Employment Training Recruitment is Indigo Bar & Grill on Exhibit 14. On Exhibit 13 it's Mannway Logistics underneath Employment Training Recruitment.

And then underneath Mannway Logistics on Exhibit 13 is Mar-a-Lago Resort and Spa. And on Exhibit 14 is Gemma Catering/Wedding Receptions. So there is quite a few differences.

Q Okay. Great. Do you have any idea when you sent out Defendant's Exhibit 13, or if you did, to an employer?

A Unless you have something that's attached to it, I can't be sure that I did.

Q Okay. Is the content in Defendant's Exhibit 14, that you believe you sent out to an employer, correct?

A Unfortunately, I have to tell you that they are not correct. Through my experience I was in the mind-set that I was unemployable. I had been abused for many years and I was told by a job agency that I need to show that I've consistently worked at various places and given experience. So it's not something that I'm proud of, but I have had to plump up my resumes to make it look as though I could be employed.

Q What do you mean by plump up your resume?

A Well, I couldn't -- I didn't feel that I could go to an employer and tell them that I had held, you know, one job in the last 10 to 12 years and before that I was trafficked for the purpose of sex. And that's definitely something you don't want to put down on your resume, which makes you quite highly unemployable.

So I did add places in, such as Indigo Bar & Grill, Calmao Flamenco Bar & Restaurant.

Q Wait, wait. Which one?

A On Exhibit 14.

Q Um-hum.

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A Underneath Experience, the dates are all incorrect, as well. It's just to show that I was consistently working, which I was not. And I needed a job to help my family. I've got a family of five. So like I said, it's not something proud that I had to do, but I felt it was the only way that I could actually get employed.

Q You lied on your resume?

A I made it look as though I had continuously worked throughout the years so that way an employer would see me as a potential candidate.

Q Okay. Well, let's start with Employment Training and Recruitment, ET Australia.

Did you work at that place of employment?

A I did work there.

Q What dates did you actually work there?

A I know I finished working for -- we call it ET Australia, so if you don't mind me abbreviating it.

Q However you want.

A I know I finished there in January of 2006 right before my son was born, my first son was born. And I believe I worked there for a year, I believe so. It might have been a little bit over a year, but just around a year.

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Q All right. So you worked at a place for about a year. And on your resume you typed that you worked there for nine years, correct?

A Correct.

Q And you did that, correct?

A I did.

Q Nobody else typed that for you?

A No, I did it myself.

Q All right. And the next employment you list here -- well, is your job description accurate?

A Yes, that is actually accurate.

Q Okay. And everything in there is what you actually did?

A Yes, for ET Australia.

Q Okay. Indigo Bar & Grill, did you type that in?

A I did type that in.

Q And did you actually work at Indigo Bar & Grill?

A No, I did not.

Q All right. So the dates that you put on your resume are not true, correct?

A That's correct.

Q The title of your job at that place was not correct; you didn't work there, right?

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A I never worked there.

Q The description that you typed out about the things that you did at that Indigo Bar & Grill is made up, correct?

A Well, it's -- it's generally what you would do if you were a server or a waitress. But, like I said, I did not work at Indigo Bar & Grill.

Q So when you represented to an employer that you were applying for a job that you had done these things, you had not actually done these things at Indigo Bar & Grill, correct?

A Not at Indigo Bar & Grill, no.

Q All right. Can you read the first sentence of your job description?

A For Indigo Bar & Grill?

Q Right.

A At this restaurant located inside of an RSL, we were never slow.

Q Okay. So when you said, "We were never slow," you just made that up, correct?

MR. [redacted]: Form.

A I tried to give as much information to my potential employer to show that I could handle a large amount of pressure and guests. So, yes, I put that in there.

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Q (BY MS. MENNINGER) But you represented you were there working as a server or waitress and that we were never slow. That is not true, correct?

A Well, I never worked there, so it's -- again, I was very highly unemployable, given my past. So I did whatever I could to make it look as though my potential employer could hire me.

Q Okay. You described your duties that were not -- those were fictional duties, correct?

A They were duties that a waitress and a server would do.

Q But you did not do at Indigo Bar --

A But I did not do them at Indigo Bar & Grill.

Q Okay. You described your energetic service and your service with a smile to the guests. That was not true, correct?

A Everything in Indigo Bar & Grill is not correct.

Q And you created that entire description, correct?

A For the sole purpose of being able to obtain employment, yes.

Q To get money?

MR. [redacted]: Form.

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A To make a wage for my family.
Q (BY MS. MENNINGER) All right. The next job, Gemma Catering and Wedding Receptions, did it -- is that a job that you actually held?
A I did actually work there. I don't know the dates, but I was a server, waitress and bartender.
Q March of 2003 to April 2004, is that about when you worked there?
A It could be very close to it. I'm not too sure.
Q You're not sure?
A No, I'm not sure.
Q Did you have children -- had you already had children at the time you worked there?
A No, I do not believe I did. I became a stay-at-home mom when I had my first child.
Q And what year was that?
A 2006.
Q Okay. So you believe you worked at Gemma Catering and Wedding Receptions before 2006?
A I believe so.
Q And other than that, you can't recall what dates you worked there?
A I'm sorry, I couldn't help, no.

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Q All right. And then what were your actual -- is that your actual job that you had there?
A The description of it?
Q The title, server, waitress, bartender?
A Yes.
Q All right. Is the description accurate?
A To a T.
Q What's that?
A To a T.
Q Okay. The next job you list is Mannway Logistics, Logistics Receptionist.
Is that a job you actually held?
A It is a job I held.
Q And when did you hold it?
A Again, I'm very bad at dates. I'm not too sure.
Q All right. Approximately when did you have it?
A I don't want to speculate and give you the wrong answer, so I'm not too sure.
Q Did you have children at the time you worked there?
A No.
Q So before 2006?
A Yes.

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Q And after you moved to Australia, which was what year?
A I moved to Australia at the end of 2002, I believe.
Q All right. Do you recall going to work shortly after you got to Australia?
A Yes.
Q How --
A I had to obtain my -- my ability to work there. So I think that took a couple months. You can get a temporary visa that allows you to work while you're waiting for your permanent resident status, and that's what we did.
Q All right. Were you able to apply for that temporary job permission before you actually got married in Australia?
A I got married in Aus -- we were married in Thailand, really, but we made it official in January of 2003. And within a couple of weeks, I was granted the permission to work in Australia legally.
Q Okay. So to the best of your recollection, you got permission to work in Australia sometime in the spring of 2003?
MR. [redacted]: Form.
A That's actually summer over there.

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Q (BY MS. MENNINGER) Fair enough. The first quarter of the year, calendar year --
A Yes.
Q -- 2003?
A If we're going to be politically correct, yes.
Q That's what you recall?
A (Indicating.)
I'm sorry, yes.
Q And is your description of Mannway Logistics correct?
A Yes.
Q All right. And how long did you work there?
A I think that was less than a year that I worked there. I would approximate about six, seven months.
Q Can you name one coworker you had or boss or anybody else that worked there?
A I know her name started with an M, but I can't remember. I remember what she looks like. I just don't remember her name.
Q Okay. And how much did you make there?
A I don't remember the exact amount. Approximately about $20 an hour, I think.

Q And how many hours per week were you working for that six months to a year?

A I believe that was full time.

Q And is full time the same in Australia?

A Yeah it's a 40-hour week.

Q Okay.

A Well, 38 because you get two hours of lunch, so, yes.

Q All right. Have you been in touch with anyone from that employment in a while?

A No.

Q All right. The next job listed there is what?

A Calmao Flamenco Bar & Restaurant.

Q Is that someplace you actually worked?

A No, it's not.

Q Is that a place that actually exists?

A I don't really know.

Q All right.

A I mean, I think I looked on the Internet and found something similar to what the description I was needing to fill, and that was it.

Q Okay. So when you were creating this document in 2013/2014, right, that's when you had the Titusville address?

A Yes.

Q All right. You went on the Internet and you searched for a place that would be like the job you were looking for?

A Correct.

Q And you found the name of an actual place, Calmao Flamenco Bar & Restaurant.

Did I get that right?

A I'm not 100 percent on that, but I think so.

Q Okay. And you did that in order to impress the employer you were applying for here in the e-mail, correct?

A Correct.

Q All right. And you did that in order to get money from a job that you hoped to get from this employer in the e-mail, correct?

A I was hoping to gain employment. And not having much experience, I put in there that I had experience.

Q Okay. And you said that you had been advised to plump up your resume by a job agency; is that right?

A Yes.

Q What was the name of that job agency?

A Before I worked at ET Australia, I was actually a job seeker there. And a job seeker, I don't know if you're familiar with the term.

Somebody who is looking for work and you go to a job agency, and you go look on the computer. And you actually have somebody who helps you find employment. And they are the ones who recommend that you show that you've continuously worked throughout your years. They ended up really liking me, so that's how I got the job there.

Q Okay. Was it a particular person there that gave you the advice to plump up your resume?

A It would have been one of the counselors.

Q Which one?

A I don't know.

Q Okay. Do you remember the names of any of the counselors?

A I only remember the name of one of the girls I worked with, but I don't remember -- I don't remember anyone else's name.

Q When did you first become a job seeker at ET Australia?

A Well, if I finished there in 2006 and I worked there for approximately a year, it would have been 2005 -- late 2004, 2005. I'm not too sure.

Q Okay. So you were a job seeker there first and then got employment there, right?

A Yes.

Q Okay. So the advice to plump up your resume was while you were seeking a job or while you were employed there?

A While I was seeking a job.

Q All right. And you were assigned a counselor?

A Yes.

Q One or more than one?

A It changes on a daily basis. There's somebody who comes into the office and they sit with you and they help you with your resume. And then they help you go on the computer and look for open vacancies.

Q So someone in approximately 2005 gave you the advice to plump up your resume. That's what you're saying?

A To make it look like I've continuously worked, yes.

Q Okay. So back to Calmao Flamenco Bar & Restaurant, which is a place you found on the Internet but did not actually work. Is that, the dates for your employment there, December 2001 to

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February 2003, not true, correct?
A Obviously, yes. At that time I was -- during 2001 I was with Jeffrey and Ghislaine being trafficked.
Q Um-hum. So you were not working at Calmao Flamenco Bar --
A Obviously not, yes.
Q And you said you got to Australia in late '02 and did not work there between late '02 and February of ' 03, correct?
A I've never worked at Calmao Flamenco Bar & Grill, period.
Q All right. And the job description that you crafted there is also fictional, correct?
A Yes.
Q All right. And Mar-a-Lago Resort and Spa you put down as a place you had worked, correct?
A Correct.
Q And you typed in August 2000 to September 2001, correct?
A Correct.
Q And you created your job description there, correct?
A Correct.
Q All right. And then turning to the last

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page you have your education, correct?
A Can I just make a statement to say that, again, with the Mar-a-Lago Resort and Spa, I did have to add dates to make it look as though I had continuously worked. So those, again, are incorrect dates.
Q But it is a date that you typed into a resume in 2013 or 2014 --
A That is the date that --
Q If you could just let me finish my question.
A Sure.
Q That is a date that you typed into your resume in 2013 or 2014, correct?
A That is the date that I did type in, but those are incorrect dates.
Q All right.
A And, as well as the -- the position, organizing, making and canceling appointments for massage therapists.
Q All right.
A I mean, I was their locker room attendant. I just wanted it to sound like I had more receptionist experience than I did.
Q You wanted it to look like you had more

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experience than you had had, correct; that's what you just said?
A Correct, I mean given that my past had not enabled me to be able to look for work or I wasn't able to put down what I actually had -- had to do in my past. So I made it look as though I was able to be employed.
Q You did not have the past that you thought the employer was looking for, right?
A I couldn't put down on there that I was sex trafficked for a couple years and did not have the experience to be able to apply for jobs and provide for my family.
So this is something that I said. Again, I am not proud of, but I felt was necessary to do to be able to gain employment.
Q All right. So you were applying for a job at a restaurant, right?
A At this -- according to the front e-mail, yes.
Q All right. And you did not put down Taco Bell on this resume, correct?
A No. The only jobs on here are the ones that we have mentioned.
Q Right. And so why did you choose August

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of 2000 as your start date for Mar-a-Lago?
A It just looks as though I've given them a longstanding history of employment.
Q You chose a month. Why did you choose that month?
A I chose months and dates for every single position on that resume. There is no specific reason why I chose that month. It was just purely to show that I was continuously employed.
Q On the last page it has some education. Which part of that is untrue?
MR. [redacted]: Object to the form.
A I have received my business admin cert 3 from ET Australia. I've never held responsible service of alcohol and gambling.
Q (BY MS. MENNINGER) Do you understand that to be a licensing of some sort or a class? Or what do you understand that --
A In Australia you have to have something called an RSA and RCG to be able to work as a waitress or bartender or anything. And I didn't know if it was the same out here in America. So I put down that I had.
I had taken a CPR and first aid. I don't remember when, but it's not current.

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And I did go to [redacted] Palm Beach High School and I didn't put down a degree there or anything.

Q So is it fair to say you never worked as a waitress in Australia. Is that what you just said?

A I did work as a waitress at Gemma Catering.

Q [redacted], okay.

A I don't believe I needed my RSA to work there. I'm not too sure.

Q All right. And if I could just ask you one other question about Gemma Catering. In the last line of the job description it says: This job was a second job. I would work in the evenings and weekends for saving extra cash.

What was it a second job to?

A If my time period is right, it would be my second job to Mannway Logistics because they were both -- Gemma Catering and Mannway Logistics were both in Sydney, whereas ET Australia was on the central coast.

Q All right. ET Australia is on the central coast?

A Correct.

Q And Gemma and Mannway are in Sydney?

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A In Sydney, yeah.

Q All right. Got it.

Do you know if those two organizations still exist?

A Mannway, I would definitely say, it's a -- it's a large logistic company. I would say it still does exist.

Gemma Catering, I'm not too sure if that exists anymore or not.

Q Okay. All right. So did you spend your 16th birthday with Ghislaine Maxwell and Jeffrey Epstein?

A No. I was 16 when I met them, now that I know the correct dates. So I would have spent my 17th birthday with them.

Q So when you represented that you spent your 16th birthday with Ghislaine Maxwell and Jeffrey Epstein, that was not true, correct?

A At my ability at the time, that's what I believed to be true. It wasn't until I found the Mar-a-Lago records stating the year 2000. Me being born in 1983 would make me turning 17 that year.

Q So please describe for me your 17th birthday that you claim you spent with Ghislaine Maxwell and Jeffrey Epstein.

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A I remember spending a birthday with them on Jeffrey Epstein's island called Little Saint Jeff's. I wouldn't say it was a party. It was just Ghislaine, me, Jeffrey. I believe Emery Taylor was there. I got some presents from them.

Q What presents did you get?

A Ghislaine gave me a whole bunch of makeup, like boxes of different kinds of eye shadows and lipsticks and just makeup altogether.

Jeffrey gave me a bracelet and, I think earrings.

Q What kind of earrings?

A They were what I believed to be diamonds. I don't know what they exactly were. I think Jeffrey was talking about, they could have been passed off as good knock-offs. But they appeared to be diamonds.

Q Any other presents?

A I remember the makeup and the jewelry. I don't remember much else.

Q And that was your 17th birthday, you said?

MR. [redacted]: Form.

A It's hard for me to really pinpoint exactly which birthday it was.

Q (BY MS. MENNINGER) So it could have been your 18th or your 19th?

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A I don't want to lock down on which exact birthday it could have been without knowing.

Q You don't know which birthday it was; is that what you're saying?

A The one that I'm specifically telling you about?

Q Right. You don't know which one?

A No.

Q All right. Do you remember spending more than one birthday with Jeffrey Epstein and Ghislaine Maxwell?

A Yes.

Q Okay. Tell me about the other ones that you remember.

A Well, I know my 19th birthday. I can't remember, really, my 18th birthday. But my 19th birthday we celebrated it early, earlier than my actual date of birth. And that's when he surprised me with tickets to Thailand.

Q What do you mean he surprised you with tickets to Thailand?

A He told me that the tickets for Thailand were for my birthday.

Q Did he hand you something that looked like a ticket to Thailand? What do you mean?

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A He didn't hand me the tickets at that time, but he told me that he had booked me in for massage training at an institute in Chiang Mai.

Q And he told you he had booked you tickets to a massage training in Chiang Mai, Thailand sometime before your actual 19th birthday?

MR. [redacted]: Form.

Q (BY MS. MENNINGER) Did I get that right?

A Yes.

Q Okay. Did he hand you --

A Excuse me.

Q -- hand you anything at that time?

A No, I don't think so.

Q And where were you located when he told you this about the Thailand massage training?

A Jeffrey, Ghislaine and I had just gone scuba -- not scuba diving, not with the big tanks, but snorkeling with just the mask and the two-piece, and on Jeffrey's island, by the way.

And we had gone out for a while. And we had come back. And he's got a pier where it's got a ladder and you climb up. And we were wearing wet suits. So we were taking off our flippers and our wet suits and all of our gear.

And they said they wanted to sit down and

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talk to me, just the three of us. And he -- first, he told me about the --

Q If I could just stop you. I think I asked where were you --

A [redacted], I'm sorry.

Q -- when you had this conversation about the --

A Just the island. I'm just trying to describe the instance that he gave it to me.

Q [redacted], okay.

A It was on the island, on the pier in the Caribbean.

Q Okay. And it was sometime before your 19th birthday?

A Correct.

Q How much time before?

A I don't know. A couple -- six weeks, a couple of months. I don't know. Close to my birthday. It was my birthday present, that's what he told me.

Q Okay. So you don't know when you had this conversation?

MR. [redacted]: Form.

A I mean, I -- no, I didn't record the time and the date, so I can only speculate. It was

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shortly before my birthday, but not my birthday.

Q (BY MS. MENNINGER) Okay. And he told you he had booked you tickets to go to Thailand, right?

A Correct.

Q All right. So you remember one birthday at which you received makeup, bracelet and earrings and one birthday at which you received tickets to Thailand.

Do you remember any other birthdays that you spent with Jeffrey Epstein and/or Ghislaine Maxwell?

A I'm sure there is, but I honestly can't remember what I did for my 18th birthday.

Q Okay. Well, I'm sorry, did you know for sure that the bracelet, earrings and makeup were from your 17th birthday, or do you know?

A I don't know.

Q But you know they were not for your 16th birthday, right?

A Correct.

Q All right. If I could have you go back to Defendant's Exhibit 1, I think.

A Defendant's, sorry, Exhibit 1?

Q Um-hum. Page 9, either at the bottom or in the upper right-hand corner.

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Do you see that page?

A Page 9 of 27, yes.

Q All right. And paragraph 23, do you see that paragraph?

A I see the paragraph.

Q All right.

A I was just going to read it over quickly.

Q By all means.

A I've read it.

Q And the sentence, Defendant and Ms. Maxwell acknowledged and celebrated plaintiff's 16th birthday, is not a true statement, correct?

A Only upon learning about the fact that I just found out my records. I assumed at the time it was my 16th birthday. But now we know different.

Q You admit, as you sit here today, that defendant and Ms. Maxwell did not celebrate your 16th birthday with you, correct?

A Correct, based upon the records.

Q Which you don't know when you saw?

A I know it was, you know, it wasn't -- it wasn't a year ago, but it wasn't that long ago either. So I'm not too sure. I can't tell you the date that I actually saw them.

Q All right. Last year you lived in

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Colorado for part of the year, correct?
A For part of the year, yes.
Q And then you moved to Australia, correct?
A Yes.
Q You did not live in Florida at any point in time during 2015, correct?
A I believe I left Titusville at the end of 2014.
Q Okay. So you did not live in Florida during 2015, correct?
A I believe so.
Q All right. So when you reviewed these records sometime in 2015 that caused you to know the real date of when you worked at Mar-a-Lago, where were you physically located?
MR. [redacted]: Object to the form and mischaracterized her testimony.
A I don't remember where I saw these records, when I saw these records. I know it wasn't a year ago. I know it was more recent. I can't pinpoint the date that I actually saw them, but I recently, I believe -- I don't know. I don't want to sit here and speculate and then give you the wrong answer. It's just new knowledge for me.
Q (BY MS. MENNINGER) All right. Did you

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receive the records by e-mail?
A I believe so.
Q Okay. Did you use any e-mail address other than [redacted]
A No.
Q That's the only e-mail address that you've used?
A That's correct.
Q And the Mar-a-Lago records that you reviewed you received by e-mail at that e-mail address?
A Possibly. I mean, I can't say 100 percent. I could have been told about them. I could have seen them on a piece of paper. I really don't know. This is a very hazy subject. All I know is that I found out and that was able to clarify a lot of dates for us.
Q Okay. What other dates were clarified?
MR. [redacted]: I object and instruct the witness not to answer if any of your knowledge is based on any privileged communication that you had between yourself and any of your lawyers.
Q (BY MS. MENNINGER) Okay. You just said you reviewed records yourself, correct?
MR. [redacted]: Object. That

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mischaracterized her testimony. She actually just testified that she may have heard that.
MS. MENNINGER: No, you're not testifying. I've asked her --
MR. [redacted]: I'm clearing the record up right now, though.
MS. MENNINGER: You can object based on form. That's a valid objection. You've made your record.
Q (BY MS. MENNINGER) Did you review records that clarified dates for you?
A I've either reviewed them or I've been told about -- I can't remember. I'm sorry. I know -- I know now that the dates are what they are, but I don't remember.
Q You don't know when you learned that the dates are what they are?
A No, I don't.
Q And your best guess is what?
MR. [redacted]: Objection.
If any of your answer is based on attorney-client privilege, I'm instructing you not to answer.
A I can't answer, then.
Q (BY MS. MENNINGER) Okay. So have your

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attorneys told you to change your dates?
MR. [redacted]: Objection.
Do not answer that question. This is a question intentionally devised to invade the attorney-client privilege.
She's not going to answer those questions.
Q (BY MS. MENNINGER) You can answer a question about whether your attorneys had told you to lie. Because that would be a crime, and I'm sure --
A I will --
Q -- I'm sure you want to tell me that your attorneys did not tell you to lie, correct?
A I can tell you for a fact my attorneys have never told me to lie.
Q All right. And did your attorneys tell you to change a date?
MR. [redacted]: Objection. She's not answering any questions about communications between her lawyers and herself, period.
Q (BY MS. MENNINGER) So if I could also direct your attention to Defendant's Exhibit 8. It's the manuscript. If you could turn to page 40.
THE VIDEOGRAPHER: I just have a quick request, Counsel.
[redacted], would you mind bringing the

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mic higher up on your jacket, please?
THE DEPONENT: Sure.
THE VIDEOGRAPHER: Thank you.
THE DEPONENT: Tell me if that's okay. Better?
A Okay. Page 40?
Q (BY MS. MENNINGER) Right. Do you see the first full paragraph on that page?
A I do.
Q The first line begins: I spent my sweet 16th birthday on his island in the Caribbean next to Little (sic) St. James Isle. He liked to call it Little St. Jeff's. His ego was enormous as his appetite for fornicating.
Do you see that sentence?
A I do.
Q That is not true, correct? You were not spending your sweet 16th birthday on Little St. James Isle, correct?
A Based on my knowledge at the time that I wrote this manuscript, I thought I did spend my 16th birthday there. And so I put it down in there as that. Now I know that it wasn't my 16th birthday.
Q Or your sweet 16th birthday?
A Well, we --

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MR. [redacted]: Object to the form. Harassing.
Q (BY MS. MENNINGER) Was it your sweet 16th birthday?
A Is it not custom to call your 16th birthday sweet? Have you never heard that saying before?
Q Was it your sweet 16th birthday, [redacted]?
A As we --
MR. [redacted]: She's answered the question. It's been asked and answered.
MS. MENNINGER: She asked me a question, actually. You're not testifying here.
Q (BY MS. MENNINGER) Was it your sweet 16th birthday?
A As I thought, in the manuscript when I wrote it, I thought it was my sweet 16th birthday.
Q Okay. Now that you know it wasn't, where did you spend your sweet 16th birthday?
A Well, I don't know.
Q Well, just give us your best guess.
MR. [redacted]: Objection. And she's not going to guess today. She's going to tell you the answers as she remembers them.

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If you remember the answer, please tell her the answer.
A I don't know the answer, where I spent my sweet 16th birthday.
Q (BY MS. MENNINGER) Do you know who you were with on your sweet 16th birthday?
A No, I don't.
Q Do you know where you lived on your sweet 16th birthday?
A No, I don't.
Q Were you living with your parents on your sweet 16th birthday?
A I don't know.
Q Were you living with Michael on your sweet 16th birthday?
A I don't know. I was a runaway a lot. I don't know where I lived at the time.
Q Okay. Were you working at Taco Bell on your sweet 16th birthday?
A I don't think so. I don't know.
Q Were you working at Publix on your sweet 16th birthday?
A I don't know.
Q Were you working at an aviary on your sweet 16th birthday?

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A Again, I don't know.
Q Do you recall any present you actually got on your sweet 16th birthday?
A No, I don't. I don't know where I spent it, who I spent it with or what I got. I'm sorry.
Q How long did you work at Mar-a-Lago?
A Best of my recollection, it was a summer job. I believe I started in June. And I think I only worked there approximately two weeks, two, three weeks.
Q How many hours a week did you work?
A I want to say it was a -- I want to say it's a full-time job.
Q Do you recall it being a full-time job?
A It was a summer job, but just thinking back, my dad used to bring me in and bring me home. So he worked full time, all day. So -- and I didn't lounge around Mar-a-Lago so, yes, I think it would have been a full-time job.
Q And how much did you make per hour?
A Approximately, I think I remember making $9 an hour.
Q The bracelet and earrings you got for your birthday, some birthday, on Little -- or where was that birthday party, at Little St. James?

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MR. [redacted]: Object to the form.
Q (BY MS. MENNINGER) Where was it?
A At Little Saint Jeff's.
Q Okay. Where are those bracelet and earrings now?
A I left everything behind me when I went to Thailand.
Q Where did you leave them, exactly?
A I had a storage facility and my apartment that I lived in.
Q So where were they, in the storage facility or in the apartment?
A Most likely in the apartment.
Q Okay. What apartment was that?
A [redacted] Palm Beach. I don't know the address, I'm sorry.
Q You don't know the address at all?
A Not at all.
Q Okay. Where was it roughly located in [redacted] Palm Beach?
A I don't know. It's been a long time since I've been back to [redacted] Palm. I don't remember street names or anything.
Q Did it have one or two bedrooms?
A It was two bedrooms.

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Q Was it on the first or second floor?
A The second floor.
Q Who lived there with you?
A Michael first lived there with me. Michael and I broke up shortly after living there. And Tony lived there with me.
Q Okay. And that's the apartment that you left when you went to Thailand?
A Yes.
Q Did you live at more than one apartment with Michael?
A When I was a runaway, he let me stay at his apartment.
Q Was that a different apartment?
A Yes.
Q All right. So you lived at Michael's apartment when you were a runaway?
A Correct.
Q And did you live anywhere else other than those two apartments with Michael?
A We stayed at Michael's parents' house, I think for a few weeks before the apartment.
Q Okay. The apartment that you rented?
A The apartment that Michael rented. I think I was too young to go on a lease.

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Q Well, all right. We'll come back to that in a minute. But the apartment that you left in 2002 was the one in [redacted] Palm Beach that you lived at originally with Michael and then after breaking up with Michael, Tony lived there? That's the one we're talking about?
A Correct.
Q That's the apartment we're talking about?
A That's not the one that --
Q Okay.
A Sorry. I'm confused. Could you please reask the question?
Q All right. I asked you where you left your bracelet or earrings. You think you --
A Okay, yes.
Q -- left them in an apartment, correct?
A Okay. Yes. Yeah, not the one -- not the first one. The one where Tony eventually moved into.
Q That's the apartment you left the bracelet and earrings at?
A I believe so, yes.
Q So when you were working at Mar-a-Lago, you rode with your father every day?
A Yes.
Q What car did he drive at the time?

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A I don't know.
Q Okay. Did you have a vehicle of your own at the time?
A No.
Q Did you have a driver's license at the time?
A Yes. I got my permit when I was 15 and my driver's license when I was 16.
Q Okay. And how were you paid, by cash or check or some other method?
A I don't remember.
Q Did you have a bank account at that time?
A I don't think I've ever had a bank account -- well, up until recently, living here. I don't remember having a bank account.
Q So you believe you got paid by unknown means and you did not deposit it into a bank?
A Correct.
Q What was your uniform when you worked there?
A At Mar-a-Lago?
Q Right.
A It was a [redacted] miniskirt with a little [redacted] polo top with the emblem of Mar-a-Lago on it.
Q Did they give you more than one?

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A I don't know, maybe.
Q Did you wear it to and from work every day?
A Yes.
Q Did you get new ones when you arrived that were clean or did you launder them at home?
A I would have had to wash them when I got home, I suppose.
Q And you think you had more than one or you don't recall?
A I don't recall.
Q All right. Was that something you purchased or did they give it to you?
A They gave it to me.
Q And who else was wearing that uniform?
A The other locker -- the lady that did the front desk next to the locker rooms.
Q She had the same one?
A Yes.
Q Was that Adriana?
A I don't think Adriana wore a uniform. I think she just dressed professional.
Q Okay. And what other employees did you see there at the spa at the time when you worked there?

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A There were -- well, this is in the massage area and there's also like a fitness area. So there's spa and fitness. So there would be the masseuses and then there would be the trainers. And that was just located in that one area away from the main house and stuff.
Q And is that the area in which you worked?
A Yes.
Q In the spa area or the fitness area?
A The spa and the fitness area were in the same complex.
Q Okay. What did the other people who worked in the spa area wear?
A I don't remember what they wore.
Q All right. And what did the people in the fitness area wear?
A I don't remember. I know it was -- we had our own uniforms. Everyone else had their own.
Q Who is we?
A Well, the girls that worked in the meet and greet area. Me and the other girl with the curly hair I told you about --
Q Um-hum.
A -- had our own uniforms. And then the fitness people had their own uniforms. And the

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masseuses had their own uniforms.
Q What did the masseuses' uniform look like?
A I don't remember.
Q No recollection at all?
A None whatsoever.
Q Color?
A No, sorry. I remember mine.
Q Okay. How did it come to pass that you were no longer working at Mar-a-Lago in two to three weeks?
A I was approached by Ghislaine Maxwell.
Q Okay. And how long had you been working at Mar-a-Lago when you were approached by Ghislaine Maxwell?
A Roughly two to three weeks.
Q Okay. Where in the spa were you when you were approached by Ghislaine Maxwell?
A Just outside the locker room, sitting where the other girl that works there usually sits. She was away from the desk. I was reading a book on massage therapy.
Q Was that indoors or outdoors?
A Outdoors.
Q Okay. And what -- were you in the sun or in the shade?

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A In the shade underneath a -- I don't know what you'd like to call it, but, you know, underneath the complex, the building.
Q All right. And what was Ghislaine Maxwell wearing when she approached you?
A I don't remember what she was wearing.
Q Any recollection, color of clothing or anything?
A No.
Q Okay. Any details about her? Was she carrying a purse or anything?
A No. She looked like, from my memory, she looked like she was either there for a massage or fitness. I remember she had a British accent. She was very interested in the book that I was reading.
I mean, we can get into some more details later if you'd like, but I don't remember any more about what she was wearing that day.
Q Did you have a cell phone at that time?
A No.
Q Where were you living at that time?
A At my parents'.
Q And who else was living there with you at the time?
A My mother and my dad and my brother.

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Q Which brother?
A Sky.
Q What about your other brother?
A I think he had moved out by then.
Q What forms of communication did you have? Just a home phone number, or what?
A Yeah, there was a home phone.
Q When do you recall ever getting a cell phone?
A The first cell phone I ever got was the one that Ghislaine gave to me.
Q So you never had -- your parents, did they have ones when you were working at Mar-a-Lago?
A No, my dad used to -- like, we had phones in the spa and maintenance area and so on, so forth. And you could, so to speak, page people from around the courts.
Q Okay. So tell me what you recall of the first conversation that you had with Ghislaine Maxwell.
A I'm sitting there reading my book about massage therapy, as I'm working in the spa. And I'm getting my GE -- well, I was in the process of getting my GED before I went to my summer job. I decided that I would like to become a massage

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therapist one day. And the body really intrigued me, you know, reading this massage was a lot about anatomy, blood flow. Everything to do with, you know, touching somebody somewhere and then triggering a result somewhere else. I just was very intrigued by the whole anatomy thing.
She came up, Ghislaine, sorry. Ghislaine came up and approached me at the desk that I was sitting at. And my book was like this (indicating) and she said, [redacted], you're reading a book about massage. You want to do massage? And I told her, Yes, you know, I'm very interested in it. One day I would like to become a masseuse.
Q All right. Where did you get the book on massage?
A Maybe the library.
Q Maybe or do you recall?
A I don't think I purchased it. So I'd have to say the library.
Q Okay. What library was that?
A Whichever library was close to my house.
Q Do you remember a library being close to your house?
A There's one in Wellington that I used to go to. [redacted], no, there's one in [redacted] Palm. Yeah,

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there's one in [redacted] Palm and Wellington, and I used to go to both.
Q Did you have a card for both?
A Did I have a card?
Q A library card?
A Yeah.
Q For both places?
A To be able to rent out a book, yeah.
Q Okay. So the best of your recollection is you used one of your library cards at one of those two libraries to check out a book on massage and anatomy?
A Correct.
Q And when did you do that relative to starting at Mar-a-Lago?
A Probably within the first week. I mean, I saw what the massage therapists got to do. I mean, their jobs were so relaxing. The music, like the atmosphere, they always had happy clients. It just seems like an ideal job.
Q And so you were spurred to go to the library and check out a book?
A Well, I had been talking with the other massage therapists and they're the ones who first intrigued me about what they do. And, you know, I

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wanted to aim for something higher than being a locker room attendant one day. And. Yeah.
Q What was the name of the massage therapist that you were speaking with?
A [redacted], I have no idea.
Q Can you give me any physical description of any of them?
A Um, there was one who had blonde short hair. There was -- I would say there's probably about four massage therapists that work in there. So, I mean, I don't remember all of them.
Q Okay. What time of day was it?
MR. [redacted]: Object to the form.
A Afternoon.
Q (BY MS. MENNINGER) How late?
A Anywhere between 2 to 4.
Q And what time did you get off of work?
A I believe I got off at 5.
Q And what was the rest of your conversation with Ms. Maxwell?
I'm sorry, I don't think you finished.
A Thank you. Well, she noticed I was reading the massage book. And I started to have chitchat with her just about, you know, the body and the anatomy and how I was interested in it. And she

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told me that she knew somebody who was looking for a traveling masseuse.

And I said, Well, I don't have any accreditations. This is the first book I've ever read. She goes, That's okay. I know somebody. We can train you. We can get you educated. You know, we can help you along the way if you pass the interview.

If the guy likes you, then, you know, it will work out for you. You'll travel. You'll make good money. You'll be educated, and you'll finally get accredited one day.

Q Okay.

A She finished off by, you know, giving me her number. And I told her I'd have to ask my dad. And I called my dad. I ran over, actually, to see my dad, talked to him. He said it would be okay. I used the phone from Mar-a-Lago to call her and tell her that I was allowed to come over.

And she said, Great. Meet me here at -- I don't remember the exact address, but it was El Brillo Way in Palm Beach -- after you get off. And my dad drove me.

Q Did you write down her add -- the address that she gave?

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A Yes.

Q Did you write down her phone number?

A Yes.

Q So did you go run and talk to your dad while she was still there?

A No, I believe she left. And she told me to ask my dad and then to give her a phone call.

Q Okay. Did she ask you your age when she had that conversation with you?

A No, she did not.

Q Did you tell her your age?

A No, I did not.

Q And so somewhere you wrote down a phone number to call her back at?

A Um-hum.

Q All right. And where did you write that down?

A Probably just a piece of paper lying around the desk.

Q Okay. But you don't remember?

A I mean, no, I don't have that piece of paper anymore, so no.

Q Okay. And did you write down an address?

A Yes.

Q And what number do you think you called?

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A cell phone or a home phone, or do you have any idea?

A I have no idea. Ghislaine answered. So if it was a home phone, the butlers probably would have answered. So most likely it was her cell phone.

Q All right. And what happened when you got off of work?

A My dad drove me to El Brillo Way.

Q Um-hum.

A We arrived at a very large pink mansion. And we knocked on the door. My dad got out of the car and we knocked on the door.

Q Do you recall which car this was?

A I don't know what he was driving at the time. My dad always drives trucks. So it would have been some kind of truck.

Q But you don't know which kind?

A I don't know if it was a [redacted] or a Dodge or --

Q What kind of car does your mom drive?

A Right now?

Q No, in 2000.

A [redacted], I have no idea. I don't remember. They change cars quite often. They like getting different cars.

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Q When did you get your first car?

A After my trip to London to meet Prince Andrew.

Q Okay. What kind of car did you get?

A A Dodge Dakota.

Q And did you purchase that yourself?

A Yes, I did.

Q And how much did it cost?

A I don't remember off the top of my head how much it cost.

Q Who did you buy it from?

A My dad helped me bargain with it. I don't remember where we bought it from.

Q And was the title put in your name or your dad's name?

A I think the title was put in my name. I think. I mean, my dad was with me. I've never registered a car or anything like that before. So --

Q So that was your first time?

A Yes.

Q Memorable, right?

A Yes.

Q When you got there, a [redacted] or someone answered the door, is that what you said?

A No, Ghislaine answered the door.

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Q Okay. And then what happened?
A She shook hands with my dad. Like, she briefly opened the door. She stepped out, shook hands with my dad. Told her (sic) she'd look after me and she'd make sure I get a ride home. And just very briefly, that was it. And my dad left, and I went inside with Ghislaine.
Q Did Ghislaine and your dad have any discussion about what it was you were doing there, in your presence?
A You know, I can't recall exactly what was said. But I had already told my dad what was -- what the interview was for. So --
Q What did you tell your dad?
A That a very nice lady approached me and told me that she would offer me an education to become a massage therapist. And it was a great -- it would be great experience for me to be able to get educated and trained and eventually be accredited. So he was very happy for me as well.
Q You told him that outside of the presence of Ghislaine?
A Yes, when I first ran to the tennis courts where he was at.
Q And then, in your presence at the home,

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did your dad and Ms. Maxwell have any conversation -- further conversation about what you were doing there?
A I don't recall. I think they probably would have chatted for approximately -- maybe 30 seconds. It really wasn't a long chat.
The things that stick out in my mind were, We will take good care of her and we'll be bringing -- we will make sure she gets a ride home.
Q And how far away did you live?
A Approximately 30 minutes.
Q And that's with your parents' house, right?
A That was my parents' house.
Q Did you see any other employees or any other people inside the house on that day?
A Yes.
Q Who else did you see?
A Juan Alessi.
Q Um-hum.
A And Maria. But Jeffrey and Ghislaine like to call them John and Mary.
Q Okay. Where did you see John?
A Downstairs after the whole ordeal.
Q Um-hum. Which room?
A The kitchen.

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Q All right. Where did you see Mary?
A The same place, kitchen.
Q Were they talking to one another?
A No. Mary was doing something with the dishes. They were always either cleaning up or doing stuff, so --
Q And you saw them in the kitchen?
A In the kitchen area. I mean, you have to understand there's like three parts to that kitchen. So it's very large.
Q All right. What part did you see John in?
A In the corner, left hand. And Mary was in the same vicinity but not right next to him. They weren't chatting.
Q What is also contained in the corner, left hand of the room?
A There's like a -- like shelves with -- I don't know. Just shelves that I remember, you know, open door pantry stuff.
Q What was Ms. Maxwell wearing when you arrived at the home?
A I don't remember what she was wearing.
Q The book that you were reading at the spa that day, do you recall the name of it?
A No. I just know it was -- it said the

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word massage on the front of it. I don't know the title or the author.
Q Do you know the color of the book?
A It was -- it was dark. It was a, like plastic covering.
Q All right. And how big was it, if you can just demonstrate for the video?
A Smaller than that. Maybe -- I don't -- maybe a little bit less than that.
Q Can you hold it sideways for the video?
A (Complied.)
Q So you're saying the book size was a little bit less than half of --
A Right. I mean, the book was a little bit bigger. The pages were -- you know, this is very small print. This is printed A4 longways, whereas, I think. It wasn't A4 that way. I don't know. It was just a book. And I don't know how many pages it had either. I mean, approximately, maybe 100 pages.
Q Okay. So maybe my question wasn't a very good question.
How big was the outside of the book, not the thickness, but the length and the width?
A Maybe like here (indicating).
Q So a little bit bigger?

A Longer than this, yeah. We're going to fold it in half again, and then like that (indicating).

Q So larger than an 8 and a half and 11 piece of paper?

MR. [redacted]: Form.

A I don't know what 8 and a half and 11 inches is. If this is 8 and a half and 11 inches, then yes. It's (indicating).

Q (BY MS. MENNINGER) So when you fold it in half, is that a little bit smaller, folded in half, than the book --

A Yeah, if I were going to hold the book like this, if I were going to sit there and read the book like this, in my mind it would be a little bit bigger than what I'm holding right here.

Q All right. So you're demonstrating the book as it's opened that way?

A Yeah, let's just say I'm reading it like this.

Q Okay. Got it.

MS. MENNINGER: I'm going to suggest we take a short break. We can --

MR. [redacted]

[redacted]. MENNINGER: -- order lunch for you

guys and then do a little bit more before the lunch gets here --

MR. [redacted]

[redacted]. MENNINGER: -- if that works for everybody.

MR. [redacted]: Yeah, that's great.

MS. MENNINGER: All right. Let's do that.

THE VIDEOGRAPHER: We're off the record at 11:38.

(Recess taken from 11:38 a.m. to 11:57 a.m.)

THE VIDEOGRAPHER: We're back on the record at 11:57.

Q (BY MS. MENNINGER) How long were you at the El Brillo home on that first day you went?

A Over two hours.

Q Okay. And who took you home?

A Juan Alessi.

Q And what car was he driving?

A I believe it was a black Suburban.

Q Did anyone else ride in the car with you?

A Just Juan.

Q What time approximately did you get home?

A 8:30, approximately.

Q Was it dark?

A Yes.

Q Who else was at home when you got home?

A My mom, my dad and my brother.

Q Which brother?

A Sky.

Q And anyone else who was there at the time?

A I believe Michael might have been living with me at that time. So he might have been there.

Q Do you recall if he was there when you got home?

A I don't really remember. I remember what I did when I got home, that I basically made a beeline for the bathroom.

Q Let me ask you a question. Michael was living with you at that home, at your parents' home at the time, is your best recollection today; is that right?

A That's my best recollection, yes.

Q When you say living with you, were you guys staying in the same room?

A Yes.

Q Were you engaged at that time to him?

A That was a really weird relationship. He was a friend who looked after me, and he did propose to me and I did say yes. But my heart was never in

it.

He was somebody that helped me off the streets so I felt compelled to say yes to him.

Q Okay. So when he proposed to you and you said yes, did that take place before you started working at Mar-a-Lago or after you started working at Mar-a-Lago?

A Before.

Q And so if he were living with your parents at that time, you were living in the same room; is that correct?

A I believe so.

Q And your parents understood him to be your fiance?

A I don't think they agreed with it, but I think they understood it as that. I mean --

Q I mean, you communicated to them that he had proposed and you had accepted?

A Yeah, in not such a pretty way. I mean, they obviously weren't very happy about it. And it wasn't my true intentions to ever marry him.

Q Okay.

A But I did it to make him feel okay. I didn't want to be mean.

Q What did your mom say about your

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engagement to Michael?
A [redacted], they never thought it was going to go forward either.
Q When you got home, you said you made a beeline for the bathroom?
A Correct.
Q And what did you do in the bathroom?
A I showered.
Q Okay. Did you have a conversation with anyone prior to going to the bathroom?
A My mom came into the bathroom and -- and she, you know, she asked me how it went. And I told her I'd rather not talk about it. And she didn't push me any further for any more conversation.
Q Okay. And then she left the bathroom?
A She left the bathroom.
Q Did anyone overhear that conversation?
A No, the door was closed.
Q Was your dad at home?
A Yes.
Q Did you have a conversation with your dad that night?
A Not that I remember, no.
Q And did you have any other conversation with your mother that night?

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A No.
Q Did you have any conversation with your brother that night?
A No. He's -- he's five years younger than me. It's not something I'd talk to him about.
Q And did you have any conversation with Michael that night?
A I could have. I don't remember having one, but I could have.
Q Did you call any of your friends that night?
A No.
Q Who were your good friends at that time?
A Rebecca Boylan (phonetic). That was really it. I didn't really have many friends. I kept to myself a lot.
Q Did you call Tony [redacted] that night?
A I don't think Tony and I were -- we were on and off friends from middle school. And no reason on and off like we had an argument or something. We just got out of touch.
Q Um-hum.
A So, no, at that time I don't think I was talking to him.
Q Are you aware of any distinguishing

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physical features of Ghislaine Maxwell?
A I can tell you that she had very large natural breasts. I can tell you that her pubic hair was dark [redacted], nearly black. I don't remember any specific birthmarks or moles that I could point out that would be relevant.
Q Any scar?
A I don't remember any scars.
Q Any tattoos?
A No tattoos.
Q When did you next go to the El Brillo house?
A I believe it would have been the next day.
Q You believe it would have been or was it?
MR. [redacted]: Form.
A I know that it was consecutive, that I continued to go there after my first -- the first time that the abuse took place there. It was consecutive that I was there, I believe, over the next course of weeks.
Q (BY MS. MENNINGER) What day of the week was the first time you went?
A I don't know.
Q Do you know whether you went the very next day or not?

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A I believe I did.
Q All right. How did you get there the very next day?
MR. [redacted]: Form.
A I believe my dad dropped me off again.
Q (BY MS. MENNINGER) When you say you believe, do you recall him doing that or are you guessing?
A I don't -- well, this is how I figure this. I don't remember Ghislaine picking me up from Mar-a-Lago. I didn't have my own car. So the only way I could have really gotten there would have been my dad picking me up -- I mean, sorry, dropping me off.
Q Do you have a distinct recollection of your father dropping you off there more than one day in a row?
A Yes.
Q You do not recall the car he was driving?
A Like I said, he always drove trucks. That's as good as I can get.
Q And so -- and you worked on weekends as well at Mar-a-Lago or no?
A No.
Q So the second day would have had to be

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another weekday or was it on a weekend?
MR. [redacted]: Form.
A I don't know.
Q (BY MS. MENNINGER) Do you know if you went after work at Mar-a-Lago?
A Yes.
Q So you went to work the very next day at Mar-a-Lago?
A Yes.
Q Did you have a conversation with anyone at Mar-a-Lago about the day before at El Brillo?
A No.
Q You didn't talk to any of your coworkers about it?
A No.
Q Who was your boss at the time?
A No.
Q Did you have a boss at the time?
A I think Adriana or Adrienne. I don't remember the exact pronunciation of her name, but it's along those lines. I believe she was my boss.
Q And you did not talk to her about it?
A No.
Q You surmise that your father dropped you off because you can't think of another way you would

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have gotten there, correct?
A Correct.
Q And when you came the second day, did your father come to the door?
A I don't think he came to the door that time. I think I was just dropped off.
Q All right. And what did you do when you got there?
A Knocked on the door and --
Q Who answered the door?
A Juan Alessi.
Q Okay. Was anyone else there besides Juan Alessi?
A Jeffrey, Ghislaine and Emmy Taylor.
Q Okay. And where did you see Emmy Taylor?
A She was downstairs.
Q Did you speak to her?
A Just introductions.
Q Tell me what you mean by introductions.
A My name is Virginia. Nice to meet you. Her name, she introduced herself as Emmy. And she told me she was Ghislaine's personal assistant.
Q Did you call yourself Virginia at the time?
A No, I think I've gone by Jenna for a long

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time.
Q So did you introduce yourself as Virginia or as Jenna?
A Most likely Jenna.
Q Do you recall this or is this something that you're guessing about?
A Well, considering that everybody knew me as Jenna, I think I would have introduced myself as Jenna.
Q You don't recall it?
MR. [redacted]: Form.
A I don't recall the exact answer to that, no, but just knowing I had everybody pretty much call me Jenna.
Q (BY MS. MENNINGER) I'm just trying to make a clear record about what you do remember and what you're guessing about. So when you say I think I would have, it leads me to believe you don't recall it.
If you mean something different by that --
A I --
Q -- please feel free to clarify. I'm just trying to explain to you what I'm asking.
A Yes. And I'm doing the very best that I can tell you exactly what it is. But it's just hard

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for me to remember so long ago. And knowing that I introduced myself as Jenna to everybody leads me to assume that I would have introduced myself to them as Jenna as well.
Q All right. But if we were to speak to Emmy Taylor, she might have a different recollection, fair to say?
MR. [redacted]: Form.
A She could.
Q (BY MS. MENNINGER) How is it that you knew to come there on this second day?
A I was asked to come back.
Q When were you asked to come back?
A The day before, after the encounter they told me to come back at the same time after work.
Q Who is they?
A Jeffrey and Ghislaine.
Q Okay. Did they both simultaneously say that or did one of them say it?
A It was like a conversation that they both had with me separately. Jeffrey told me upstairs after the whole entire abuse had happened that he really liked me and he'd like me to come back.
When I went downstairs --
Q Let me just stop you there. Did he say, I

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want you to come back tomorrow?
A Yes.
Q Okay. Did he tell you what time tomorrow he wanted you to come back?
A No, he just said he wants me to come back tomorrow.
Q Okay. And then you went downstairs and what happened?
A Ghislaine told me I did a really good job and she wants me to come back tomorrow after work.
Q That's what she said, I want you to come back tomorrow after work?
A Yes.
Q You recall those words being used by her?
A Yes.
Q Did you ask them for a ride to get there the next day?
A No.
Q You just said, I'll come back tomorrow.
A Yeah. I agreed to come back the next day.
Q How did you agree?
A Verbally.
Q Okay. Was anyone else present when Ghislaine said that to you and you responded, I'll come back tomorrow?

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A I believe Juan Alessi was pretty much within ear distance.
Q Could you see him?
A Yes.
Q Okay.
A Like I said, in ear distance, when I mean ear distance like hearing, in the hearing vicinity. And it was in the same time that she was asking him to drop me off at home.
Q Okay. When you were driving home the first night with Juan Alessi, did you have any conversation with him?
A No. I had told him my address. It was a very quiet ride.
Q Did you ride in the front or the back?
A The front.
Q It is your contention that, Ghislaine Maxwell had sex with underage girls virtually every day when I was around her, correct?
A Yes.
Q All right. With whom did Ghislaine Maxwell have sex in your presence?
A Well, there's a lot of girls that were involved. We weren't on a first name basis with each other. I wouldn't be able to give you lists of names

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of girls. It was continuous.
Q It was continuous. Name one girl that Ghislaine Maxwell had sex with in your presence.
A Emmy Taylor. I mean, that's a name that I know well because Emmy was always around.
I'm trying to think of her name, sorry. Sarah. Her name used to be [redacted]. I think she's changed it now that she's married.
[redacted] (phonetic) -- I can't pronounce her last name properly, but it's around those lines.
There were a lot of other girls that I honestly can't remember their names. I'm sorry. I wish I could help out more because I really would like to provide more witnesses for this, but I can't remember a lot of girls' names.
Q So those are the three names of females that you observed Ghislaine Maxwell have sex with --
MR. [redacted]: Object to the form. Mischaracterizes testimony.
Q (BY MS. MENNINGER) -- is that what I understand your answer to be?
MR. [redacted]: Objection. Mischaracterizes her testimony.
A Those are -- those are some three of the

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names that I know very well. Like I said, there was a lot more.
Q (BY MS. MENNINGER) Okay. Do you know the names of any other girl that you personally observed Ghislaine Maxwell have sex with?
A Do you mind me taking a minute to just try to reflect?
Q No.
A Um, her name is on the tip of my tongue. Her last name is [redacted]. I don't remember her first name off the top of my head. I normally could remember it.
Q Okay.
A There's just a blur of so many girls. It's really hard for me to remember. And you have to understand we weren't introduced to each other on a first name basis half the time. A lot of these girls would come and go and you'd never see them again.
So, no, it's very difficult for me to pinpoint exactly who they were. But those four that I've given you are 100 percent.
Q Okay. Did you observe Ghislaine Maxwell forcing any of those four girls to have sexual contact with her?
MR. [redacted]: Form.

A I don't believe that any of the girls involved were truly willing participants doing it out of their own wanting. I believe we were all there for one purpose, and that was to keep Jeffrey and Ghislaine happy and to do our jobs, which was giving them erotic massages and keeping them pleased sexually.

Q (BY MS. MENNINGER) Okay. Do you know what the word force means, physical force?

A If you mean like held down or a gun put to the head, then no.

Q Okay.

A But force in a word -- like a way of coercion. There was definitely indirect threats that you knew these people were powerful. They had a lot of contacts. They were very wealthy. They were people you did not want to cross lines with on a bad way.

Q Okay. What threats did you hear Ghislaine Maxwell state to you?

A Just the reminders of the prominent people that she knows personally.

Q When did Ghislaine Maxwell remind you about the prominent people that she knows personally?

A It was on a constant basis. I mean, there

was no just one time that she said it. It was like a reminder, you know. And Jeffrey did a lot more of that than she did. But she definitely made it aware that we shouldn't cross boundaries with them.

Q Or what would happen?

A Like I said, it was more of an indirect threat. And it doesn't take an intellect to figure out what they mean when they say that they're powerful people and they're very wealthy and they know a lot of people.

Q I need you to be very clear. You just used the word "they." I've asked you about Ghislaine Maxwell.

A Okay.

Q So I just want to make sure you understand the question.

A Correct.

Q Because I don't want to have you, you know, misunderstand the question.

A Correct.

Q So I'm asking you, what did Ghislaine Maxwell say would happen in regards to crossing a line with respect to her knowledge of famous people?

A In a --

MR. [redacted]: Object to the form.

Mischaracterizes her testimony.

You can answer.

A You wouldn't want to piss us off. You wouldn't want to piss me and Jeffrey off. I mean that's one way of saying it. Other than --

Q (BY MS. MENNINGER) Did she say, I don't want -- you would not want to piss me off?

A Piss me off is probably my word, using piss, but it was along those lines. I don't remember the exact word that she used.

Q And do you remember a specific occasion on which she said that to you?

A I remember very early on.

Q Where were you?

A I believe it was during my, what I call the training period with Jeffrey and Ghislaine.

Q Okay. And where were you?

A For a specific -- and like I said, it happened a lot. But for one specific, I remember being out on the balcony in the house at El Brillo, sitting outside with her. This is when I thought that -- I didn't know that I worked for Jeffrey immediately. I thought I worked for Ghislaine because she was the one who brought me in. And she was the one offering the majority of the training to

me.

So, yeah, it was on the balcony, outside, I believe the yellow room.

Q She said, You would not want to piss me off because I know powerful people, or words to that effect?

A Words to that effect, yes.

Q And did she say what would happen if you pissed her off because she knows powerful people?

A That statement alone was enough to let me know. I was scared and I didn't want to -- I didn't want to push any further into that question. I seemed like I would obey.

Q Up until that point in your life, had you met any powerful people?

MR. [redacted]: Form.

A I do believe that I've been put in very dangerous situations, being a runaway and having a lot of bad things happen to me. Understanding the word powerful people and things that could happen, I've put two and two together and knew what she meant.

Q (BY MS. MENNINGER) Okay. So you had met powerful people before the day that Ghislaine Maxwell said this to you; is that your testimony?

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A Nowhere near as powerful as Jeffrey and Ghislaine, nowhere near. But people that did scare me, yes.

Q Okay. And you had met those people at what age?

A I don't know what age I was. I'm sorry. I was young. I was -- before I met Jeffrey and Ghislaine.

Q Is there any girl who you personally observed to have sexual contact with Ghislaine Maxwell when she was under the age of 18?

A It's very hard to tell how many girls were under the age of 18. My instruction from them was the younger the better.

Q And, again, them, who told you that?

A Them, both of them. They both -- Ghislaine did the majority of my training in the beginning. Jeffrey also insinuated and told me lots of things as well.

Q Okay. So you don't know the age of any other female that you saw have sexual contact with Ghislaine Maxwell --

MR. [redacted]: Object --

Q (BY MS. MENNINGER) -- is that true?

MR. [redacted]: Object to the form of the

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question. Mischaracterized her testimony. She wasn't finished with her answer.

MS. MENNINGER: I wasn't finished with my question when you objected. And at the end of my question I said, "Is that true?" She can now restate it without you suggesting to her the answer.

MR. [redacted]: I have no idea what the question is to even object to at this point.

Do you know the question?

A Do I know any underage girls that Ghislaine slept with.

MS. MENNINGER: Can you please read back the question?

(Record read as requested.)

MR. [redacted]: Hold on. She wasn't finished with her question, she told me. So that's not the finished question.

MS. MENNINGER: You interrupted it. I finished my question. She just read it to her.

Q (BY MS. MENNINGER) Can you please answer the question?

MR. [redacted]: Then I object to that question as a mischaracterization of her testimony. And she wasn't finished with her answer.

A It is impossible for me to know the ages

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of all the girls that were sent to Jeffrey and Ghislaine. That is my answer.

Q (BY MS. MENNINGER) I did not ask you about the girls who were sent to Jeffrey and Ghislaine. I asked you about any girl that you personally saw have sexual contact with Ghislaine Maxwell.

Do you understand that question?

A Do I know the ages of them?

Q Do you know the age of any girl that you saw have sexual contact with Ghislaine Maxwell?

A Well, for instance, I mean, [redacted] was, I think, a year older than me. That's one way of putting it. Emmy, I think was like a few years older than me. [redacted] again, a few years older than me. I mean, those are the girls that I can actually name.

Without, not knowing the other girls' names, there's no way for me to identify what age they actually were.

Q Okay. Describe for me any other girl other than the ones that you've named who you say you saw have sexual contact with Ghislaine Maxwell with your own two eyes.

A There's so many I don't know where you

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want me to start. I find it impossible to answer that question with the amount of girls that I have witnessed. And without being able to give you specific names, I don't think I'm able to answer that question.

Q Okay. I asked you to describe them, so you could give me a height, a hair color, anything else that comes to mind?

A There were blondes, there were brunettes, there were redheads. They were all beautiful girls. I would say the ages ranged between 15 and 21.

Q And why do you believe the ages ranged from 15 to 21?

A Some of them looked really young. Some of them, I wouldn't say 21 looks old or anything like that, but it's hard to gauge another person's age without really asking them. But some of them looked younger than me and some of them looked older than me.

Q And in what physical locations did you see Ghislaine Maxwell have sexual contact with any girl?

A 100 percent, the U.S. V.I.

Q Where?

A Jeffrey's island.

Q Where?

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A In cabanas. Do you know what I mean by cabana?
Q I do, thank you.
A In cabanas, in Jeffrey's room.
Q Describe Jeffrey's room on U.S. V.I. for me.
A So can I use this as an idea? Like if this is the island -- can I do that?
Q I'm asking you to describe the inside of a room.
A [redacted], the inside of a room. I thought you meant located.
Q Um-hum.
A Okay. Large, stony. He had a [redacted] size bed with posts on it. There was a large door, I think it's called a door, where you put your clothes. There was an adjacent bathroom with a more stony look, giant tub.
Q What color was the paint on the wall?
A It was [redacted].
Q What color was the bedspread?
A [redacted].
Q What color were the sheets?
A [redacted].
Q And you saw Ghislaine Maxwell have sexual

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contact with an unknown, unnamed female in that room, correct?
A Absolutely.
Q All right. When were you there that you saw this happen?
A This happened on so many occasions. The island was a place where orgies were a constant thing that took place. And again, it's impossible to know how many. And, like I said, it wasn't just Jeffrey's room. It was outside and, you know. It was --
Q When you were outside did you see Ghislaine Maxwell have sexual contact with a female?
A When you say sexual contact does that mean fornicating or down to taking explicit photos or what -- can you define what you mean by sexual contact?
Q Sure. It generally, in my mind, means placing either mouth or intimate parts or hands on the breasts, buttocks, or pubic area of another person for sexual gratification.
A Sure.
Q Did you see Ghislaine Maxwell have sexual contact with a woman outside on the U.S. Virgin Islands?
A I would say a female. I wouldn't define

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them as a woman. A woman is someone who is older. But, yes, outside by the pool, down by the beach there's these -- they're little -- I wouldn't call it a hut. Little tiny wooden room that only could fit a bed in it.
Q I'm talking about outside.
A That's outside.
Q So let's start with by the pool.
A Yes.
Q Is that a different occasion than the hut?
A I'm talking about many occasions.
Q Okay.
A Over time.
Q Let's just talk about the ones that you saw happen outside, out of doors.
A Okay.
Q Okay?
A Yeah.
Q Do you recall any such specific occasion or is it just a big blur in your mind?
A No, I mean, one occasion stands out. Models were -- I think they were models -- were flown in. There were orgies held outside by the pool. That's one occasion.
Q All right. Let's stick with that

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occasion.
A Okay.
Q What sexual contact did you observe Ghislaine Maxwell have with a female by the pool at an orgy on the U.S. Virgin Islands?
A Well, there was quite a few girls and it was -- excuse me, if I'm saying this in an inexplicit way, but I don't know how else to say it. So if you don't understand, please let me know -- girl-on-girl action. So there was a lot of -- what's the word for it? Licking, licking vaginas, breasts.
Q Okay. Which --
A Fingers being used. She was involved with that. I remember specifically I had to go down -- do you know what I mean by go down?
Q It's your testimony. Go ahead.
A I had to go down on Ghislaine. Jeffrey was there as well.
Q And this is -- we're still by the pool?
A We're still by the pool with lots of girls.
Q Can you name any of those girls that were there?
A They didn't even speak English. But this was --

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Q Can you describe them physically?
A Beautiful, tall, some were blonde, some were sandy [redacted]. They had a foreign tongue.
Q What -- what language were they speaking?
A I'm not too sure. It could have been Russian. It could have been Czechoslovakian. It could have been -- I think it's between those two, to be honest. It could have been something else but, I mean, I don't speak any other language other than English, so I don't really know.
Q All right. Any other time you saw Ghislaine Maxwell have sexual contact with another female outdoors in the U.S. Virgin Islands other than this, models with the unknown language?
A Are we talking about besides with me as well?
Q I don't know if you participated. I'm asking if you observed her have sexual contact with another female?
A Another female other than myself?
Q You can answer it however you want.
A Well, and the list keeps going on. Ghislaine and I and Jeffrey and Emmy Taylor participated in, I guess what you would call a foursome in the living room in the main house.

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Q Okay. I was asking about outdoors. Sorry.
A [redacted]. Well, I don't know if you'd consider this outdoors, but on the beach where those -- it's basically an outdoor setting. It's like a little wooden house. It's not a house, only a bed can fit in there. It's right on the beach. It's open.
Q Um-hum.
A Would you consider that outdoors?
Q I have never been there. So I don't know whether it's outdoors or not.
A I would consider it outdoors. And --
Q How old were you at that time?
A I don't know.
Q Okay.
A I have no idea. Again, Ghislaine, myself, Jeffrey, another girl in this blue, outdoor -- I don't know what you want to call it. Cabana, that a house -- just a bed could fit in.
Q How many times did you visit the island?
A I wouldn't be able to say. Lots of times.
Q More than five?
A Definitely more than five.
Q More than ten?
A More than ten.

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Q More than 20?
A I would say more than 20.
Q More than 50?
A I don't think more than 50, but --
Q Did --
A I don't have an exact number. I mean, if -- I think if you look at the flight logs, you know, that helps, but then they're not fully complete. We only have flight logs to one plane and then there's a time I was flown commercially into the island.
Q Um-hum.
A So it's really hard for me to gauge a number.
Q Okay. Do you have any photographs of yourself on the island?
A I know I used to, but they would be left in that apartment.
Q What other locations did you participate in sexual contact with Ghislaine Maxwell, other than the island?
A Everywhere. New York, Palm Beach.
Q Where in New York?
A The mansion, Jeffrey's mansion.
Q Okay. Anywhere else in New York?

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A Not at her townhouse.
Q Anywhere else in New York?
A No.
Q In Palm Beach?
A At the house in Palm Beach.
Q Anywhere else in Palm Beach?
A No.
Q In New Mexico?
A The house in New Mexico.
Q Anywhere else in New Mexico?
A No.
Q What other countries?
A France, uhm, England. Um -- we also -- I mean, if we're going to talk about other countries we've got to talk about international travel space or plane space or whatever you want to call it because it happened all the time on the planes.
Q Okay.
A Going from different country to country.
Q Where in France did you have sexual contact with Ghislaine Maxwell?
A There's a couple places in France that we used to go to.
Q When you say you used to go to, how many times did you go to France?

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A I think I've been to France three times.
Q All right. How old were you when you went to France?
A I don't know.
Q Did you have a passport when you went to France?
A I would have had to, yes.
Q You did have a passport when you went to France?
A Yes.
Q And you went to France three times, you believe?
A Yes.
Q And when you were in France those three times, how many of those three times did you have sexual contact with Ghislaine Maxwell?
A Every time.
Q And in what locations in France did you have sexual contact with Ghislaine Maxwell?
A The first time that I remember, we stayed at a really fancy hotel.
Q In what city?
A Paris.
Q Okay.
A And it was within the view of the Champs-

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Elysees.
Q Did you have your own room or a separate room?
A We all stayed in the same room, but that room had adjoining rooms to it. So, you know, one hotel room but with different rooms in it.
Q Okay. And anywhere else on that one trip that you went?
A She brought in a redheaded [redacted] girl. She walked up to her in Paris and, you know --
Q In your presence?
A In my presence.
Q Um-hum.
A And she walked up to this [redacted] girl to show me how easy it was for her to procure girls. I wasn't very good at it. And, you know, it was part of my training was to bring in other girls. So she walked up to her. Within five minutes she had her number and that girl came over later that night to the hotel and serviced Jeffrey. I didn't see Ghislaine with her. I just know she told me what happened and Jeffrey told me what happened.
Q So you were not there?
A I did not see it.
Q Okay. When did you have sexual contact

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with Ghislaine Maxwell at this hotel room overlooking the Champs-Elysees?
A Before she picked up the redhead.
Q And was that just you and Ghislaine or was anyone else a participant in that?
A Jeffrey and Emmy.
Q And where else in France did you have sexual contact with Ghislaine Maxwell?
A The south of France.
Q Where?
A I wouldn't call it so much a hotel. I don't know what you'd call it. It had like big townhouse kind of things that you could rent out.
Q Was this on the same trip or a different trip?
A Different trip.
Q Okay. Who else was present for that?
A Well, we were going to Naomi [redacted] birthday party. It wasn't at the birthday party.
Q Right.
A It was before the birthday party.
Q [redacted], you had sexual contact with Ghislaine Maxwell before you went to Naomi [redacted] birthday party?
MR. [redacted]: Form.

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A That's correct.
Q (BY MS. MENNINGER) And who else was present during your supposed sexual contact with Ghislaine Maxwell on this occasion?
MR. [redacted]: Object to the form of the question.
A It wasn't supposed. It actually happened. And Ghislaine was present, Jeffrey was present. I believe Emily Taylor was present as well.
Q (BY MS. MENNINGER) Anyone else?
A There was someone else on that trip with us, but they weren't involved with the sexual activity at that time.
Q Okay. And what was the other location in France?
A I believe the same exact place. I mean, we stayed there for a few days.
Q Okay. So the three locations are hotel in Paris, same place, same place?
A Correct.
Q And the second and third same places were on the same trip?
A Same trip.
Q Okay. And then you had a third trip to France where you did not have sexual contact with

Ghislaine Maxwell?

MR. [redacted]: Form.

A I believe -- it's hard for me to remember. I remember going to quite a few different countries on that trip. I don't know if it was -- I don't know if we did it in Paris or not, to be honest. We did it in other places. But I've been to Paris three times -- or not Paris, sorry, France.

Q (BY MS. MENNINGER) Okay. All right. When did you first tell your parents that you would be traveling with Jeffrey Epstein?

A I'm not too sure when I actually told them.

Q How long after you were working with Jeffrey Epstein did you travel with him?

A Well, I know my first trip was to New York. I would say anywhere between six weeks -- I would say after six weeks.

Q You were -- you had known Jeffrey Epstein for six weeks before you started traveling with him --

A I believe.

Q -- am I understanding that correct?

A I believe so. I mean, that's an approximate answer.

Q And your first trip was to New York?

A Yes.

Q And did you just go to New York and come back or did you go somewhere else?

A I think I just went to New York, but I can't remember if we went somewhere else.

Q Okay. And did you tell your parents you were going to New York?

A Yes.

Q And do you recall any part of your conversation with your parents about going to New York?

A I didn't get into details about what I was having to do with Ghislaine and Jeffrey. I didn't tell them that, but I told them I was going to New York.

Q And you don't recall telling them anything else about it?

A I don't know. I mean, I might have called them from New York and told them it was cold and, you know, just simple stuff. But I can't really recall what I spoke to them about.

MS. MENNINGER: As I understand it, the food is here. So I'm going to suggest that now is a good time to take a break.

MR. [redacted]: Sounds good.

MS. MENNINGER: All right.

THE VIDEOGRAPHER: We're off the record at 12:42.

(Recess taken from 12:42 p.m. to 1:21 p.m.)

THE VIDEOGRAPHER: We're back on the record at 1:21.

Q (BY MS. MENNINGER) All right. [redacted], I want to talk to you about where you were living in the late '90s. Do you recall -- you testified earlier, I believe, that you were living at your parents' house and you gave us an address at the time you started at Mar-a-Lago.

A Yes.

Q Do you remember where you lived previous to living at your parents' house at that time?

A Like I said, I was a runaway, so there was a lot of different places I lived. One of the places I lived was, like I told you earlier, with Michael's parents. That was somewhere around Fort Lauderdale, I believe, maybe a little bit outside of it.

Q Okay.

A Michael got an apartment and I lived in Michael's apartment for a short period.

Q And where do you recall that being?

A Somewhere in Fort Lauderdale, again.

Q Okay. And then you were living with your parents or was there another place in between?

A Then I lived with my parents.

Q Okay. And then where is the next place that you moved?

A An apartment that Jeffrey got for me in [redacted] Palm Beach.

Q Okay. And you don't know the address of that?

A No, I wish I could give it to you. I don't know it.

Q And you stayed in that apartment until you left for Thailand in the fall, later in the year in 2002, correct?

A Yes.

Q Right?

A Yes.

Q All right. And when did you first stop living with your parents? How old were you when you first stopped living with your parents?

MR. [redacted]: Object to the form.

A The very first time?

Q (BY MS. MENNINGER) Um-hum.

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A I believe I was 11.
Q Okay. What caused you to stop living with your parents when you were 11?
A I just had some trouble and my parents thought it would be better if they sent me to California.
Q Okay. What trouble did you have?
A It's very hard for me to talk about. There was stuff that went on in my life that, you know, made me so I -- I couldn't live with my parents anymore.
Q What went on in your life that caused you to not be able to live with your parents at the age of 11?
A Do I have to answer this?
Q Well, did you talk to Sharon Churcher about being molested as a child?
A I did.
Q And you authorized Sharon Churcher to publish that in a newspaper, correct?
A I don't think I authorized her to do it. I think she -- I wouldn't say she did it on her own accord. But I talked to her about it and I wasn't aware of exactly what she was going to publish and what she wasn't.

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Q So you were able to talk to a reporter for the Mail On Sunday about this, correct?
A I did tell her a little bit about my past and where I came from.
Q All right. So what caused you to be sent away from your parents' home at the age of 11 to California?
A Some of the prior abuse which led me to be a very troubled young teenager. I mean, I guess you wouldn't call 11 a teenager yet, but led me to running away a lot and -- and my family just thought it was best that I get out of the area and move somewhere else.
Q Okay. You had run away prior to being the age of 11?
A Yes.
Q All right. Was that reported to the authorities?
A That I ran away?
Q Yes.
A Yes.
Q And where were your parents living at the age of 11?
A The same address I gave you earlier.
Q Okay. So the authorities associated with

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Loxahatchee, Florida were made aware that you had run away from home at the age of 11?
A Yes.
Q And what abuse had you suffered prior to the age of 11?
A There was a very close family friend who was a very sick man. And he took advantage.
Q What's his name?
A Forest.
Q Forest what?
A [redacted].
Q And where is Forest [redacted] today?
A I don't know where he is.
Q Does anyone in your family keep in contact with him?
A No.
Q What did he do to you?
A Um, he touched me places I shouldn't be touched. He sexually abused me.
Q For how long?
A I don't know how long.
Q Did you tell that to your parents?
A They know.
Q How do they know?
A I told them.

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Q Did you tell them when you were under the age of 11 or at the age of 11?
A I told them later.
Q When did you tell them?
A It took me a long time to forgive my parents for sending me away. I didn't feel like anybody understood me. So not until later in my life did I feel like I was able to talk to anyone about it.
Q Okay. Was it reported to the authorities?
A No. I went too late to talk to anybody about it.
Q Did the event of you being molested cause your parents to split up?
A I think Sharon reported that, but I don't think that's the case, no. My parents split up because they were really messed up.
Q Your parents split up because they were really messed up?
A [redacted], they just didn't get along. There were a lot of marital problems.
Q When did they split up?
A I don't really remember what year it was.
Q How old were you?
A I believe I was living with Jeffrey at the

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time.
Q With whom did you live in California?
A My Aunt Carol.
Q And who else?
A Uncle Mike.
Q And with who else?
A That's it.
Q And for how long did you live with them?
A I don't really know how long, maybe over a year, maybe two years.
Q And then what caused you to not live with them anymore?
A I kept running away from them, too.
Q And where did you live in California?
A I'm sorry?
Q Where in California did you live?
A Where did they live?
Q Where did you live with them?
A Salinas.
Q And do you know the address?
A No.
Q Do they still live there?
A No.
Q When did they stop living there?
A I don't know. I haven't kept in contact

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with them.
Q And you believe you lived with them for a little more than a year?
A Maybe a year, maybe two years. I'm not too sure.
Q Did you go to school there?
A Yes.
Q Where did you go to school?
A Somewhere near Salinas, I'm assuming.
Q What grade were you in?
A Middle school.
Q Sixth grade, seventh grade?
A I think sixth grade.
Q And did you go there for more than one year or just one year?
A Maybe -- I don't know. I'm sorry, I don't know.
Q Were the authorities in Salinas alerted to the fact that you ran away from home there?
A Yes.
Q How long was the longest you were away from home in Salinas, California?
A Two weeks.
Q And you were in middle school?
A (Indicating.)

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THE REPORTER: I'm sorry, your --
Q (BY MS. MENNINGER) Yes? Yes or no?
A [redacted]. Yes.
Q And then when did you go back to Florida?
A I don't know.
Q Was your younger brother living with your parents in Florida while you were in California?
A Um-hum, yes.
Q And was your older brother living with your parents in Florida while you were in California?
A I don't think so.
Q How much older than you is he?
A Five years.
Q And when you went back to Florida, where did you go to school, when you got back?
A I believe I went to Crestwood Middle School.
Q And did you complete your studies at Crestwood Middle School?
A Did I get out of middle school there, yes.
Q Okay. What grades were middle school?
A Six, seven and eight.
Q Okay. And when you went back to live with your parents again, that was at the same address in Loxahatchee?

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A Yes.
Q And you don't believe your older brother was in the home at the time?
A No, he was sent to boarding school.
Q Where did he go to boarding school?
A Washington.
Q State or city?
A Washington above California.
Q When was the next time you stopped living with your parents?
A They sent me to a group home called Growing Together.
Q Why?
A Because I kept running away.
Q Were the authorities alerted when you ran away?
A Yes.
Q And how old were you when you went to live at Growing Together?
A I don't know. It's hard for me to piece back dates. Off the top of my head -- I don't want to guess. I don't think I should guess. I don't know.
Q But you moved directly from living with your parents to living at Growing Together?

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A I wouldn't say directly.
Q How --
A I'd say I stayed with my parents for -- like, I think I finished school at Crestwood. So I would have been in, I don't know, I guess eighth grade, finished eighth grade. And then -- I don't know. I really don't know. Around eighth grade.
Q You went to Growing Together?
A I think -- I think it was then.
Q And how many years did you live at Growing Together?
A Over a year.
Q Were you ever in [redacted] care?
A What Growing Together was, was like a group home that sent you away to [redacted] parents every night.
Q So you lived in other people's homes during the period of time you were assigned to Growing Together?
A Well, you stayed at Growing Together during the day and then at night you get sent home with parents.
Q Did you go to school while you were at Growing Together?
A Yeah, they offer education there.

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Q So the education was at Growing Together?
A Yeah.
Q You did not attend a Palm Beach County --
A I did, but you had to earn your levels up to be able to go outside. So I don't remember what level you have to get up to, to go out to another school. I think there was like seven levels or something. And you had to make it to, like, level 4 to be able to go to outside school.
Q So for some period of time you were assigned to Growing Together and you were going to school at Growing Together. And for some period of time you were going to other schools and coming back to Growing Together?
A Correct.
Q And then when you came back to Growing Together, you were sent to spend the night at a family's home?
A Yes.
Q So you never slept at Growing Together?
A No.
Q Did you live -- other than living at or staying at Growing Together during the day and sleeping at these other homes at night, is there anywhere else that you recall living in the period

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between the ages of eighth grade and when you started working at Mar-a-Lago?
A Besides the ones I've told you about, you know, I did run away from Growing Together quite often. And I did end up being -- being abused by another older guy who I stayed with for I don't know how long.
Q How old were you then?
A I don't know. I'm sorry. I really wish I could pinpoint dates. I don't know dates.
Q Okay. What was that man's name?
A Ronald Effinger.
Q And how long were you living -- were you living with Ronald Effinger?
A Yes.
Q And for how long were you living with him?
A I don't know.
Q Days? Weeks? Months?
A I don't know. I mean, it wasn't days. I don't think it was weeks. It would have been close to maybe a few months.
Q Okay. And was Ronald Effinger prosecuted by federal authorities in South Florida?
A Yes.
Q And you were located by the FBI, I

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believe?
A Yes.
Q And you gave an interview to the FBI concerning your time with Ronald Effinger, correct?
A Yes.
Q Did you ever get a victim's notification letter regarding your status as a victim in Ronald Effinger's federal criminal prosecution?
A I don't know. My parents handled everything.
Q Do you know if your parents received such a letter?
A I don't know.
Q Have you ever asked them?
A No, I've never really brought it up with them. It really pissed them off a lot, so I never brought it up with them.
Q It pissed them off that you were living with Ronald Effinger?
A Yes.
Q Why did it piss them off, if you know?
A Well, I think they were just disgusted, you know, that this happened to me again. And they didn't want to talk about it. They didn't want to talk about it.

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Q But they were aware of it?
A Yes.
Q Your dad came and picked you up from the police station?
A Yes.
Q And your dad would not let you come home?
A Well, I think it was more my mom didn't want me to come home.
Q Did she say why?
A She just probably thought I was just going to keep running away again. And --
Q Did she say that to you?
A Well, I asked my dad at the police station if I could come home instead of going back to Growing Together. And he said my mom didn't want me to come home. And I told him if he didn't get me out within a week, I'd run away again and he'd never hear from me again.
Q And how is it that you came back to be living at their house, then?
A I ran away again and I called him up and I said, This is your final chance. And they came and picked me up and they let me live there.
Q And when did you go live with Michael?
A Not long after that.

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Q And when did you live with Michael's parents?
A Well, I lived with Michael's parents before I lived with Michael in his apartment.
Q And that was an apartment that Michael rented?
A Michael and his friend. I can't remember his friend's name. Mario, I think his friend's name was.
Q When did you live with Tony and Crystal [redacted] as parents?
A That was just a brief stint. I didn't really stay there very long, but it was -- I was a runaway. That's in between times of -- I don't know.
Q How old were you?
A I don't know.
Q I just want to be clear. Michael rented an apartment that you moved into that he had rented, correct?
A Correct.
Q And that was after you had lived with Michael and his parents, correct?
A Yes.
Q And that was prior to you and Michael living with your parents when you started working at Mar-a-Lago, correct?
A Yes.
Q Do I have that sequence right?
A So far, yes.
Q And when did you stop living at your parents' at the time you started working at Mar-a-Lago? How long after you started at Mar-a-Lago do you stop living with your parents?
A I don't know exact dates. I was traveling with Jeffrey a lot, and I was making -- he was giving me lots of money for the sex that I had with him and Ghislaine.
And after, I would say, a short time -- I'm not too sure, darling, I don't know.
Q All right. Can you --
MS. MENNINGER: I have no recollection of which number we're on in terms of exhibit.
MS. RODRIGUEZ: 15.
Q (MS. MENNINGER) Okay. I'd like to mark as Defendant's Exhibit 15 a document and see if you can identify it.
Actually, before I do that, when do you recall ever getting a passport?
A I got my passport in New York. I don't know what age I was.

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Q Okay. And did you -- how did you get it? Did you go somewhere or what happened?
A Jeffrey had me fill out paperwork and go to a Kodak shop or something similar of a Kodak shop and get my picture taken. I gave him my picture and my paperwork. He sent it away. And I think a week later he said he got it expedited.
Q Did you physically go to an office in New York?
A Jeffrey's office.
Q An office associated with Immigration or Homeland Security or whatever it was called back then?
A Not that I recall.
Q And do you know how old you were?
A No. I don't know how old you have to be to get a passport, so I'm not too sure.
(Exhibit 15 marked.)
Q (BY MS. MENNINGER) Okay. I'm going to show you Defendant's Exhibit 15.
Do you recognize this document?
A Yes.
Q Is this document the passport application that you filled out?
A Yes.

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Q Is it in your handwriting?
A Yes.
Q All right. What did you put down as your address at this time to mail the passport to? It's about the second line -- third line.
A Number 13?
Q Well, the third line says, Mail passport to. What address did you put down?
A Are we talking about number 13, Permanent address, do not list P.O. box, street?
Q No, I'm talking about the third line in the entire thing that says, Mail passport to.
A [redacted], I'm sorry, up here, the [redacted]
Q All right. So you asked to have the passport mailed to you at your parents' address, right?
A I don't know if it was mailed to my parents' house, but that's the address I sent -- put down, yes.
Q Okay. And if you look a little bit further to the right, roughly equal with that line, do you see a date that's stamped on there?
A Yeah, January 12th, 2001.

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Q Okay. And then if you go down a little bit further, as you pointed out, line number 13, you gave your permanent address as your parents' address, again, correct?
A Correct.
Q If you look at box number 12 where it asks for occupation, what did you write down?
A Masseuse.
Q Okay. If you look at line number 18, Have you ever been issued a U.S. passport before, what did you put down?
A No.
Q All right. And if you go down a little bit further than that, emergency contact, who did you put down?
A James Austrich, who is Michael.
Q Okay. So is that the fiancé you were talking about earlier?
A Yes.
Q In January of 2001 were you still his affianced?
A Looks like it, yes.
Q And what address did you put down for James Austrich?
A It's kind of hard to read. I think that's

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a 3. I think it's [redacted]. I really can't make out the telephone number.
Q Okay. Do you see Relationship? Can you read that?
A Friend.
Q Okay. Do you see just below that there's a line that says number 21?
A Do not stop -- sorry, Do not sign application until requested to do so by administrating an oath.
Q Okay.
A Applicant's signature age 13 or older.
Q [redacted], it's by the signature line?
A Yeah.
Q And that's your signature?
A Yes.
Q All right. And this is the document that you recall filling out for your first passport?
A I don't recall doing it, but yes, it's in my handwriting and it's got all of my information on it.
Q Okay. And on line -- box 23 it's got your driver's license checked off, right?
A July 23. Yeah, I really can't make out

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numbers and stuff, though.
Q But the box, Driver's License is checked off?
A Yes.
Q Okay. And then if you look in the lower right-hand corner of the page, do you see what we call a [redacted] stamp number? I don't know if you know what that means.
A No.
Q Just the lower right-hand corner of the document.
A [redacted] 004721?
Q Okay. Thank you.
So at January 2001 was James Austrich living at Bent, I think you said, Cak Circle?
A Well, he would have had to have been if I put it down there.
Q Okay. Was that the apartment that he had rented?
A No, it's in [redacted] Palm Beach. The apartment he rented was in Fort Lauderdale. So this could be my apartment that he lived at with me.
Q Okay. So his apartment where he lived with you was in [redacted] Palm Beach?
A Yes.

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Q And he rented that apartment?
MR. [redacted]: Object to the form. Mischaracterization.
A He lived there with me for a short period. I don't -- I don't know how long he lived there with me for.
Q (BY MS. MENNINGER) And who rented the apartment?
A Well, Jeffrey paid for the apartment. I was the occupant, and he was an occupant.
Q Did you ever see the lease?
A Yes, I believe I had to sign the paperwork saying that I was living there.
Q So you were living at -- is it [redacted]
A I can't honestly read it. It looks like a C-a-c (sic), but that doesn't make sense.
Q So January of 2001 you signed a document under oath putting James Austrich's address at Bent something Circle, right?
A Yes.
Q And you put your permanent address and your mail your passport to at your parents' address --
A Yes.

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Q -- is that right?
And it's your position that that is the apartment that Jeffrey paid for and you signed a lease?
A Yes, Jeffrey paid for it and I think I had to sign something that said I was going to occupy it. I don't know if James ever did.
Q Okay. And you stayed at that apartment from at least January 2001 until you left in the fall of 2002, right?
A I would say before then, yes. Like I said, I can't really tell you the exact date that I moved there, but --
Q Why did you have your passport sent to your parent's house if you weren't living at your parents' house?
A Um, I don't know. I guess a fail-safe. I'm not too sure.
Q When was the next passport that you got?
A I think I had to reapply for one in -- well, this one expired in 2002. So I would have had to apply for another one.
Q I'm asking do you remember when you got another passport?
A This expired January 10th, 2002.

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Q Let me have you put the paper down.
A Yes.
Q Do you recall applying for another passport?
A No.
Q Okay. Do you recall ever applying for another passport, ever?
A Well, yeah, when I got to Australia I had to -- I don't have it on me right now, but I could tell you it's -- I had to apply for another one because the other one ran out as expiree.
Q So whenever one expired, you applied for another one from the U.S.?
A (Indicating.)
Q Have you ever gotten --
Is that right?
A Yeah.
Q Have you ever gotten a passport from Australia?
A An Australian passport?
Q Right.
A No.
Q Have you ever lost a passport and had to get one replaced?
A I don't think so.

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Q When was the first time that you came back to the U.S. from Australia?
A October 16th, 2013.
Q And did you come back before that?
A No.
Q Did you ever tell Sharon Churcher or Sharon [redacted] or Marianne Strong that you were going on a trip to New York in 2011?
A No.
Q Is it your contention that Ghislaine Maxwell sexually trafficked you to famous people?
A If you have a document in front of you that you could show me so I could see what you're talking about, yes.
Q I'm asking you, is it your contention that Ghislaine Maxwell sexually trafficked you to famous people?
A Could you be more specific, like are we talking about rock stars or royalty or --
Q Politically connected and financially powerful people.
A Yes.
Q Okay. To whom did Ghislaine Maxwell sexually traffic you?
A You have to understand that Jeffrey and

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Ghislaine are joined hip by hip, okay? So they both trafficked me. Ghislaine brought me in for the purpose of being trafficked. Jeffrey was just as a part of it as she was. She was just as a part of it as he was. They trafficked me to many people. And to be honest, there is people I could name and then there's people that are just a blur. There was so much happening.

Q Okay. Please name a person that Ghislaine Maxwell directed you to go have sex with?

A Prince Andrew.

Q Okay. Who else?

A As a whole, they both trafficked me to people. It was under both of their direction. So it's not easy just to say Ghislaine. When I say they, I mean both of them.

Q Okay. Well, I need you to say a time when Ghislaine Maxwell directed you to go have sex with another person. So can you please tell me to whom Ghislaine Maxwell asked you to go have sex with another person?

MR. [redacted]: Object to the form.

A Glenn [redacted].

Q (BY MS. MENNINGER) Who else?

A I'm going to continue to tell you that

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they both directed me to do it. It was part of my training. They both told me, you've got tickets to go here. This is who you're meeting, and this is what you're doing.

So [redacted] is another one.

Q Ghislaine Maxwell directed you to go have sex with [redacted]?

MR. [redacted]: Object to the form to the extent it mischaracterized her testimony.

A I'm trying to tell you that they both did, Ghislaine and Jeffrey both directed me. They both paid me and they both directed me.

Q (BY MS. MENNINGER) All right. When did Ghislaine Maxwell direct you to go have sex with [redacted]?

MR. [redacted]: Object to the form. Same objection.

A I don't know the time. I don't -- you know, I could tell you the place. I don't know the time.

Q (BY MS. MENNINGER) What words did Ghislaine Maxwell use in talking to you and asking you to go have sex with [redacted]?

A We're sending you to a gentleman. We want you to show him a good time. We want you to do

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exactly what you would do for Jeffrey to him. Keep him happy. I can't remember her exact words, and I'm not going to put words in my mouth to make it sound like what she said. But it was all along those lines.

Q Those are words that Ghislaine Maxwell used to you in directing you to go have sex with [redacted]

MR. [redacted]: Object to the form. Mischaracterized her testimony.

A Along those lines, yes.

Q (BY MS. MENNINGER) Okay. Where were you located when she used those words with you?

A It could have been Palm Beach. It could have been New York.

Q You don't recall?

A I don't recall.

Q Okay. How old were you when she used those words to you?

MR. [redacted]: Object to the form. Mischaracterizes her testimony.

A I don't know. I would think I was 17.

Q (BY MS. MENNINGER) But you're not sure?

A Well, it was in the beginning, like after my training. Glenn [redacted] and [redacted] were

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the two first people I was sent out to.

Q Okay. Well, I was asking about [redacted] okay?

A Right. That's what I'm saying. If you want me to categorically tell you when it happened and why I think I was 17, because those were the two first people I was sent to.

Q So you don't actually recall the conversation regarding [redacted]? You don't recall where you were, right?

A I can't picture if it was New -- I know it was either New York or Palm Beach. I don't remember exactly which one.

Q You don't recall exactly what words were used by Ghislaine Maxwell in speaking to you, correct?

A I remember the tone that she used, the type of words that she used. I can't word for word replay what she said.

Q All right. And so when in time was [redacted] relative to Prince Andrew?

A [redacted] was months, six months, I'm not too sure.

Q Six months what?

A Before Prince Andrew. I don't know, I

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think I met Prince Andrew in 2001. And Glenn [redacted] and Stephen Kaufmann were, like I said, the first people I was sent out to after my training. So I don't know. I'm not going to give you an exact time if I don't know it.

Q I asked you the relative order.

A And I'm trying to give you it.

Q And where does Alan Dershowitz fit into that group of people?

A Same. I can't tell you piece by piece by piece who -- I know Glenn [redacted] was first.

Q Okay.

A And I know Stephen Kaufmann was one of the first I was sent to. Alan Dershowitz could have been between there. Between, sorry, between Glenn and Stephen. The first time I was with Alan Dershowitz was in New York, so I wasn't actually sent to him. It actually happened at one of Jeffrey's residences.

(Ms. McCawley left the deposition.)

A So it's very hard for me to chronologically give you each person individually.

Q (BY MS. MENNINGER) Okay. Name the other politically connected and financially powerful people that Ghislaine Maxwell told you to go have sex with?

A Again, I'm going to tell you "they"

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because that's how it went. They instructed me to go to [redacted] Mitchell, Jean Luc Brunel, Bill [redacted], another prince that I don't know his name. A guy that owns a hotel, a really large hotel chain, I can't remember which hotel it was. Marvin Minsky.

There was, you know, another foreign president, I can't remember his name. He was Spanish. There's a whole bunch of them that I just -- it's hard for me to remember all of them. You know, I was told to do something by these people constantly, told to -- my whole life revolved around just pleasing these men and keeping Ghislaine and Jeffrey happy. Their whole entire lives revolved around sex.

They call massages sex. They call modeling sex. They call --

Q I asked you the names for people. Are you going to tell me any other names or is that all of them?

A I'm trying to think. That's the answer I'm trying to give to you. It's that it's so hard to just keep naming and naming and naming.

Q All right.

A A lot of times I would be introduced to them. I didn't know --

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Q If you're going to tell me more names, please continue your answer.

A I'm trying to think.

Q If you're just going to talk --

A I'm sorry. I'm trying to think.

Q Okay. Let's take a break and then you can think over the break.

THE VIDEOGRAPHER: We're off the record at 2:01.

(Recess taken from 2:01 p.m. to 2:09 p.m.)

THE VIDEOGRAPHER: We're back on the record at 2:09.

Q (BY [redacted], you have filed a lawsuit against Ghislaine Maxwell, correct?

A Yes.

Q You understand her to be my client, correct?

A Yes.

Q I'm here today to talk to you about your allegations against Ghislaine Maxwell.

Do you understand that?

A Yes.

Q I want you to tell me a single time that you recall Ghislaine Maxwell using words to you and directing you to go have sex with another person --

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MR. [redacted]: Object.

Q (BY MS. MENNINGER) -- not anybody else, Ghislaine Maxwell?

MR. [redacted]: Objection. Asked and answered.

To the extent that she can answer the question, I'd ask that she answer the question.

A I have answered the question. The question that you're asking me is Ghislaine. And Ghislaine and Jeffrey worked together. They were one and the same of persons. They both directed me to do this. They both directed me to report back to them. They were both the same.

Q (BY MS. MENNINGER) You cannot recall a single instance in which Ghislaine --

A I have to --

Q Excuse me.

-- in which Ghislaine Maxwell alone directed you to have sex with another person --

A I have to --

Q -- correct?

A -- believe --

MR. [redacted]

[redacted]. MENNINGER: I am going to finish my question.

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Q (BY MS. MENNINGER) Correct?

MR. [redacted]: Are you finished with your question?

MS. MENNINGER: Now you may make your objection. And then she may answer.

MR. [redacted]: Okay. Objection. Argumentative. Harassing for absolutely no reason. Mischaracterizing the witness's testimony.

Answer, if you can.

A I have given you the names of the people that Ghislaine herself has told me to go be sex trafficked to, along with Jeffrey Epstein, okay?

She's the one who brought me to Jeffrey Epstein to be trafficked in the fucking first place.

So I have given you as much information as I possibly can to let you know what she was about, who she told me to go with, what she wanted me to do. That is what I am stating and that's what I previously stated to you.

Q (BY MS. MENNINGER) And these names that you have just given are people to whom Ghislaine Maxwell alone told you to go have sex?

MR. [redacted]: Objection. Mischaracterization.

A Ghislaine and Jeffrey, I don't know how

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many times you want me to keep answering this question. Both told me to do this, okay? They both sent me to these people.

How many times do you want me to answer this?

Q (BY MS. MENNINGER) I think you're answering a different question so that's why I'm going to ask you again. I am not asking you anything about a time when Jeffrey and Ghislaine together told you to go do something. I'm asking you to name a single time during which Ghislaine Maxwell acting alone directed you to go have sex with another person?

MR. [redacted]: Objection. Asked and answered. Harassing. Argumentative.

A I've given you the names of the people that Ghislaine instructed me to go have sexual relations with. I am not discluding (sic) the fact that Jeffrey also told me.

Ghislaine told me from her mouth to do these things. Jeffrey told me from his mouth to do these things with these people. Ghislaine instructed me to do the things that I did with Jeffrey Epstein on the very first meeting that I had with him. She brought me there under the preclusion (sic) that I

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was going to be trained as a masseuse and that she instructed me to take off my clothes and to give oral sex to Jeffrey Epstein.

Q (BY MS. MENNINGER) Excuse me. I've asked you for the names.

A I've just given you a name. Jeffrey Epstein is a big name.

Q All right.

A She instructed me on that one.

Q So you're saying --

MR. [redacted]: The witness is finishing her answer right now. She's in the process of explaining one of the people Ghislaine told her to have sex with.

Q (BY MS. MENNINGER) So you're saying Ghislaine Maxwell directed you to have sex with Jeffrey Epstein?

A Correct.

Q Ghislaine Maxwell directed you to have sex with Glenn [redacted]?

A Correct.

Q What words did Ghislaine Maxwell tell you to go have sex with Glenn [redacted]?

A It was the same all the time, all right? They want me to go provide these men with a massage.

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And when they say massage, that means erotic, okay? That's their term for it. I think there are plenty of other witnesses that can attest to what massage actually means.

And I'm telling you that Ghislaine told me to go to Glenn [redacted] and give him a massage, which means sex.

Q Okay. So Glenn -- Ghislaine Maxwell told you to go give a massage to Glenn [redacted]?

A Correct.

Q That's your testimony?

A That is my testimony.

Q All right. Ghislaine Maxwell told you to go give a massage to [redacted], correct?

A Correct.

Q Ghislaine Maxwell told you to give a massage to Prince Andrew, correct?

A Correct.

Q Ghislaine Maxwell told you to give a massage to Bill [redacted], correct?

A Correct.

Q When did Ghislaine Maxwell tell you to give a massage to Bill [redacted]?

A I don't know dates.

Q Where were you?

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A When it happened?
Q When Ghislaine Maxwell used the words, Go give a massage to Bill [redacted], where were you?
MR. [redacted]: Object to the form. Mischaracterizes her testimony.
A I can't tell you where we were. I know where I was sent to. I don't know where we were when she told me to do that.
Q (BY MS. MENNINGER) Where were you sent to --
A New Mexico.
Q -- by Ghislaine Maxwell?
MR. [redacted]: Object to the form. Mischaracterizes her testimony again.
A Are you smiling at me because --
Q (BY MS. MENNINGER) No, I'm asking you to answer the question.
A I have answered the question. I was sent to New Mexico.
Q Okay. Where were you sent from?
A I already answered that. I don't know where I was sent from.
Q Okay.
A I was flying everywhere with these people.
Q Where were you sent by Ghislaine Maxwell

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to have sex with Jean Luc Brunel?
MR. [redacted]: Object to the form. Mischaracterized her testimony.
A Many places.
Q (BY MS. MENNINGER) Ghislaine Maxwell sent you to many places to have sex with Jean Luc Brunel?
MR. [redacted]: Object to the form.
A It happened at many places, yes.
Q (BY MS. MENNINGER) You had sex with Jean Luc Brunel at many places is what you're saying, correct?
A I was sent to Jean Luc Brunel at many places to have sex with him.
Q When did Ghislaine Maxwell send you to a place to have sex with Jean Luc Brunel?
A You are asking --
MR. [redacted]: Form.
A -- me to answer the impossible.
Q (BY MS. MENNINGER) All right. When did Ghislaine Maxwell send you to have sex with the owner of a large hotel chain?
MR. [redacted]: Object to the form. Mischaracterization.
A I'm going to keep answering the questions the same way that I keep answering them. I don't

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know where it was when she said to go do this.
Q (BY MS. MENNINGER) Okay. Where were you sent to have sex with the owner of a large hotel chain by Ghislaine Maxwell?
MR. [redacted]: Object to the form.
A I believe that was one time in France.
Q (BY MS. MENNINGER) Which time in France?
A I believe it was around the same time that Naomi [redacted] had a birthday party.
Q Where did you have sex with the owner of a large hotel chain in France around the time of Naomi [redacted] birthday party?
A In his own cabana townhouse thing. It was part of a hotel, but I wouldn't call it a hotel.
Jeffrey was staying there. Ghislaine was staying there. Emmy was staying there. I was staying there. This other guy was staying there. I don't know his name.
I was instructed by Ghislaine to go and give him an erotic massage.
Q She used the words erotic massage?
A No, that's my word. The word massage is what they would use. That's their code word.
Q Was she in the room when you gave this erotic massage to the owner of a large hotel chain?

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A No, she was not in the room. She was in another cabana.
Q And other than telling you to go give the owner of this large hotel chain a massage, do you remember any other words she used to you to direct you in what you should do?
A Not at the time, no.
Q Where did -- where were you and where was Ms. Maxwell when she directed you to go have sex with Marvin Minsky?
MR. [redacted]: Object to the form.
A I don't know.
Q (BY MS. MENNINGER) Where did you go to have sex with Marvin Minsky?
A I believe it was the U.S. Virgin Islands, Jeff's -- sorry, Jeffrey Epstein's island in the U.S. Virgin Islands.
Q And when was that?
A I don't know.
Q Do you have any time of year?
A No.
Q Do you know how old you were?
A No.
Q Other than Glenn [redacted], Stephen Kaufmann, Prince Andrew, Jean Luc Brunel, Bill [redacted],

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another prince, the large hotel chain owner and Marvin Minsky, is there anyone else that Ghislaine Maxwell directed you to go have sex with?

A I am definitely sure there is. But can I remember everybody's name? No.

Q Okay. Can you remember anything else about them?

A Look, I've given you what I know right now. I'm sorry. This is very hard for me and very frustrating to have to go over this. I don't -- I don't recall all of the people. There was a large amount of people that I was sent to.

Q Do you have any notes of all these people that you were sent to?

A No, I don't.

Q Where are your notes?

A I burned them.

Q When did you burn them?

A In a bonfire when I lived at Titusville because I was sick of going through this shit.

Q Did you have lawyers who were representing you at the time you built a bonfire and burned these notes?

A I've been represented for a long time, but it was not under the instruction of my lawyers to do

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this. My husband and I were pretty spiritual people and we believed that these memories were worth burning.

Q So you burned notes of the men with whom you had sex while you were represented by counsel in litigation, correct?

MR. [redacted]: Object to the form.

A This wasn't anything that was a public document. This was my own private journal, and I didn't want it anymore. So we burned it.

Q (BY MS. MENNINGER) When did you write that journal?

A Just over time. I started writing it probably in, I don't know, I can't speculate, 2012, 2011.

Q So you did not write this journal at the time it happened?

A No.

Q You started writing this journal approximately a decade after you claim you finished being sexually trafficked, correct?

A Yes.

Q And you started writing a journal after you had a lawyer, correct?

A Correct.

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Q Including Mr. [redacted], who is sitting right here, correct?

A Correct.

Q What did that journal look like?

A It was [redacted].

Q And what else?

A It was just a spiral notebook.

Q Okay. And what did you put into that [redacted] spiral notebook?

A Bad memories. Things that I've gone through, lots of things, you know. I can't tell you. There was a lot of pages. It was over 300 pages in that book.

Q Did you ever show that book to your lawyers?

A No.

Q Did you show that book to anyone?

A My husband.

Q Did you show it to anyone else besides your husband?

A No.

Q Did you tear out pages and give them to Sharon Churcher?

A No, I wrote -- those pages that you're talking about, I wrote for her specifically. She

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wanted to know about the Prince Andrew incident.

Q So that's a different piece of paper?

A Yeah, that's just random paper.

Q So you had a [redacted] spiral notebook that you began sometime in 2011 or 2012 in which you wrote down your recollections about what had happened to you, and you burned that in a bonfire in 2013.

Did I get that right?

A You got that right.

Q And do you have no other names of people to whom you claim Ghislaine Maxwell directed you to have sex, correct?

A At this time, no.

Q Is there any document that would refresh your recollection that you could look at?

A If you have a document you'd like to show me, I would be glad to look at it and tell you the names I recognize off of that.

Q I'm just asking you if there's a document you know of that has this list of names in it?

A Not in front of me, no.

Q Where is the original of the photograph that has been widely circulated in the press of you with Prince Andrew?

A I probably still have it. It's not in my

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possession right now.
Q Where is it?
A Probably in some storage boxes.
Q Where?
A In Sydney.
Q Where in Sydney?
A At some family's house. We got the boxes shipped to Australia, and they were picked up off the porch by my nephews and brought to their house.
Q Which is where?
A In Sydney.
Q Where in Sydney?
A [redacted]
Q And who lives in that house?
A Well, it's owned by my mother-in-law and father-in-law, but my nephews live in the house.
Q What are their names?
A I'm not giving you the names of my nephews.
Q What's the address of the house?
A Why would you want that?
Q I want to know where the photograph is. I'm asking you where the photograph is. And you've just told me it's somewhere in [redacted]?
A Yes.

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Q So where in [redacted] is the photograph located?
A If I can't 100 percent say that the photograph is there, it could be at my house that I presently live in. I'm not going to give you the address of my nephews' residence.
Q When is the last time you saw the photograph in person?
A When I packed and left America.
Q Colorado?
A Yes.
Q All right. So you had that photograph here with you in Colorado?
A Yes.
Q What's on the back of the photograph?
A I'm sorry?
Q Is there anything on the back of the photograph?
A There's like the date it was printed, but no writing or anything.
Q Okay. Does it say where it was printed?
A I don't believe so. I think it just -- I don't remember. I just remember there's a date on it.
Q Whose camera was it taken with?

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A My little yellow Kodak camera.
Q Who took the picture?
A Jeffrey Epstein.
Q And where did you have it developed?
A I believe when I got back to America.
Q So where?
A I don't know.
Q Palm Beach?
A I don't know.
Q What is the date the photograph was printed?
A I believe it's in March 2001.
Q Okay.
A But that's just off of my photographic memory. I don't -- it could be different, but I think it's March 2001.
Q You have a photographic memory?
A I'm not saying I have a photographic memory. But if I'd look at the back of the photo and I remember what it says, I believe it was March 2001.
Q Did the photograph ever leave your possession for a while?
A I gave it to the FBI.
Q Okay. And when did you get it back?
A When they took copies of it.

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Q When was that?
A 2011.
Q When they came to interview you?
A Yes.
Q So from 2011 until you left Colorado it was in your personal possession?
A Yes.
Q What other documents related to this case are in that, storage boxes in Australia?
MR. [redacted]: Object to the form.
A Documents related to this case -- there -- I don't know. I really can't tell you. I mean, there's seven boxes full of Nerf guns, my kids' toys, photos. I don't know what other documents would be in there.
Q (BY MS. MENNINGER) Did anyone search those documents after you received discovery requests from us in this case?
A I haven't been able to obtain those boxes. I can't get them sent back up to me. It's going to cost me a large amount of money. And right now I'm trying to look after my family, so I'm not able to afford to get them up.
Q You live in Australia, correct?
A I do.

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Q Okay. How far away are the boxes from where you live in Australia?
A Sydney is down here at the bottom. Cairns is up here at the top.
Q Okay.
A It's probably a six-day drive.
Q Did you fly here through Sydney?
A No.
Q Have you been to Sydney since you've moved back to Australia?
A I flew into Sydney with my three kids, but it was a connecting flight to Brisbane.
Q Did you ask your nephews or anyone else to search those boxes in response to discovery requests that we issued in this case?
A They are my nephews. I would never let them look at those.
Q Other than your [redacted] spiral notebook, what else did you burn in this bonfire in 2013?
A That was it.
Q That's the only thing?
A Yes.
Q Did you use [redacted]?
A Yes.
Q Charcoal?

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A My husband built the bonfire out of [redacted] and I don't know what else he put in it. He's the one who always makes the fires, not me.
Q Who else was present?
A Just him and I.
Q Were your kids there?
A No. They were inside sleeping.
Q And what beach was this?
A It wasn't a beach. It was in my backyard.
Q What's your address?
A At that time?
Q Um-hum.
A [redacted].
Q [redacted]
A Yes.
Q Who were your neighbors?
A Sweet people. Ray and -- I could look on my phone if you want.
Q No, thank you. Do they still live there?
A Yes.
Q Do you keep in touch with them?
A Last time I talked to them was a few months ago.
Q Did they see the fire?
A They've seen many fires that we've had.

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We've had lots of bonfires there.
Q Did you ever ride in a helicopter with Ghislaine Maxwell acting as pilot of the helicopter?
A Yes.
Q Who else was on the flight?
A I've been on the helicopter with her plenty of times. I can't mention how many people were on the -- on the helicopter at the same time.
Q How many times?
A I don't know. Do you have helicopter records that you could show me?
Q I'm asking you how many times you were on the helicopter with Ghislaine Maxwell acting as the pilot --
A It's impossible for me to answer the question without having the actual physical records in front of me.
Q I'm asking you to look into your memory and tell me how many times you recall being on a helicopter with Ghislaine Maxwell at the pilot seat?
A There is no number I can give you. There's plenty of times I've been on her helicopter.
Q Where did you go from and to on a helicopter?
A I believe it was -- don't quote me on this

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because I get confused on the islands there. I want to say it was St. John's. It could have been St. Barts. St. John or St. Barts, and then we would fly straight to Jeffrey's island.
Q Okay. Did you ever go anywhere else on the helicopter?
A No.
Q Were you ever on the helicopter with Bill Clinton and Ghislaine Maxwell as the pilot of the helicopter?
A No.
Q Were you ever on the helicopter with Bill Clinton's Secret Service and Ghislaine Maxwell as the pilot?
A No.
Q Do you recall telling Sharon Churcher that you were?
A No.
Q Did you see the press article in which Sharon Churcher reported that you were?
MR. [redacted]: Objection. I'd just ask that if you're going to ask this witness about a specific article I'd like for her to see the article. Otherwise she's not going to testify about it.
If you have something to show her, then,

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please.
Q (BY MS. MENNINGER) Do you recall seeing a press article in which Sharon Churcher reported that you were on a helicopter with Bill Clinton and Ghislaine Maxwell as the pilot?
MR. [redacted]: Again, I'll let you answer the question once she's looking at the document that you're being asked about.
MS. MENNINGER: You're not letting her answer a question about whether she recalls a particular press statement?
MR. [redacted]: I will let her answer every question about the press statement as long as she sees the press statement. I'm okay with that. She can answer all of them.
MS. MENNINGER: No, there is a rule of civil procedure that allows you to direct a witness not to answer a question when there's a claim of privilege.
What privilege are you claiming to direct her not to answer this question?
MR. [redacted]: I thought that you wanted accurate answers from this witness. If the --
MS. MENNINGER: I asked her if she recalled something --

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MR. [redacted]: If the sole purpose is to just to harass her --
MS. MENNINGER: I asked her if she recalled something --
MR. [redacted]: Then that's just not going to be what's happening today.
Q (BY MS. MENNINGER) All right. So you're refusing to answer a question about whether you recall a particular press statement --
MR. [redacted]: She's --
Q (BY MS. MENNINGER) -- is that true?
MR. [redacted]: She is not refusing to answer any questions. She --
A I'm not refusing to answer. I just want to see the article you're talking about so I can be clear in my statement.
Q (BY MS. MENNINGER) Do you recall seeing a press article written by Sharon Churcher reporting that you flew on a helicopter with Bill Clinton and Ghislaine Maxwell as the pilot?
A No, I do not recall reading a press article saying that I was on a helicopter with Bill Clinton as Ghislaine is the pilot.
Q Do you recall telling Sharon Churcher that you had conversations with Bill Clinton regarding him flying on a helicopter with Ghislaine Maxwell?

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A I believe that it was taken out of context. Ghislaine told me that she flew Bill Clinton in. And Ghislaine likes to talk a lot of stuff that sounds fantastical. And whether it's true or not, that is what I do recall telling Sharon Churcher.
Q So you told Sharon Churcher that Ghislaine Maxwell is the one who told you that she flew Bill Clinton in the helicopter?
A I told Sharon Churcher that Ghislaine flew Bill Clinton onto the island, based upon what Ghislaine had told me.
Q Not based upon what Bill Clinton had told you, correct?
A Correct.
Q Did you ever ask Sharon Churcher to correct anything that was printed under her name, concerning your stories to Sharon Churcher?
A I wasn't given those stories to read before they were printed.
Q After they were printed did you read them?
A I tried to stay away from them. They were very hard. You have to understand it was a very hard time for me and my husband to have to have this

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public -- we didn't think it was going to be this publicly announced and that big. So we turned off the news and we stopped reading so many things.
Q You didn't read the articles about your stories to Sharon Churcher --
A I've read some articles --
Q Let me just finish. You did not read the articles published by Sharon Churcher about your stories to Sharon Churcher?
A I have read some articles about what Sharon Churcher wrote. And a lot of the stuff that she writes she takes things from my own mouth and changes them into her own words as journalists do.
And I never came back to her and told her to correct anything. What was done was done. There was nothing else I can do.
Q So even if she printed something that were untrue you didn't ask her to correct it, correct?
A There was things that she printed that really pissed me off, but there was nothing I could do about it. It's already out there.
Q She printed things that were untrue, correct?
MR. [redacted]: Objection to the form. Mischaracterization.

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A I wouldn't say that they were untrue. I would just say that she printed them as journalists take your words and turn them into something else.

Q (BY MS. MENNINGER) She got it wrong?

MR. [redacted]: Object to the form. Mischaracterization.

A In some ways, yes.

Q (BY MS. MENNINGER) Did she print things in her articles that you did not say to her?

MR. [redacted]: I object and ask that the witness be given the opportunity to see the document so that she can review it and answer that question accurately. Otherwise she's unable to answer the question. I'm not going to allow her to answer.

MS. MENNINGER: You know the civil rules tell you not to suggest answers to your client.

Q (BY MS. MENNINGER) And you understand your lawyer is now directing you to not all of a sudden remember what your answer is. That's what he's suggesting that you say. So you're not supposed to listen to him suggest that to you. You're supposed to tell me from your memory.

MR. [redacted]: That is not what I'm --

Q (BY MS. MENNINGER) Did you --

MR. [redacted]: That's not what I'm doing.

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You don't get to just talk over me and tell my client when not to listen to me. All you have to do to get answers is show her the document you're talking about, and I'll let her answer every question. I don't know why we're so scared of the actual documents.

MS. MENNINGER: I don't know why you're scared of your client's recollection, Mr. [redacted]. But anyway --

MR. [redacted]: Why would you do this to her?

Q (BY MS. MENNINGER) Did Sharon Churcher print things that you did not say?

MR. [redacted]: I'm going to instruct my client not to answer unless you give her what it is that you're talking about that was printed. And she will tell you the answer, the accurate answer to your question. Just without the document to refresh her recollection and see it, she's not going to answer the question.

Q (BY MS. MENNINGER) Did Sharon Churcher print things that you did not say?

MR. [redacted]: Same objection. Same instruction not to answer.

I think I've made a very clear record as

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to why I want my client to answer all of these questions, but I want her to have the fair opportunity to see this document.

Q (BY MS. MENNINGER) Did Sharon Churcher print things that you felt were inaccurate?

MR. [redacted]: Same objection. Same instruction. If she sees the document, she's going to answer every one of these questions.

Q (BY MS. MENNINGER) Did any other reporter print statements that you believe are inaccurate?

MR. [redacted]: Same objection. Same instruction.

Q (BY MS. MENNINGER) Did any reporter print statements about Ghislaine Maxwell that were inaccurate?

MR. [redacted]: Same objection. Same instruction.

This is harassing. This is harassing a sexual abuse victim. And all I'm asking is for fairness, that we just let her see the document so she can answer this.

[redacted], please stop saying anything other than an objection, what the basis is, or instructing your client not to answer.

MR. [redacted]: I will do that.

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MS. MENNINGER: That's what the Federal Rules of Civil Procedure provide.

MR. [redacted]: I hear you. They also provide for fairness and civility. And all I'm asking, very calmly, is for her to see this.

[redacted], this is not your deposition. I'm asking your client what she remembers. If she doesn't want to talk about what she remembers, then let her not answer. But you cannot instruct her not to answer unless there's a privilege.

What privilege --

MR. [redacted]: I am instructing her not to answer.

Q (BY MS. MENNINGER) All right. You are refusing to answer questions about whether statements to the press about Ghislaine Maxwell attributed to you were inaccurate?

MR. [redacted]: She's not refusing not to answer.

A You are refusing to show me these documents so I could answer properly. I would give you an answer if you were to show me some documents.

Q (BY MS. MENNINGER) You can't say without looking at a document whether the press attributed to

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you is accurate or inaccurate?
A Please show me the document.
Q You can't say from the top of your head whether any inaccurate statement has been attributed to you in the press?
A Please show me a document and I will tell you.
Q Are you refusing to answer my questions about your knowledge of whether inaccurate statements have been attributed to you in the press?
A Are you refusing to give me the documents to look at?
Q Are you refusing to answer the question?
A I am refusing to answer the question based upon the fact that you are not being fair enough to let me see the document in order to give you an honest answer.
Q [redacted] --
A Yes.
Q -- we are talking about press that has been published on the Internet, correct?
A Yes.
Q Do you have access to the Internet?
A Yes.
Q Have you looked on the Internet and read

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articles that attribute statements to you about Ghislaine Maxwell?
A Yes.
Q Do you know any statement that has been attributed to you in a press article on the Internet about Ghislaine Maxwell that is untrue?
MR. [redacted]: Same objection. Same instruction.
A Please show me a specific document.
Q (BY MS. MENNINGER) Do you know of any such statement about Ghislaine Maxwell attributed to you by the press that is inaccurate?
A If you could please show me a specific document.
Q Tell me what Sharon Churcher asked you to write for her.
A Any knowledge that I had about my time with Prince Andrew.
Q And did you write it?
A Um-hum.
Q What did you write it in or on?
A Paper.
Q What kind of paper?
A Lined paper.
Q Was it in a book or single sheets?

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A Single sheets.
Q And did you write a long document or a short document? What was it?
A I can't recall how long the document was, but I would say it would be a few pages.
Q And other than asking you to write whatever you remember about Prince Andrew, did she give you any other directions about what you should write?
A She was interested in two things, really. How Epstein got away with so many counts of child trafficking for sex and how Prince Andrew was involved in it. Those were her two main inquiries.
Q What did she ask you to write?
A She asked me to write about Prince Andrew.
Q Did she tell you to put it in your own handwriting?
A No, she just asked me to write down what I can remember.
Q Did you give her everything that you wrote?
A Did I give her the whole entire pages that I wrote?
Q Yes.
A Yeah, I wrote pages for her specifically.

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Q In your own handwriting?
A In my own handwriting.
Q And what you wrote, was that true?
A Yes.
Q And did you get paid for those pieces of paper?
A Not for the papers, I don't believe.
Q Okay. Have you gotten paid when they've been reprinted?
A No.
Q Have you negotiated any deal with Radar Online?
A No.
Q Have you negotiated any deal with Sharon Churcher for the purpose of publishing those pieces of paper?
A Not those pieces of paper.
Q When did you write those pieces of paper?
MR. [redacted]: Object to the form.
A A week before she came out.
Q (BY MS. MENNINGER) And when did you give them to her?
A When she came out.
Q When was that?
A Sometime, I believe, in early 2011.

Q What did you get paid for, if not for those pieces of paper?

MR. [redacted]: Object to the form.

A I was paid for the picture with Prince Andrew with his arm around me, Ghislaine in the background. And I was paid for the, I guess, the print of the stories.

Q (BY MS. MENNINGER) Anything else?

A No.

Q You were not paid for those pieces of paper?

A No.

Q All right. And how many pieces of paper did you write?

A Like I said, I'm rounding it around three.

Q Three pieces of paper?

A That's what I -- I don't remember to be exact on a number. I'm sorry. But over three pages.

Q And you wrote those sometime in 2011?

A The week that she was coming out to see me.

Q And you gave them to her, right?

A I gave them to her.

Q Did you keep a copy of that?

A No.

Q Did you rip them out to make them look like they came out of a journal?

A No.

Q Were you directed to make them look like they came out of a journal?

A No.

Q Do you know why your lawyer would have told the federal judge in New York that that's what you did?

MR. [redacted]: Object to the form.

A My lawyer in New York?

Q (BY MS. MENNINGER) Um-hum.

A Ripped them out of a journal?

Q Said that you had. Do you know why she would have said that?

A Maybe she thought that I did.

Q But you didn't?

A They were just pieces of paper written for Sharon Churcher's purpose.

Q And not directed to look like they came from a journal?

A Nobody told me to make them look like they came from a journal. They were just pieces of paper that I wrote down for Sharon Churcher.

Q Did Ghislaine Maxwell tell Prince Andrew that you were 16 years old?

A No. I think -- I think they had played the guessing game and I was 17.

Q And so Ghislaine Maxwell did not tell Prince Andrew that you were only 16?

MR. [redacted]: Object to the form. Speculation.

Q (BY MS. MENNINGER) In your presence?

A I don't remember the exact conversation. I just remember they liked to play the guessing game a lot.

Q And so you don't recall Ghislaine Maxwell telling Prince Andrew in your presence that you were quote, only, really only 16, right?

A Correct, I don't remember that.

Q And if that were in the paper, that would be untrue, correct?

A Correct.

MS. MENNINGER: I think now might be a good time for a break.

THE DEPONENT: Thank you.

MR. [redacted]: Okay. Sounds good.

THE VIDEOGRAPHER: We're off the record at 2:45.

(Recess taken from 2:45 p.m. to 2:55 p.m.)

THE VIDEOGRAPHER: We're back on the record at 2:55.

Q (BY MS. MENNINGER) Do you have any photographs of yourself either nude or in a sexually compromising position that you claim were taken by Ghislaine Maxwell?

A I do not have any of those in my evidence. But if you ask Ghislaine Maxwell, she would have plenty.

Q Do you have any in your storage boxes in Sydney?

A No.

Q Do you know whether your attorneys have any such photographs that you claim were taken by Ghislaine Maxwell?

A No.

Q You don't know or they don't have them?

A I don't know. And I don't think they have them. If they had them, they would have told me. You should ask your client. She's got plenty of them.

Q What type of camera did Ghislaine Maxwell use?

A It was a black camera. And it had a, I don't know the types and names of them, but the lens

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that goes out.
Q Was it digital or single reflex?
A Again, I don't know types of cameras. I mean, I use my phone for using a camera. So it's a black camera and it had a lens that you could put out further or bring back.
Q Did you ask her to take any photographs of you?
A No. She asked to take photographs of me.
Q Was it a film or a digital camera?
A I never saw how she printed them out.
Q What's the first time you told anybody that you had been sexually trafficked?
MR. [redacted]: Form.
A Tony [redacted], my ex-boyfriend, knew some of the stuff that was happening, though I did not go in great detail to him, being that he's my boyfriend. And then the first person I really opened up to about everything was my husband.
Q (BY MS. MENNINGER) Did you tell Tony [redacted] that you were forced to have sex with Jeffrey Epstein?
A Yes.
Q Did you tell Tony [redacted] you were forced to have sex with Ghislaine Maxwell?

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A Yes.
Q Did you tell Tony [redacted] that Ghislaine Maxwell sent you to have sex with famous people?
A Yes.
Q When did you tell Tony [redacted] that?
A During conversations. Like, I'd call him from places that I was at and just talk to him. And like I said, I wouldn't get into great detail about things. But, you know, I had to be with this person or that person today and --
Q Did you tell Tony [redacted] not to call the police?
A No. Tony enjoyed his lifestyle with me. So he wouldn't have gone to the police.
Q Did you tell James Michael Austrich that you were sexually trafficked?
A You know, I don't know what I told Michael at the time. I know he asked me and I think I told him, but I didn't get into detail with him.
Q What do you think you told him?
A That I wasn't just massaging these people.
Q Did you tell him what you were doing with Jeffrey Epstein?
A Yes.
Q Did you tell James Michael Austrich what you were doing with Ghislaine Maxwell?

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A Yes.
Q Did you tell him what you were doing to other people?
A I don't think I told him about many other people, no.
Q What people did you tell him about?
A Mainly Ghislaine and Jeffrey.
Q When did you tell him that?
A From the start.
Q When was the start that you told him?
A From, I wouldn't say the first meeting, but I told him around that time.
Q And what did Michael Austrich tell you to do?
A He didn't mind what I had to do. Again, he was another guy that used me because I made lots of money, and he didn't tell me to do anything.
Q Did he tell you not to tell the police?
A No, he didn't tell me not to do anything.
Q Did he tell you to tell the police?
A Again, he told me not -- he didn't tell me to do anything.
Q When did you tell your parents that you were sexually trafficked by Jeffrey Epstein?

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A After I had my kids.
Q When did you tell your parents that you were sexually trafficked by Ghislaine Maxwell?
A I told them the same time about Jeffrey and Ghislaine. So sometime after I had my children.
Q After you had had all three children or after you had your first child?
A I think after I had all three of my children.
Q What was the last year in which you had a child?
A 2010.
Q So you believe you told your parents sometime after 2010 that you had been sexually trafficked?
A Yes.
Q You didn't tell your parents that you had a lawsuit entitled Jane Doe 102 versus Jeffrey Epstein in 2009?
A I wasn't very close with my parents.
Q Why not?
A We just had a hard relationship.
Q Why?
A Because we did. I don't know why. Some people just don't get along.

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Q Do you get along with your parents now?
A I get along with my parents now, yes.
Q Okay. Have you ever told anyone that you were a sex slave for four years?
A Under the assumption that I got my dates wrong, yes, I probably have.
Q And that's not true, correct?
A Not because I didn't mean it to be true. Just because I didn't know my dates.
Q So four years is not two years, correct?
MR. [redacted]: Object to the form.
A Four years is not two years.
Q (BY MS. MENNINGER) What did your parents say when you told them that you had been sexually trafficked by Jeffrey Epstein and Ghislaine Maxwell?
A I believe they were disgusted.
Q What did they tell you to do or to not do?
A I don't remember the exact conversations that we had, but they weren't happy.
Q Were they both on the phone at the same time?
A No.
Q Who was on the phone first?
MR. [redacted]: Object to the form.
A I don't know.

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Q (BY MS. MENNINGER) You were in Australia at the time, correct?
A Yes.
Q They were not?
A Yes.
Q Have they ever been to see you in Australia?
A My dad has.
Q Has your mom ever been to see you in Australia?
A No, my mom is afraid of flying.
Q When did your dad come to see you in Australia?
A The birth of my son, my first one in 2006. And then, I believe in 2010 when my daughter was born.
Q And did you have this conversation with your dad about this in person or on the phone?
A I've had conversations with him about it since.
Q I'm talking about the first time you had a conversation with your dad.
A On the phone.
Q What caused you to tell him in 2010?
A I was just starting to accept what I had been through. I think for ten, however long many years, I mean, over ten years, I had tried to start a new life, become a new person. And I wanted to put all that stuff behind me and not think about it. But after you have children, something changes in you and you just want to stand up and do the right thing and protect any other children from having to go through this.

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Q Did you tell your parents how much money you received from your settlement with Jeffrey Epstein?
A No. That is a -- I think there's like a non-disclosure statement. I don't know exactly what the legal term is, but --
Q Did you send any money to your parents?
A No, I don't -- no. No, I've never sent money to my parents.
Q Who is Anthony Valladares?
A One of Tony's shady friends.
Q Did you talk to Anthony Valladares about your involvement with Jeffrey Epstein?
A No.
Q Did you ever live with Anthony Valladares?
A No, he used to come over to my house.
Q Between 2000 and 2002 did you ever have any interactions with law enforcement?
A Yes.
Q When?
A When I tried to break away from Jeffrey and Ghislaine, I started making myself unavailable. And I got a job at Road House Grill. And Tony used to come pick me up in the afternoons, at nighttime, and he'd sit at the bar. And there's this big cup that's got tips in it.

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I was in the back room. And I had to -- first you have to sign out and you have to take off your aprons, put your aprons away. And there's a whole bunch of cleaning up stuff you have to do.

In that time period, Tony grabbed money from a cup that had money in it. That was for the bartenders for their tips. My boss called me the next day. He told me that I had stolen the money, which I hadn't. And I came back and I returned the money after I confronted Tony about it. Gave the money back to him and he said, I'm sorry, but it's just law that I have to call the police. So he called the police.

And knowing that Jeffrey has got the Palm Beach Police Department in his pocket, I went to Jeffrey Epstein and I told him what had happened.

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And Jeffrey said, Don't worry about it. Let me take care of it for you.

Q Okay. I'm sorry. When did you have interaction with law enforcement, then?

A What year?

Q Did you speak with a law enforcement officer?

A I don't believe I spoke to them. Jeffrey handled everything.

Q Okay. And you said that you had finished your shift at -- this is at the Road House Grill, correct?

A Correct.

Q You had finished your shift?

A Yeah, it was the end of the shift.

Q Okay. And you had cleaned up and were checking out, correct?

A Yeah, it's a completely separate part of the -- it's like back of the house. Do you know what that means, like in waitering terms?

Q (Indicating.)

A Yeah, back of the house.

Q And what was -- who was this boss that you spoke to?

A I can't remember his name.

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Q Okay.

A But, I mean, he was very nice. He didn't want to but he just had to because it's just the law. You know, the money was returned to him, but he still had to do what he had to do.

Q You paid him back the money the next day?

A Very next day.

Q And did you ever speak with the Palm Beach County Sheriff's Office about it?

A You know, I don't know if they called me or not, but I know that since my boss told me he had to call the police, I went to Jeffrey. And Jeffrey said he'd handle it.

Q How old were you at the time?

A I don't know, 18, maybe 19.

Q You weren't a juvenile, were you?

A Well, juvenile being under 18, no.

Q Is that the only interaction with law enforcement that you had between 2000 and 2002?

A Correct.

Q Were you, in fact, charged with theft based on that case?

A No charges were ever brought to me.

Q Do you know if they were filed?

A No. Jeffrey told me he'd handle it, and I never heard anything about it ever again.

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Q Did you ever check to see if you had a warrant out?

A No. Jeffrey told me that he took care of it.

Q Do you think it's a problem to leave the country when you have an outstanding warrant?

MR. [redacted]: Object to the form. Foundation. Lack of predicate.

A I don't think I have an outstanding warrant. Why would I -- do you have a document that says I have an outstanding warrant?

Q (BY MS. MENNINGER) I'm just asking you if you believe it's a bad thing to leave the country when you have an outstanding warrant?

A Absolutely.

Q And you would never assist someone in doing that, correct?

A Correct.

Q During the year 2015, have you spoken to law enforcement about any topic other than Ghislaine Maxwell?

A In 2015?

Q Um-hum.

A Did I talk to any law enforcement about Ghislaine Maxwell?

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Q About anything other than Ghislaine Maxwell?

MR. [redacted]: And I would just object at this point in time and instruct the witness not to convey any answers as to who she has or who she has not disclosed until such time as the Court rules on the current outstanding motion.

I know that we have some obligations to fulfill by the 4th. We intend to do that. And I also recognize we may be back to answer some of these questions. But for today, she's not going to answer those questions.

MS. MENNINGER: Well, I'm just going to ask them and --

MR. [redacted]: I understand.

Q (BY MS. MENNINGER) Have you spoken to any law enforcement in Colorado since the beginning of January 2015?

A I can't answer that question right now.

MR. [redacted]: Hold on one second. I may be able to get you an answer to that question. Can I take -- can I just take a quick break, and I think I can answer that particular question for you?

MS. MENNINGER: I'm not asking you to

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answer any questions --
MR. [redacted]
[redacted].
MR. [redacted]
[redacted]. MENNINGER: I appreciate it, but I'm asking the witness to answer these questions.
MR. [redacted]: I know, I'm just trying to help you today.
For today, don't answer the questions.
THE DEPONENT: I don't mind explaining.
MR. [redacted]: I know, but you --
THE DEPONENT: Okay.
MR. [redacted]: I wanted to help.
THE DEPONENT: Okay.

Q (BY MS. MENNINGER) So have you spoken to any law enforcement officers in Colorado since January of 2015 until today?

A I am not answering that question.

Q Have your attorneys spoken to any law enforcement officers in Colorado since the beginning of 2015 until today?

A I'm not answering that question.

Q Have you been living with your husband in Australia since October of 2015?

A Yes.

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[redacted]

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other terms of his probationary period?

A No. He went to everything that he was supposed to go to.

Q Has he paid his fines?

A Yes, as far as I know.

Q Describe for me the contract that you had with the Mail On Sunday?

A Could you be a little bit more specific? Like --

Q Have you had more than one contract with the Mail On Sunday?

A Well, there was one contract for the picture. And that was to pay me 140,000 for the picture. And then two stories were printed after that for the amount of 10,000 each.

Q Is that the only money that you received from the Mail On Sunday?

A Correct.

Q Did you receive any money for syndication of the photograph?

A Isn't that what the 140 was for?

Q I'm asking you.

A Well, I don't really know what syndication means.

Q Did you have a written contract with the

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Mail on Sunday?

A Yes.

Q Where is that contract right now?

A I don't know. I've moved that many times. I -- I lose paperwork wherever I go.

Q Is it possible it's in the boxes in Sydney?

A I don't think I kept it, to be honest.

Q Did you ever refer back to it after you signed it?

A I know I kept it for a short while, but I mean, like I said, I've moved countries twice in the last two years and three different houses. So the paper trail is lost. I don't know where it would be.

Q Did you receive it via e-mail?

A No. I received it -- Sharon Churcher handed it to me by paper.

Q And you signed it?

A I signed it.

Q And then did you make a copy of it?

A No.

Q You never had a copy of it?

A Well, I had my own copy. I'm sure she has hers.

Q Do you recall there being a period of

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exclusivity?
A Yes.
Q What was that period?
A I believe it was like a three-month period or something.
Q Okay. And what other terms of the contract, do you recall?
A I couldn't talk to any other news publication about the story.
Q Anything else?
A Not that I know of.
Q Were you happy when the period was up?
A Well, I mean, at that time I wanted to write about my story. So I guess, yes, I was happy when that period was up.
Q And you were actively writing a book at that time, correct?
A My manuscript. I've never published it.
Q You were writing the manuscript at the time of your period of exclusivity with Sharon Churcher, correct?
A Those three months were just craziness. I think I started after that.
Q You think you started writing the book after the 90 days were up?

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A Yeah.
Q And then you attempted to sell that manuscript, correct?
A I didn't attempt to sell it. I went to other publications, like, what do you call them? People -- I'm trying to think of the name of the word. People who publish books, not like a newspaper or anything. And I inquired about what they thought of my manuscript and if they thought it was, you know, a good story. And, yeah.
Q So you sent the manuscript to these people for the purposes of trying to publish the book, correct?
A Some people, yes.
Q And you were trying to get money from the book publication, correct?
A Well, I wasn't going to sell it to them for free.
Q But you were unsuccessful in finding someone to publish it, correct?
A Well, I was always on the fence with it. I wasn't too sure if I wanted to or didn't want to. I was more seeking judgment based upon these people who have done this plenty and plenty of times.
Still to this day, I mean, I've had people

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who have been interested in it and I still don't know if I want to do it yet. I mean, I think there's a lot more that can go into it, you know.
Q You were actively sending the manuscript to people for purposes of having them reach a deal with you and publish it, correct?
A No deal was ever talked about. What we talked about was the possibility of publishing it, is it publishing-worthy, would I need to get a ghostwriter. You know, this is the first time I've ever written a manuscript so I didn't know what I was doing.
Q Okay. You contacted Jarred Weisfeld, correct?
A Correct.
Q I'm going to mark a document as Defendant's Exhibit 16. It is a composite exhibit.
(Exhibit 16 marked.)
MR. [redacted]: Thank you.
Q (BY MS. MENNINGER) I'm not going to ask you to read every single page of this, but if you look at the first page.
A Um-hum.
Q Can you tell what this is in terms of what type of document?

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A It's an e-mail from me to Jarred.
Q Okay. And there's also e-mails from Jarred to you on the same page, correct?
A Yes.
Q And can you tell -- I just presume that you know that you have turned over documents in this case; is that true?
A Yes.
Q All right. And do you see at the bottom it's got your name and some page numbers in the bottom right-hand corner?
A [redacted] 003529?
Q Right.
A Yes.
Q So you understood that your lawyers sought from you e-mails, for example?
A Yes.
Q And searched your computer, correct?
A Correct.
Q And printed out e-mails, correct?
A Yes.
Q And these look like some of the e-mails?
A Yes.
Q Okay. Do you have any reason to believe that e-mails produced by your lawyers with your name

on the e-mail address line are anything other than your e-mail?

A No, they're my e-mails.

Q Okay. Did anyone else use your e-mail account?

A No.

Q Okay.

A I mean, well, my husband uses it sometimes. My kids use it for games.

Q Okay.

A But that's about it.

Q So if an e-mail is signed XOXO Jenna --

A Yes.

Q -- is that you?

A Correct.

Q All right. And do you believe anyone else in your family was communicating with [redacted]?

A No, no one else.

Q All right. What was the purpose of you communicating with Jarred?

A We were trying to figure out if my book was -- my manuscript was ever published or publishable. And this was at a time where there was a lot of controversy about what's going on around JE.

And when I say JE, I mean Jeffrey Epstein. It was a very scary thing for a lot of publishers to even consider taking it on because Jeffrey is a very powerful person.

Q Did you send your manuscript to Jarred?

A I believe I did.

Q All right. Did you ask Jarred to send it on to other people like Tony?

MR. [redacted]: Object to the form.

A I can't -- I can't recall. I believe I met Tony through Jarred.

Q (BY MS. MENNINGER) Okay. I'm going to ask you to turn -- well, on the first page, the second e-mail says, is Epstein too big for Tony?

Does that refresh your recollection that Jarred and Tony had something to do with one another?

A Yes.

Q Okay. And on the second page in the middle of the page, just to be clear, is that an indication that, Tony definitely does not want the book, XOXO Jenna.

Is that what you wrote?

A Yes.

Q And these first e-mails are in 2000 -- July of 2012, correct?

A Yes.

MR. [redacted]: I object just to the apparent mischaracterization.

MS. MENNINGER: Of 2012?

MR. [redacted]: Being the first e-mails.

MS. MENNINGER: I only meant the first pages of this composite exhibit.

MR. [redacted]

[redacted]. MENNINGER: But I appreciate your clarification.

MR. [redacted]: Okay.

Q (BY MS. MENNINGER) The first e-mails of this composite exhibit are dated July of 2012, correct?

A Correct.

MR. [redacted]: The first page. As opposed to the first in the chronological timeline.

MS. MENNINGER: Yes.

MR. [redacted]: Okay.

Q (BY MS. MENNINGER) If you flip sort of anywhere towards the back, can you also see that you -- there are e-mails between yourself and Jarred in 2011?

A Excuse me. And which page?

Q Really, you can take your pick anywhere

from the back of that exhibit?

A Yeah, yeah, I see what you're talking about.

Q Here. Why don't I direct you to the bottom right is [redacted] 3563. Now, it's going to be a little tricky to find, but it's about eight pages -- I'm sorry, six pages from the back of the composite exhibit.

A Yes.

Q Do you see on that page an e-mail from yourself to Jarred from June 7th of 2011?

A Yes.

Q And in that e-mail you write: Dear Jarred Weisfeld, We spoke on the phone going back a couple months regarding the story I am writing called, The Billionaires Playboy Club.

Right?

A Correct.

Q I am no longer under any contract and would like to ask you to review my synopsis and if you are interested I would love for you to represent me as my literary agent.

Correct?

A Correct.

Q I've included some of the press that has

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covered the ongoing case of Jeffrey Epstein, the world's richest pedophile. And my good friend and journalist Sharon Churcher has a few from her articles that she has written to send to you as well. Correct?

A Correct.

Q I am very serious about getting my book published and believe this story will cover many genres of interest, not only by those following the lengthy case, but it is also a woman's story of glitz, glamour, sorrow, compassion, and true love. I hope you enjoy. Correct?

A Correct.

Q Signed, yourself?

A Yes.

Q So in about June you sent to Jarred Weisfeld a synopsis and were asking him to represent you as your literary agent to sell the book, correct?

A Yes.

Q And you characterized Sharon Churcher as your good friend, correct?

A Well, at that time -- you have to understand, Jarred and Sharon are very close. Sharon is the one who introduced me to Jarred. And that's

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just being nice.

Q Do you disagree that Sharon Churcher was your good friend at that time?

A Well, at that time I did trust her a lot more than what I do now.

Q Why did you change your opinion of Sharon Churcher?

A You know, I -- I just -- I think -- I think talking to some journalists can be very dangerous, especially sometimes how words can get taken out of context. And I'm not saying that she's a bad person. I'm just saying that just, I wouldn't call her up and ask her what she's cooking for dinner tonight or how the family is doing.

Q Did you ever introduce her to your hair stylist?

A No.

Q All right.

A [redacted], actually, yes, I did. She did get a haircut where I was at.

Q All right.

MS. MENNINGER: So if I could have the e-mails with Paulo Silva, please. I'm going to mark these Defendant's Exhibit -- 18 -- 17.

[redacted], I don't know if that's -- is that just

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one? All right.

MR. [redacted]: What are we on now, 17?

MS. MENNINGER: 17.

(Exhibit 17 marked.)

Q (BY MS. MENNINGER) Very similarly, can you take a look at this exhibit? It is a composite of documents produced by your attorneys with various [redacted] ranges, [redacted] numbers in between [redacted] 2750 and 3928.

A 2750 and --

Q I think -- I think the last page is 3927, but it does not contain all of -- I'm sorry, 3928. But it does not contain all of the pages in between, just to let you know.

A Okay. Is there one specific that you want me to look at?

Q No, if you can just take a look at the first page.

A Okay.

Q And tell me if you know who this person is?

A Paulo Silva is somebody who works for the Mail On Sunday. And he was the one in charge of paying me.

Q Paying you for what?

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A The 140 plus the 10 and the 10.

Q Okay. And did he also pay you on an ongoing basis for further sales of the photograph of yourself and Prince Andrew?

A No, it was a set fee of 140 plus the 10 and 10. But they broke it up for some reason. So as you can see here, Thanks for transferring the money. I will let you know when it reaches my bank account but just a little bit confused as I have a previous e-mail with the amount owed at 4100. Is there still an outstanding amount yet to be paid.

So they broke it up into quite a lot of different fractions but it still equaled the 140 plus the 10 and the 10.

Q Okay. If I could ask you to flip back to [redacted] 2758. They're in sequential order, so it should be about eight pages back.

A Yes.

Q All right. Do you see -- do you see that that's an e-mail from Paulo Silva to your e-mail account?

A Yes.

Q On or about March 28th, 2011?

A Yes.

Q All right. And it appears to be his

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introductory e-mail to you. Is that a fair characterization of it?

A It would be hard to say. Like, I'd have to look at the first one. That's June 24th. This is March 28th. I suppose so, if he's introducing himself as Paulo Silva.

Q All right. And in this e-mail he introduces himself by name and tells you that he works for [redacted] Syndication and represents they are the official syndication agency for Daily Mail and Mail On Sunday and that he's been overseeing the syndication of your image, correct?

A Correct.

Q All right. And then he tells you that with regard to your image with Prince Andrew he can confirm that they've been able to sell it frequently over the last couple of weeks. And he listed the names of various news agencies to whom they had sold the image, correct?

A Correct.

Q And then he tells you what the sales were as of last Friday and then what your share of it is, correct?

A Correct.

Q And your share of it was approximately

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half of whatever the sales were, correct?

A Yes, it looks that way.

Q All right. And so then he gave you their general payment terms, correct?

A (Deponent perused document.)
Yes. Yep.

Q And is that syndication deal separate and apart from your deal with the Mail On Sunday to get paid for the stories and a chunk --

A Yes.

Q -- for the image?

A So I will have to correct my previous statement.

Q Okay.

A So I forgot completely about the fact that I received 4,487.50 for -- for the pictures that got sold.

Q And is it possible it was sold some more after this date, for which you received some money, correct?

A I don't believe so. I -- I didn't even remember this one, to be honest. So if there's any others that you can show me, I'd be happy to look at them.

Q Well, I'm just asking you if you remember

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what the terms of your agreement were with this syndication, [redacted] Syndication?

A Well, like you said, it looks like half of --

In regards to your image with Prince Andrew, I can confirm we've been able to sell it quite frequently over the last few weeks. So far we've been able to sell it to the following clients. It lists names.

So far the total sales, as of last Friday, is the number listed there.

Therefore, your share is 4,487.

Q So let me be clear. I guess I'm asking, do -- do you recall what your deal was with [redacted] Syndication?

A No, I do not recall it. I just remember Sharon writing up the contract saying 140 plus the 10 and the 10. I completely forgot about the syndication for $4,000 and 487 cents (sic).

Q Okay. I'm going to ask you to turn back to 2754.

A 2754?

Q Correct.

A Okay.

Q And it's a document with the heading [redacted]

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Syndication Limited. Is that the right page you're on?

A Yes.

Q Dated May 23rd, 2011, correct?

A Yes.

Q All right. And there's some handwriting in the middle of the page towards the bottom.

A Not my handwriting.

Q It's not your handwriting?

A No.

Q Do you know whose it is?

A No.

Q All right.

A I don't even know what it says. Does it say Chai canceled and something mode? I have no idea what it even says.

Q Okay. And it's not your handwriting?

A No.

Q It was produced by your attorneys, correct?

A I'm sorry?

Q It was produced to us by your attorneys, correct?

A Yes. They went through and gave you guys everything you asked for.

Q All right. Since these e-mails come from your e-mail address to and from Paulo Silva, do you have any reason to doubt that they are your e-mails?

A I have no reason to doubt.

Q All right. Do you recall a Sandra [redacted]?

A Yes. She was a possible ghostwriter that I was going to use. Sharon recommended that I got a ghostwriter to be involved. And we nearly settled on some kind of agreement, but I wasn't really happy with the agreement in the end, so I decided not to use her.

Q You weren't happy with the terms of her price, if you will?

A Yes.

Q And so you didn't come to an agreement with her, correct?

A We nearly did, but we in the end did not.

Q All right. If I can show you Defendant's Exhibit -- whew -- 18.

MR. [redacted]: You did kill a tree there.

Q (BY MS. MENNINGER) Take a look at that.

(Exhibit 18 marked.)

THE DEPONENT: So put this one away?

MR. [redacted]: Put these in some sort of order. They don't have to be perfect, but just so

you know what you're looking at.

This is 18?

Q (BY MS. MENNINGER) All right. Again, do you recognize that the e-mail address --

A Is mine.

Q -- is yours and it's from and to Sandra [redacted], correct?

A Correct.

Q And the date is in or around May 25th, June 5th, something like that?

A It's Australian so it's backwards. So it's the 6th of May, 2011.

Q Well, I would have thought that except the bottom e-mail is May 24th, the middle one is May 25th and then the most recent one says 6/5. So I don't -- I don't know. I didn't write the document.

A Yeah.

Q But I'm asking if you believe it was in or around the end of May?

A The only reason I can tell you that is because if you look here, 24/5/11 is the way that we actually do our dates in Australia, whereas in America you would do 5/24/11.

So right here where it's written makes it nice and clear but just to be clear, the dates are

backwards.

Q Right. So if an e-mail is responding to May 25th, is it more or less likely that it was written on June 5th or May 6th?

MR. [redacted]: Object to the form.

A I would say May 6th.

Q (BY MS. MENNINGER) So when responded to a May 25th --

A [redacted], no, you're right. No, I'm sorry, I'm going backwards because it's going up, isn't it? Okay. Yes.

Q All right.

A I'm confused, too.

Q Anyway. In the last e-mail it says: I'm very sad we won't be able to work together as I've been very excited about the project. As you know, I do not sell synopsis or individual chapters, and especially not for those amounts. I'm merely intrigued about where you were getting advice from. Rest assured what we have worked on is confidential. If you change your mind, let me know.

So that was around June 5th?

A 2011.

Q 2011, right?

A Yes.

Q All right. So you had been trying to reach an agreement with Sandra [redacted] prior to June 5th?

A Correct.

Q And were unable to do so?

A Yes.

Q And not that you need to read every page, but is it fair to say that you exchanged some portions of your synopsis with Sandra during the course of your interactions with her?

A Yes. And she rewrote some portion of it as well, which I don't even know, it might be in here. It might not be in here. I don't know what I've kept or not kept.

Q Okay. And did you get advice from Sharon Churcher with respect to the terms upon which you should be looking for the ghostwriting agreement?

A Sharon is the one who introduced me to Sandra. I can't remember who was giving me the advice. It's going back so long ago, you know, I don't want to pinpoint somebody and say it was definitely them if it wasn't.

So, yeah, I'm just not going to comment on that one without knowing.

Q Okay. You probably have e-mails, though,

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do you think, perhaps?
A I haven't seen these e-mails since 2011. So --
Q Okay. I'm going to show you Defendant's Exhibit 19.
(Exhibit 19 marked.)
Q (BY MS. MENNINGER) Who is Marianne Strong?
A She's my literary agent.
Q All right. And can you identify Defendant's Exhibit 19?
A I'm sorry?
Q Can you identify what Defendant's Exhibit 19 is?
A Defendant's Exhibit 19, like the number at the bottom?
Q No, do you know what kind of document this is?
A [redacted], it's an e-mail from me to Marianne Strong.
Q All right. And at roughly what time frame?
A February 20th, 2014.
Q All right. And what were you speaking with Marianne or writing with Marianne Strong about?

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A Can I just read it real quick and I'll tell you?
Q Sure.
(Pause.)
A Sure.
Q Do you remember now the topic upon which you and Marianne Strong were exchanging communication?
A I don't recall talking about Lord Colin [redacted] or the [redacted] of Argyll or Colin. And Lord Colin is Scottish. I don't know who Emily is. But I do understand what she's saying. If I win, then my story would be a much better story to write.
Q And what case was she referring to, if you know?
A I think this was regarding probably the time when I was in -- trying to get involved with the CVRA case.
Q In February of 2014?
A Correct.
Q Okay. And at the bottom of the page there's an e-mail from you to her, correct?
A I haven't read that part yet. Give me one moment.
Q Yeah.

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A Thank you.
So it cuts off after that, does it?
Q Um-hum.
A [redacted], sorry. (Pause.)
Yep, I've read it.
Q All right. Do you remember that e-mail now?
A It's going back a long time ago, but it's definitely my kind of writing.
Q Okay. So in the -- on the bottom of the first page, 3417 --
A Um-hum.
Q -- you represented to Marianne Strong that you had served four years as Jeffrey Epstein's personal and abused sex slave, correct?
A Correct.
Q That is not true, correct?
A Since we have now found out the actual dates, it is not correct.
Q Okay. I want to turn the page, the second page. On the first line, the first full sentence that begins on the first line:
Even though there is over 40 women that were once vulnerable girls that looked like the sweet girl next door but now that they have been taken

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advantage of by this disgusting Wall Street tyrant, most of them have led a very unhealthy lifestyle since having served Jeffrey, such as drug addictions and prostitution and do not hold accreditation to talk.
You wrote that, correct?
A Correct.
Q Who are the 40 women that you are talking about here?
A When I spoke to the FBI, they told me that there were -- and this is maybe just a guesstimate, maybe there was more, maybe there was less that they said. But they had told me that there was a lot of other victims involved in this case. And this is when I believed that after the FBI came to see me that they were willing to reopen the case and do something about it.
Q Okay. So the FBI is the one that told you that there were 40 women?
A It could be less than 40. It could be more than 40. I think I just summed it up to 40.
Q You came up with 40?
A Well, I didn't just come out with 40. I think it was around that number. It could be 46. It could be 39. I'm not too sure to be exact.

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Q All right. But you based it on --
A On my speaking --
Q -- what?
A -- with the FBI.
Q Okay. And --
MR. [redacted]: Just let her finish her question before you answer.
THE DEPONENT: Okay.
MR. [redacted]: I just want the record clear.
Q (BY MS. MENNINGER) Who at the FBI did you speak with?
A I can't think of his name. I spoke to -- [redacted], God, I can't even think of his name right now. I spoke to a male and a female. And I also spoke to [redacted] Villafana about everything that was happening.
Q Is it Jason Richards?
A Jason Richards, yes.
Q Did Jason Richards tell you that the FBI was reopening their case?
A He wanted to reopen the case. And the last conversation that I had with him, I can't remember when it was, he said that he was having trouble doing it from the people above him.
Q Okay. When was that?

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A Like I said, I don't know.
Q Was it like a year ago or two years ago or three years ago?
A I don't remember the last time I talked to him. I think I was in Florida the last time I spoke to him.
Q And was that on the phone or in person?
A On the phone.
Q Hmm?
A On the phone.
Q On the phone. Where was he located, if you know, when you spoke to him?
A I don't know.
Q Do you have his phone number?
A I have his card somewhere. Probably not on me anymore. Like I told you, my paper trail is (indicating).
Q Okay. So in the fourth line you say: Miraculously since I came to light with the truth in speaking out against him in 2011, the FBI have reopened the case. Which as you know, has current proceedings in which I am involved in.
So what current proceeding were you involved in on February 19th, 2014?
A Well, just speaking with the FBI, I was in

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the assumption that the case was being reopened, that they still were investigating.
Q Okay. Did you believe that the FBI had reopened their case in 2011?
A I believe that's when they first started to reinvestigate and reopen it.
Q And then sometime when you were in Florida Jason Richards told you that they were not actually going to continue investigating the case?
A I believe I was in Florida, yes. And he didn't say that -- he just said his hands were tied and up above, I don't know, chain of command, it just -- it didn't look like it was going anywhere. There was no definite no and a definite yes. It was just, right now there's really nothing that we can do.
Q All right. In the third paragraph from the top, you said there's another major paper that has followed the story for a while that has worked with me before and they were asking you for the exclusive story but updated and obviously the end outcome from the judicial decision.
Who was the other major paper that had followed the story for a while and was asking you for an exclusive story?

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A That would -- that, just coming to mind must be the Daily Mail. If I said I've worked with them before, the only other -- the only other, what do you call them, press, that I had worked with was the Daily Mail, so --
Q Okay. But you said you had held out on them because Marianne had told you about her contact with Emily at the New York City Post, right?
A I have held out because you told me about your contact with Emily with the New York Post, and I appreciate you trying to make big headlines for the story and hopefully one day the book. Yes.
Q Okay. And then the last line of that paragraph you say: I would also like to know that I'm going to profit from this as well, correct?
A Correct. I'm not going to give it for free.
Q Right. All right.
(Exhibit 20 marked.)
MS. MENNINGER: Defendant's Exhibit 20.
Q (BY MS. MENNINGER) Do you recognize these documents -- this document, which is another composite exhibit?
A Yes.
Q Do you recognize it?

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A [redacted], like I said, I don't recognize it, but it obviously comes from --

Q Your e-mail address?

A Yes.

Q Now, what e-mail address is that, exactly, on the first page of this exhibit?

A @icloud.com, that must be from a phone.

Q So that's different from the other e-mail address?

A Yeah, I don't actually know about that e-mail address. I obviously used it. It has my husband's name on it, Robert [redacted].

Q And is the e-mail signed by your husband?

A No, it's signed by me.

Q Okay. And in the subject line you wrote [redacted] (Jane Doe 102), correct?

A Subject line?

Q The very top line of that page.

A [redacted], yeah, I see.

Q Okay. And it was to jason.richards2@ic.fbi.gov, correct?

A Correct.

Q And is that Jason Richards we were just referring to?

A Yes.

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Q All right. And you had some e-mails with Jason Richards over time; is that fair?

A Sure.

Q These ones that came from your computer, right?

A Sure, yes.

Q Okay. You talk about having spoken with Judge Paul Cassell in this first page, correct?

A I am here to get this BS non-prosecution agreement thrown out and speaking with Judge Paul Cassal (sic). He suggested trying to get ahold of any photos or video recordings released by the FBI to assist our case further in providing (sic) how much pedophilia occurred by Jeffrey and the many other monsters he obliged with underage girls.

Q Okay.

A If this is a possibility, please let me know so I can give you Brad [redacted] (my attorney) his contact details. Many thanks for your time and I hope we should meet again.

Q Okay. And so you were going back to Jason and trying to get any evidence that the FBI had about your case, right?

A Correct. Any photographs pertaining to what -- myself, not of anyone else.

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Q Right.

A But anything they had of me.

Q And Brad [redacted], who is sitting right here, was your attorney at the time and you identified him as such in the e-mail, correct?

A Correct.

Q You did not identify Mr. -- Judge Cassell as your attorney in this e-mail, correct?

A I knew him as a former judge, and I just wrote down, Judge Paul Cassal (sic) as it looks. But he was my attorney -- I don't know if he was my attorney at that time. But yes -- he's always -- he's been with me since the beginning, so --

Q So he's representing you in this case now, correct?

A Yes.

Q But at that time you don't know if he was your attorney?

A I think he was. I mean, I've been talking with him since the beginning. And this is dated 2014. So I believe at this time he was my attorney at the time as well.

Q Okay. When do you recall first speaking with him?

A Speaking with Paul, I'm not too sure. I

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can't remember if I spoke to Paul in the phone in Australia or if I met him in person in Florida.

Q Do you remember when you signed any kind of fee agreement with him?

MR. [redacted]: Object to the form.

A Um, the -- well, the first time I would have signed an agreement would have been in Florida.

Q (BY MS. MENNINGER) When you were living in Titusville?

A As far as my knowledge reminds me. I mean, I'm looking at e-mails that I can't even remember sending. It's a possibility I could have signed earlier, but as far as I remember.

Q Okay. Do you recall ever having e-mail communications with Sharon Churcher about her publishing the first serial of your book?

A Serial, what does that mean? I'm sorry.

Q Like a sequel.

A A sequel to my book?

Q Um-hum.

A My book has never been published.

Q Right. Do you remember ever e-mailing with Sharon about her being the one who would publish any subsequent follow-up book?

A If you have something in front of you to

see and show me I would look at it. Like I said, there's a million e-mails here. I mean, there's a whole dead tree with e-mails I don't remember sending. So --

Q So you don't remember that e-mail chain, as you sit here?

A Yes.

Q Okay. You have signed contingency fee agreements with Boies, Schiller, correct?

A Yes.

Q You've signed contingency fees with Mr. Cassell, correct?

A Correct.

Q Mr. [redacted] and his firm?

A Correct.

Q Stan Pottinger; is that correct?

A Correct.

Q And pursuant to those fee agreements you understand that you would get a recovery of any money that you won in this case, correct?

A Correct.

Q And what percent is that?

A I don't know off the top of my head. I think it's 40 percent. I'm not too sure, to be honest.

Q Do you remember having any conversations with Rebecca Boylan about money that you hoped to obtain from this case or from any other source related to this?

A I remember talking to Rebecca Boylan as a girlfriend telling her what cases I was involved with. I don't believe we ever spoke about any monetary settlements. There was no number that was ever mentioned. I told her that I was involved in these cases. And, you know, it was just girlfriend talk between girlfriends. I never expected her to turn around and consort with the enemy.

Q Well, it's fair to say you do hope to make money from bringing this lawsuit, correct?

MR. [redacted]: Form.

A I hope to win, but that's not the only reason I want to win. I want to see justice come through.

Q (BY MS. MENNINGER) Is money one of the reasons you want to win?

MR. [redacted]: Same objection.

A More than the money, I want to see Ghislaine and Jeffrey own up to what they have done and pay for the price, yes.

Q (BY MS. MENNINGER) Is money tight in your family?

A We've been doing well.

Q You've been doing well?

A Yes.

Q What is your source of income right now?

A My husband is the main income -- he's the breadwinner and I'm a stay-at-home mom.

Q And what is his job?

A [redacted].

Q And how long has he had that job?

A He got that job, I believe, in December or January. December 2015 or January 2016. I know he got the job and then we had to go through all these preliminary tests and everything to make sure you qualify. So --

Q And what is the last paid employment that you had?

A The last paid employment that I had was -- there was that -- do you remember going back through the e-mails where I had that resume and I sent it and they said, What time do you want to come for an interview?

I ended up getting the job there for two

days because the place was disgusting and the boss was just horrible.

I didn't get paid from them, but I got employed by them. And other than that, the last time I worked was in -- ended in 2006 for ET Australia.

Q Did you quit that job after two days because the place was disgusting?

A It was vile. Okay. They had the -- the whole place was closed down. The restaurant was closed down for a period of, like, six months. And he wanted me to go into this freezer area that had a dead rat in it and like this thick (indicating) layer of mold at the bottom. And he wanted me to clean it.

Q All right.

A And I was just like, No.

Q Just checking, did you quit or did he fire you?

A No, I definitely walked out of that one, hands up.

Q Okay. I'm going to do one more document I have, quickly.

(Exhibit 21 marked.)

Q (BY MS. MENNINGER) I'll show you Defendant's Exhibit 21, another composite exhibit. Do you recognize the to and froms on this e-mail?

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A To Sharon Churcher from myself, yes.
Q And this is the Sharon Churcher from Mail On Sunday we were discussing earlier?
A That's correct.
Q And these are from February of 2011, correct?
A Yes.
Q Okay.
A I mean, it's just assuming that we're not looking at Australian backwards dates.
Q Okay. Well, a few pages back, where it says 2/19/2011.
A [redacted], yeah, yeah.
Q All right. If I could direct your attention to one of the pages, it's 3676 in the lower right-hand corner.
A 3676.
Q Now, these are in sequential order. They're not in [redacted] stamp order so you might have to look at the dates on the top to find one that's February 19th of 2011.
THE DEPONENT: Do you know which page it is?
MR. [redacted]
[redacted]. MENNINGER: It's almost in the middle.

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MR. [redacted]: It's like what she's saying is that --
MS. MENNINGER: If you look at the date at the top --
MR. [redacted]: If you look at the top it says 2/19/2011. That's not it. It's like half a page. Keep going.
A 2/13, 2/17, 2/18, 2/19 -- 2/19/2011.
Q (BY MS. MENNINGER) If it says 3676 in the lower right-hand corner?
A Yes.
Q Okay. Is that an e-mail that you sent to Sharon Churcher in response to an e-mail that Sharon Churcher sent to you?
A To Sharon Churcher from Jenna, Subject R-E, received, yes.
I tried to call the line was busy. Could you call concerning the question you asked?
Q All right. And that was in response to an e-mail just below it you received from Sharon Churcher, correct?
A Yes.
Q And what did Sharon Churcher write to you on February 19th of 2011?
A Do you know a [redacted]?

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Supposedly JE purchased her at age 14 from her family.
Q Okay. And then you asked her to call to discuss that, correct?
A I tried to call. The line was busy. Could you call concerning the question you asked?
Q Right.
A Yes.
Q All right. Defendant's Exhibit 22.
(Exhibit 22 marked.)
THE DEPONENT: Thank you.
Q (BY MS. MENNINGER) Okay. Do you recognize these series of e-mails?
A So far. I mean, it's definitely from me to her. Or actually, Michael [redacted] is the photographer that worked with her, just to be clear.
Q And is she one of the two -- the recipients of the first-page e-mail? You and she received an e-mail from Michael [redacted]; is that right?
A Yes.
Q Okay.
MR. [redacted]: I think she wants you to look and make sure you recognize them.
Q (BY MS. MENNINGER) Yeah, do you recognize

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the document, the e-mails?
A Like I said, these are back in 2011, but it's from my e-mail address. I recognize that. I recognize Sharon's name and I recognize Michael [redacted].
Q Do you have any reason to doubt that the e-mails from March of 2011 --
A I don't have any --
Q -- from yourself and Ms. Churcher are accurately reflected from the documents taken from your computer here?
A I have no reason to doubt that.
Q Okay.
(Exhibit 23 marked.)
Q (BY MS. MENNINGER) Defendant's Exhibit 23. Again, e-mails between your e-mail address and Sharon Churcher from May of 2011. Do you recognize your e-mail address?
A Yes.
Q And Sharon Churcher's e-mail address?
A Yes.
Q And you're signing your e-mails to her, Much love, XOXO Jenna. And she's signing her e-mails to you, Love Shaza, correct?
A Correct.

Q And Shaza is a name that you call her?
A In Australia we kind of shorten the names of people and put z-a on the end, so yes.
Q So she became Shaza?
A She became Shaza, correct.
Q And do you recall having e-mail communications with her in which you referred to her as Shaza and --
A Yes.
Q -- she referred to herself as Shaza?
A She's the same person we're talking about, yes.
Q All right. So it's coming from her e-mail address as Sharon Churcher, right?
A Yes.
Q All right. And I think the last --
MR. [redacted]: Are you at a stopping point?
MS. MENNINGER: Almost.
MR. [redacted]: Okay. Okay. I just have to a make a quick call, but I can wait a while so --
MS. MENNINGER: I understand. Almost done.
MR. [redacted]: Okay.
(Exhibit 24 marked.)
Q (BY MS. MENNINGER) This is Exhibit 24, e-mails between yourself and Sharon Churcher from June of 2011?
A Um-hum. Yes, sorry.
Q And, again, Shaza and Jenna, Shaza, Jenna, Jenna, Shaza, right?
A Yes.
Q And at the bottom of this first page, is Sharon Churcher giving you advice regarding the purchase by Vanity Fair of your picture with Prince Andrew?
A May I have time to read it, please?
Q Please.
A Are we talking about the very bottom one or the one in the kind of middle bottom?
Q The very bottom one.
A I would let VF buy your picture via Brad. The big gamble would be to let him also give them a statement.
Q Right.
A (Deponent perused document, sotto voce.) The reason this is a gamble is Jeffrey knows some of the most powerful people in publishing and, once altered, will inevitably try to scare off potential buyers. But the upside is it should help you get a good agent. I would have Brad use the phrase sex trafficked as that is a heads up about the book revealing more than be printed.
Q All right. So is Sharon Churcher writing to you about -- actually, it's cc'd to Brad, correct?
A Yes.
Q And I only use Brad, not his last name because it's brad@pathtojustice.com, correct?
A Yes.
Q All right. And that's Brad [redacted], who is sitting here, right?
A Yes.
Q All right. And so in the e-mail from Sharon Churcher to you regarding whether or not you should let Vanity Fair buy your picture, she's also recommending in the last line that you should have Brad use the phrase sex trafficked, correct?
A If a statement is made, yes. I don't think Vanity Fair ever did, anyway.
Q And the picture that they're talking about there is the one with Prince Andrew, correct?
A That's -- yeah, the big one.
Q The one that was previously sold?
A Yes.
Q And Paulo Silva was syndicating that one, correct?

A Yes. Yeah.
Q And on that second page there's a redaction. Who is -- who is in that redaction?
A I have no idea.
Q You don't know?
A No, I don't know.
Q So who are the two world's most respected politicians? [redacted] and who?
A I don't know.
Q Do you recall ever telling Sharon Churcher that you were trafficked to two of the world's most respected politicians, [redacted] and somebody else?
MR. [redacted]: Object to form.
A Is that her wording? This is from her. So this is her wording.
Q (BY MS. MENNINGER) Right.
A If she considered them to be the world's most respected politicians, that would be her opinion, not mine.
Q Okay. But you received this e-mail and responded to it, correct?
A Is the top one above that what I responded to? Sorry. It just confuses me because it goes upwards, doesn't it, not downwards. We're not

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reading chronologically down, are we?
Q You can probably look at the dates and figure it out. I need you to do that, not me?
A Okay the 30th of the fifth, 31st of the fifth, 6th of the first. Right. So I still don't know who she's talking about there.
Q You don't know if you received this e-mail?
A No, I received this e-mail, obviously, but I don't know who's redacted there.
Q Okay. And in the e-mail that you responded to, you're talking about -- you used B. Clinton, correct?
A It does concern me what they could want to write about me considering that B. Clinton walked into VF and threatened them not to write sex trafficking articles about his good friend JE.
Q Right. Does that refresh your memory that when you got this e-mail unredacted Bill Clinton was included as well as [redacted]?
MR. [redacted]: Object to the form.
Q (BY MS. MENNINGER) In the line referred to as two of the world's most respected politicians?
A It could be. But, again, I would be making an assumption because I don't know who that

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name is.
Q I don't either.
A Okay.
Q Maybe our lawyers can tell us.
MS. MENNINGER: All right. Last one, and then you can get your break.
(Exhibit 25 marked.)
Q (BY MS. MENNINGER) Defendant's Exhibit 25. Again, e-mails to and from yourself and Sharon Churcher, correct?
A Yes.
Q And in this e-mail, it's dated 4/12/2015 on the first page of this composite e-mail?
A Yes.
Q She is encouraging you to do a book, correct?
A As she has from the beginning, yes.
Q Right. And she suggested a roman a clef. Do you know what that means?
A No.
Q On the third page back, she wrote you to compliment you about David Boies taking your case, correct?
A (Deponent perused document sotto voce.)
Just reading about David Boies taking your

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case. How fantastic, Jenna! Have you asked him how he'd feel about reviving your book? It would be an incredible shame if the other project lifts your story, which it could at least somewhat. Jarred is still very keen to represent you. I'm afraid I screwed you by steering you to Mimi.
I just had a great weekend in LA on a celebrity story. Got to go to Rodeo Drive!!!
Much love, Shaza.
Yes.
Q So she's encouraging you to have David Boies also help you in the book writing department, right?
MR. [redacted]: Object to the form. Mischaracterizes the exhibit.
A Is the question pending?
Q (BY MS. MENNINGER) Yes.
A She -- yeah, she encouraged me to -- I mean, once she saw that, you know, there was more litigation going on, she thought -- like she says, How fantastic. And up until recently she's still been trying to get me to get the book out.
Q And in May of 2015, do you have -- did you have any active agreement to publish your book?
A In May of 2015, no. Jarred wanted to do

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something again, but his only thing was, he wanted Sharon to be in on it as like a ghostwriter. And I said, Look, Sharon is all well and good, but I don't want a journalist, you know, as they can twist things around writing my story.
So he was like, Well, I'm sorry, I don't want to work with you then. And I said, Well, that's fine. No problem.
Q Do you, as you sit here today, have any agreement to publish your story in written form?
A No, we have no agreement.
Q Do you have an agreement for anyone else to write your story?
A No.
Q Have you got any ghostwriter in the book?
A Besides Sandra, who I didn't like, no.
MS. MENNINGER: All right. I think now is a good time for a break. And then --
MR. [redacted]: Okay.
THE VIDEOGRAPHER: We are off the record at 4:12.
(Recess taken from 4:12 p.m. to 4:22 p.m.)
THE VIDEOGRAPHER: We are back on the record at 4:22.
Q (BY MS. MENNINGER) When you were

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e-mailing and speaking with Sharon Churcher in 2011 about the Vanity Fair possibly purchasing your photograph --

A Um-hum.

Q -- do you recall whether you shared with Sharon Churcher anything that you had discussed with your attorney, Mr. [redacted]?

A In relationship to what? Like, have I identified people to her?

Q Right.

A Yes.

Q Okay. So you -- you identified people to her and you then looped back to her about your conversations with Mr. [redacted], correct?

MR. [redacted]: Object to the form.

A I'm sorry, can you rephrase? I don't understand.

Q (BY MS. MENNINGER) All right. So you were e-mailing with her --

A Um-hum.

Q -- getting her advice about whether or not to sell your Prince Andrew picture to Vanity Fair?

A Right.

Q She asked you to run some information by Brad --

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A Yes.

Q -- [redacted]. And you said that you were going to do that?

A Um-hum.

Q And then you spoke to Mr. [redacted], correct?

A I don't know if I spoke to him or if I e-mailed him.

Q Okay. And then did you report back to Sharon Churcher what you had discussed with Mr. [redacted]?

A I'm not too sure. Like I said, going back to the 2011 e-mails, look at this pile here. It's impossible for me to know.

Q So you were having a lot of communications with Sharon Churcher in 2011?

A In 2011, yes.

Q All right. And Mr. [redacted] was your attorney in 2011, correct?

A Yes.

Q And did you ever have Sharon Churcher draft for you e-mail to send to Mr. [redacted]?

A Yes, I believe -- I believe she did.

Q And why did she draft e-mails for you to send to Mr. [redacted]?

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A I believe there was -- and this is just going off my recollection.

Q Um-hum.

A I believe there was a time when she was -- [redacted], God, I can't remember. I really can't remember and don't want to say anything without looking at that exact e-mail. Do you have it to show me?

Q Well, I'm sure it's probably in there but I don't want to take the time to look for it now.

A Okay.

Q So I understand you're just repeating what you recall from your memory.

A Yes.

Q And it may not be accurate because you're not looking at the document. I've got that caveat. What do you recall, just as you're sitting there?

A I know there was e-mails that Sharon sent to me suggesting to say to Brad [redacted], I know that. I don't remember or recall exactly what was in those statements.

Q Okay. And did you send those e-mails to Mr. [redacted], as you recall today?

A I don't know. I'm sorry.

Q And do you know if you went back to Sharon

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Churcher and told her about the conversations or e-mails you had with Mr. [redacted]?

A Some of them, I'm sure, yes.

Q Because you were in fairly regular contact with Sharon Churcher at that time, correct?

A Right, at that time.

Q All right. I want to introduce to you Defendant's Exhibit 26.

(Exhibit 26 marked.)

Q (BY MS. MENNINGER) Have you seen this document before?

A I don't know if I've seen this specific document before, but I've seen something close to it, I think.

Q All right. Do you see the date on the document?

A March 10th, 2011.

Q March 9th?

A I see March 10th, sorry.

Q Hmm.

A London, March 10th, 2011.

MR. [redacted]: Both dates are there.

MS. MENNINGER: I'm sure they are. I'm just not seeing the one that you're seeing.

THE DEPONENT: [redacted], I'm sorry.

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MS. MENNINGER: That's okay.
THE DEPONENT: Yeah. Sorry about that.
MS. MENNINGER: Okay.
MR. [redacted]: One is right on top of the other.
Q (BY MS. MENNINGER) I don't doubt you. I was just looking for it.
A Okay.
Q All right. So after the word London, March 10th, 2011, correct?
A Correct.
Q And above that is a title, Statement on behalf of Ghislaine Maxwell, right?
A Yes.
Q By Devonshires Solicitors, PRNE, correct?
A Correct.
Q And then Wednesday, March 9th, 2011, correct?
A Correct.
Q And you understand that March 9th or March 10th, 2011 is roughly the time your original stories were published in the press --
A Correct.
Q -- internationally, correct?
A Correct.

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Q And this statement issued by Ghislaine Maxwell or issued by Devonshires Solicitors on her behalf denied allegations about her that have appeared recently in the media, correct?
A Correct.
Q It says, These allegations are all entirely false, correct?
Did I read that properly?
A Ghislaine Maxwell denies the various allegations about her -- [redacted], yeah, right -- yeah, right below that. These allegations are entirely false.
Q All right. In 2011, were you aware that Ghislaine Maxwell issued a statement denying the allegations about her that had appeared in the media?
A I'm not too sure what I recall from 2011 about Ghislaine Maxwell denying it. I know that she denied it recently in 2015. I know that for a fact.
Q So you don't know whether she denied it in 2011?
A I can't recall back to 2011, if I do remember that.
Q And you don't know whether she put out a press statement that said these allegations are all entirely false, correct?

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A It doesn't surprise me, but I don't remember reading this. I know that, you know, there was a lot of stories in press going on and a lot of them I decided I just didn't want to read. There was a lot of stuff in there that just, I didn't want to go through.
Q Okay. Were you harmed on March 10th or March 11th, 2011 by the issuance of a statement on behalf of Ghislaine Maxwell?
A I am harmed by Ghislaine Maxwell denying anything that has ever happened between us, whether it's in 2002 or 2011 or 2015. I think that she knows what she did, and she should be held accountable for them. And not only has she hurt me once, but she's hurt me apparently twice and now three times.
Q So on March 11th, 2011, say, how were you harmed by the issuance of this press statement?
A She's denied that she had any involvement in the procuring of me and other young girls.
Q Um-hum.
A And she tries to make herself look like she had no partake in it.
Q Did you suffer any physical symptoms on March 11th, 2011 after this statement was issued, as a consequence of this statement being issued?

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A Not being able to remember reading this in 2011, it's hard to say. But it's the same thing that I'm going through right now. I mean, she's denied it again. And it is painful. It's physically painful. I am taking medication to help me deal with this. And --
Q Okay. I'm just limiting you right now to March of 2011.
MR. [redacted]: I would just ask that she's able to finish her answer, though, please.
MS. MENNINGER: Well, the answer is nonresponsive, so --
MR. [redacted]: In your opinion it's not responsive.
Q (BY MS. MENNINGER) I want you to understand that the question is related to any physical symptoms you suffered in March of 2011 as a consequence of Defendant's Exhibit 26 being issued.
A If I would have seen this in March 10th, 2011, this would have been harmful to me.
Q Okay. Do you recall, as you sit here today, experiencing any physical symptoms as a consequence of Defendant's Exhibit 26 being issued to the press?
MR. [redacted]: Objection. Asked and

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answered. Lacks predicate.
A I have been suffering from Ghislaine Maxwell and Jeffrey Epstein since the summer of 2000. So hearing again in 2011 that she's denied it, of course, it's going to hurt me.
Did I hear about this in 2011? I can't tell you I honestly have.
In 2015 is when I know that she denied it. And again, I haven't stopped suffering from the repercussions that they put me through.
Q (BY MS. MENNINGER) And I'm asking you to separate, if you can, any symptoms that you experienced anew in March of 2015 -- I mean, excuse me, March of 2011, as a consequence of this statement being issued, which I believe you said you don't recall seeing at the time; is that fair?
A But you're asking me now about 2015?
Q Nope. March of 2011. Sorry, I misspoke there.
A You're still on 2011?
Q Yes. Did you start taking any new medications in March of 2011?
Let me ask you that.
A I've been taking medication to control my [redacted] since 2002.

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Q Okay. So did you take any new medications or any additional amounts of medications in March of 2011?
A I have been taking the same medication since 2002.
Q Okay.
A And that's due to [redacted] caused from the pain that I suffered at the hands of Ghislaine Maxwell and Jeffrey Epstein.
Q Did you -- do you recall any neighbors or other moms at the school or anybody in 2011 referencing to you in any way the fact that Ghislaine Maxwell had issued a denial of the allegations about her that had been published in the media in March of 2011?
A No. I didn't speak to any -- I didn't speak to any moms about what I had gone through. I mean, when it came out in the press, I don't think any -- like, Australians don't pay attention to news, number one.
Number two, the first time that my friends contacted me they were shocked. And this was, I believe in -- when the press picked it up again, I think, was 2014/2015. And I got a whole bunch of like Facebook texts from them saying, [redacted], my God, I

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can't believe you've been through this. I never knew. I'm so sorry. You know, that kind of stuff. So they never -- I never spoke to anybody about this except for my husband.
Q All right. So the first time you recall any sort of people in your community referencing things to you is when the press picked up on it in 2014 or 2015?
A Yeah, I think it may be end of 2014, early 2015.
Q All right. And so in March of 2011 you don't recall any neighbors or anybody saying anything to you about this?
A No, I don't recall.
Q Did anyone tell you in March of 2011 about Defendant's Exhibit 26, the statement on behalf of Ghislaine Maxwell?
A No, otherwise I would have been able to recall it.
Q Okay. Do you remember anyone in 2011 ridiculing you because of Defendant's Exhibit 26?
A Well, because nobody knew me as Virginia, everybody knows me as Jenna, no one probably put two and two together. And like I told you, I didn't tell anybody. So there was nobody there to ridicule me in

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2011 over this.
Q Where were you living in 2011 when Shaza came to see you --
A [redacted].
Q Do you recall applying for any job in or around 2011 and someone referencing Defendant's Exhibit 26 and denying you a job?
A I don't -- I don't think I applied for a job in 2011.
Q Okay. Did you go see a doctor and talk to any doctor about Defendant's Exhibit 26?
A Not about this. Not about this paper right here. But I have talked to doctors about my abuse at the hands of Ghislaine and Jeffrey.
Q Have you talked to a doctor about any statements in the press made by Ghislaine Maxwell?
A Recent statements, yes.
Q Which doctor did you speak to about that?
A Her name is Judith Lightfoot.
Q And where is she?
A She's in Australia.
Q Where in Australia?
A She's in Sydney, but we do phone conversations.
Q Have you ever met her in person?

A Yes.
Q When?
A In 2011.
Q All right. And is she affiliated with an office or a hospital or what?
A She's a psychiatrist.
Q All right. Have you seen her in person since 2011?
A No, because I've lived so far away and she's kind of the only person that -- like, I've seen a lot of doctors. And I can honestly tell you -- it's really hard for them to break down the walls and be comfortable enough to talk to them about this stuff. Judith is different. She's somebody that I feel I can trust. She's 76 and she's just a very lovely lady.

And she offers me other ways to deal with my pain and suffering. And I continue to see her over the phone because I can't see her in person.
Q Do you recall ever discussing with her Defendant's Exhibit 26?
A I can't recall ever seeing this exhibit. So --
Q Okay.
(Exhibit 27 marked.)

Q (BY MS. MENNINGER) I'm going to give you Defendant's Exhibit 27.
A Yes.
Q All right. Have you seen this document before?
A Yes.
Q And what do you understand it to be?
A [redacted] sounds like a PR, if I'm not right -- if I'm not wrong. Sent -- or subject is Ghislaine Maxwell. I don't know [redacted].

It says: To whom it may concern, Please find attached credible statement on behalf of Ms. Maxwell.

And then it goes on, to hear about that she is saying: Each time the story is retold it changes with new salacious details about public figures and world leaders and now it is alleged by [redacted] that Alan Dershowitz is involved in having sexual relations with her, which he denies.

[redacted]' claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory. Ghislaine Maxwell's original response to the lies and defamatory claims remains

the same. Maxwell strongly denies -- excuse me. Excuse me -- strongly denies allegations of an unsavory nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.
Q All right. Have you seen this statement before?
A I've seen it recently, yes.
Q All right. What -- have you discussed this statement with Ms. Lightfoot? I don't know if she's a doctor or what.
A Psychiatrist, yeah.
Q Is she an MD?
A I don't know what her levels of credential are. I'm sure she is.
Q Okay. When is the first time that you saw the statement?
A This full statement I have only seen through discovery. The original statement that I saw in the press was, [redacted]' claims are obvious lies and so on, so forth. I don't remember seeing this in the press.
Q Okay. So the part that you remember seeing in the press is [redacted]' claims are

obvious lies?
A Yes.
Q Anything else about this?
A I can't remember what else she printed in the press. It's a very horrible thing for her to do, turn around and call me a liar after everything that she knows she's done. And I didn't expect her to come out and be truthful.

Jeffrey Epstein hasn't even issued a statement.
Q Sorry. I'm sorry if you misunderstood my question.
A Yes.
Q Was there anything else within this statement that you recall seeing in the press besides the line, [redacted]' claims are obvious lies?
A Without saying 100 percent, I think that the original allegations are not new and have been fully responded to be shown to be untrue. I don't know if that's in the press or not, but I've read this before.

So I don't know if I'm confusing this with what I've read out of this or what I've read in the press. The main thing is, I know she called me a liar, and that's what she publicized.

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Q And when you say she called you a liar, that's the [redacted]' claims are obvious lies part?
A Yes.
Q Okay. When is the first time that you saw this whole document?
A I guess when you guys handed it over for discovery.
Q Okay. And who showed it to you?
A It was sent to me by e-mail.
Q Okay. Just through the course of communicating with your attorneys?
A Yes.
Q You've never seen it published?
A Not this whole e-mail, no.
Q All right. Did you -- I'm sorry, did you discuss this publication of what you saw in the press with Judith Lightfoot?
A Yes.
Q All right. And when did you discuss it with her?
A When I got back to Australia, Judith and I started seeing each other again. Before then, I spoke with a doctor in Colorado about this. His name is Dr. Olsen. And it was causing me a lot of distress to have to deal with being called a liar all

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over again, when I know I'm standing up doing the right thing. And the doctor prescribed me [redacted]. And, yeah.
Q Okay. So my question was, when did you discuss it with Judith Lightfoot?
I think I now understand you did that after you returned to Australia in November or so of 2015; is that right?
A I returned to Australia in October, and that's when I picked up talking to her again.
Q All right. And you're saying that at another point in time you talked to another doctor, Dr. Olsen, in Colorado, correct?
A Correct.
Q And when did you meet with Dr. Olsen?
A I don't know the first date that I met with him.
Q Did you meet with him more than once?
A I believe so.
Q And you believe you spoke with him about Ghislaine Maxwell's published statement in the press that [redacted]' claims are obvious lies.
That's what you believe you spoke with Dr. Olsen about?
A I spoke with Dr. Olsen about being called

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a liar from the people that abused me.
Q Okay. Do you recall specifically mentioning to him Ghislaine Maxwell's statement to the press?
A I mentioned a lot of names to him.
Q Okay. What new symptoms did you experience following January 2nd, 2015?
A I think it's one thing to be a victim of sexual abuse and survive it and come out trying to tell the world my story, and then another thing for it to be shut down because these people, Ms. Maxwell and others are calling me liars (sic).
Q And I asked you what symptoms had you experienced --
MR. [redacted]: She's going to finish her answer to this question. You cut her off so many times.
MS. MENNINGER: It has nothing to do with this.
MR. [redacted]: It absolutely does. Because this is a psychological damages claim, and she is trying to explain to you what those damages are.
Q (BY MS. MENNINGER) Okay. What are your symptoms that you experienced since January 2nd, 2015 that are new?

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A Very strong anxiety attacks, bad panic attacks. My throat closes up, I can't breathe. I vomit when I have anxiety attacks. My -- this is personal, but my sex life has suffered. My marriage has suffered. Psychologically, it's just hurt me all over again. I mean, they've hurt me before, and now they've hurt me again by doing this.
And I felt like I was in the process of healing before this came out because I had opened up this wonderful charity called Victims Refuse Silence. And then my aim was to heal by helping other girls get out of the situations that I was in before.
And my lawyers were nice enough to help me. I have this beautiful website where you can click on in any state and you can find a place. I have personally called all of them and they will help you get out of the situation that you're in. They will get you medical help. They will get you legal advice. I think I was in the really good process of healing. And when this came out, it just ruined me all over again.
Q (BY MS. MENNINGER) All right. Tell me all of the damages that you claim occurred to you because of Defendant's Exhibit 27.
A My reputation, my psychological abuse,

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physical ailments. My marriage has suffered, my family life has suffered. I'm constantly battling depression. I feel like I've taken 10 steps forward and 12 steps back since this all happened.

Q Okay. And by since this all happened, do you mean since January 2nd, 2015?

A That's correct.

Q All right. Have you lost any income since January 2nd, 2015 as a consequence of Defendant's Exhibit 27?

A Well, I believe that my charity that was going to go forward and help other victims was going to not only bring in income but also be able to provide women with shelters and food and assistance that I wanted to help them with.

I haven't been able to get a job or work or anything like that. You know, financially, my husband brings home the money for me. But as myself goes, I couldn't work right now with everything going on.

Q How much income were you making prior to December 30th, 2014?

A Well, I've been a stay-at-home mom since 2006.

Q So how much income have you lost as a result of Defendant's Exhibit 27?

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A I could only imagine, you know, being the head of a corporation, a charity, I would be earning a decent wage. It's hard to say how much I would be earning because it is a non for-profit.

But because of these statements telling everybody in the world that I'm a liar, my charity has not been able to take off. And as a consequence of that, I have missed out on the results of not being able to go forward with it.

Q Okay. Have you applied for any job that you've been denied since January 2nd, 2015?

A I haven't been denied a job. I haven't -- I've just -- I thought about applying for jobs, but I mean, the second that you Google my name, people are going to know exactly who I am. And these days, employers Google everything, and it makes me fearful that if I do go apply for a job, which I would like to. I mean, my kids are all at school now. I'd like to get back into the work force.

But I'm afraid if I do, my past is going to stop me from being able to do that. No one wants to hire a sex slave.

Q How has your reputation been harmed by Defendant's Exhibit 27?

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A Well, number one, my charity. I mean, that's -- that was my voice for other people to get help. And I don't think that people want to get help from somebody who's being called a liar in the press, somebody who is claiming to be a victim that isn't. I mean, I wouldn't want to get help from somebody who did that, you know.

And I know when I introduce myself to people these days, I don't introduce myself as Virginia anymore. I introduce myself as another name because I'm afraid that if people read papers or if people Google or find out who I am that they'll think differently of me.

Q What do you introduce yourself as?

A I tell everybody my name is Jenna.

Q In what country or location has your reputation been damaged as a consequence of Defendant's Exhibit 27?

A Considering this is worldwide publication, I would saying England, America, Australia. You know, friends in Australia were seeing my face on national TV. Like I said, I can't remember if it was 2014 or 2015. And I have since not been in contact with those friends. I thanked them for their sympathies, but it's not something I want people to

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know about. You know, especially people close to me.

I mean, I want to go out there and I want to help other victims. But being called a liar and people having to sit there and second guess if I'm telling the truth or not doesn't really give me much incentive to want to make friends.

Q Did anyone in Penrose, Colorado approach you and mention Ghislaine Maxwell's name?

A We have reporters at our door.

Q Did anyone in Penrose, Colorado approach you and mention Ghislaine Maxwell's name?

A What, reporters? Yes, plenty of them.

Q Did anyone who lives in Penrose, Colorado approach you and mention Ghislaine Maxwell's name?

A Have you ever been to Penrose? It's -- it's in the middle of nowhere. So you really -- I didn't have friends in Penrose. There was nobody that I knew there.

Q All right. And which reporters mentioned you and Maxwell's name to you in Penrose, Colorado?

A We have reporters chasing us down the street, in car [redacted], taking my kids to the doctor's, going to the grocery store. You know, asking me all kinds of questions about it. And I didn't talk to any journalists or reporters about it.

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Q And what do you recall any reporter saying to you that included the name Ghislaine Maxwell?
A Asking me -- I don't remember what they asked me, to be honest. There was regarding Ghislaine and Alan Dershowitz and Jeffrey Epstein. I mean, it was an array -- you know how reporters can be when they're hashing at you.
Q Okay. So no one in Penrose, Colorado who lived there mentioned Ghislaine Maxwell by name to you?
A Besides reporters?
Q Right. People who live in Penrose, Colorado.
A Right. I didn't know anyone in Penrose, except for my mom.
Q Okay. Now, in March or April of 2015 did you fly to New York?
A I'm sorry, what date?
Q March or April of 2015, did you fly to New York?
A It's a possibility.
Q Did you stay at the Ritz-Carlton?
A It's definitely a possibility.
Q Were you there with Mr. [redacted] and Mr. Cassell and Sigrid McCawley?

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A I've been to New York quite a few times. So I'd have to refresh my memory. But I have been to New York with Brad [redacted] and Paul Cassell and Sigrid McCawley.
Q Was that after January 2nd, 2015?
A Definitely could be.
Q Did you give an interview to ABC News on camera?
A I did.
Q And that was after January 2nd, 2015?
A I did.
Q Did you give an interview to Good Morning America?
A No.
Q All right. Did you correspond at all with Good Morning America about the publication of your story?
A I can't remember if ABC and Good Morning America wanted to do something together. I can't -- all I know is I was interviewed by one person at ABC. I never was interviewed by anyone from Good Morning America. Maybe they were going to show the same airing in the same show, but powers that be, of course, wouldn't let it go forward.
Q Did you give a lecture to the Human Trafficking Coalition sometime after January 2nd, 2015?

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A I did give -- I did go for a speaking engagement. I don't remember when.
Q Was there any speaking engagement you had booked that was canceled after January 2nd, 2015?
A I can't remember off the top of my head.
Q All right. You founded Victims Refuse Silence in February of 2014, correct?
A It was -- it was a process because, obviously, you have to go through all the bylaws and everything. I think we started it in October of 2014, but it wasn't official until January, I think.
Q Okay. So in the period it was in operations before January 2nd, 2015, had you gotten any -- had you been paid any salary by Victims Refuse Silence?
A No, I hadn't.
Q Had --
A I mean, it was just up and running. So there was no --
Q Had any contributions been made to Victims Refuse Silence before January 2nd, 2015?
A I can't recall. You know, we've only had a few contributions. I don't know what dates they were put in.

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Q Has anyone else called you a liar in the press?
A Yes.
Q Who?
A Alan Dershowitz.
Q Anyone else?
A Ghislaine Maxwell, obviously.
Q Anyone else?
A Not that I know of.
Q Has anyone else publicly denied your allegations?
A From what Ghislaine Maxwell said?
Q Have you seen any press in which another person has denied your allegations?
MR. [redacted]: Objection. Vague.
A I've seen allegations denied by Ms. Maxwell. And I've seen the allegations denied by Alan Dershowitz.
Q (BY MS. MENNINGER) And Alan Dershowitz actually went on TV and called you a serial liar, correct?
A Very correct.
Q You saw that, correct?
A Yes.

Q And that hurt your feelings?
A Badly.
Q Did Buckingham Palace issue a denial of your allegation?
A Yes, that's another one.
Q Did Prince Andrew make a public statement in which he denied your allegations?
MR. [redacted]: Form.
A I think he did.
Q (BY MS. MENNINGER) How do you know which harm you've suffered is attributable to Ghislaine Maxwell's denial versus Alan Dershowitz's denial or Prince Andrew's denial?
A Ghislaine Maxwell brought me into the sex trafficking industry. She's the one who abused me on a regular basis. She's the one that procured me, told me what to do, trained me as a sex slave, abused me physically, abused me mentally.

She's the one who I believe, in my heart of hearts, deserves to come forward and have justice happen to her more than anybody. Being a woman, it's disgusting.

Q So you cannot delineate what harm you have suffered in terms of all of the psychological damage you just disclosed?

A [redacted], of course.
Q -- if that is attributable to Ghislaine Maxwell's statement on January 2nd versus Alan Dershowitz calling you a serial liar on Good Morning America?
A Of course, it all hurts. Okay? I know Alan Dershowitz is lying himself. I know Prince Andrew is lying himself. Of course those hurt. It doesn't feel good to have people who have done something to you deny something that's happened, when I'm actually brave enough to come forward and talk about it.

What hurts me the worst is that Ghislaine Maxwell brought me into this. Not only has she hurt me once, but she's hurt me twice coming forward and saying, This is not true, this is categorically untrue and obvious lies.

That to me is a stick in the mud and that to me is what caused the most harm to me.

Q Okay. And so can you point to any person who has referenced Ghislaine Maxwell's denial in the press or to your face or anywhere?
A Can I point to a person?
Q Can you point to any time that someone has referenced Ghislaine Maxwell's denial to you in any

context?
MR. [redacted]: Object to the form of the question.
A Can I point to a person -- I'm sorry. I don't understand. Can you rephrase it for me --
Q (BY MS. MENNINGER) All right.
A -- so I can understand what you mean?
Q Where you live in Australia now, has anyone referenced the name Ghislaine Maxwell to you?
A After all of the news hits, after the press hits in 2015 and, you know, everyone is calling me a liar, all of my friends in Australia called me and talked to me and said, I can't believe this. I can't believe what you went through.

That was very embarrassing for something that I tried to keep separate from my other life where I would like to help victims. I didn't want the friends of my kids parents knowing about that stuff. You know, and of course they all felt sorry for me. And you know, like I said. I didn't know anybody in Penrose. So there's nobody that could have come up to me and talked to me about it. My mom.

Q This question was about Australia, sorry.
A [redacted], sorry, I thought you were talking

about pointing out people.
Q No.
A Okay, well in Australia, yes, at least a dozen friends.
Q They came up and they mentioned Ghislaine Maxwell's denial to the press to you?
A They couldn't believe what I had been through and, you know, that these were, you know, being denied, and they felt sorry for me. And, you know, it was the whole circumference of things.
Q So the people in Australia that came up to you had sympathy for you and believed you, correct?
A Yes.
Q All right. And when you spoke to Dr. Olsen you recall specifically mentioning Ghislaine Maxwell's press release?
MR. [redacted]: Object to the form.
A Yes, I remember mentioning her, as well as the press release, as well as other press releases. And the abuse that I had occurred (sic) from the hands of Jeffrey and Ghislaine.
Q (BY MS. MENNINGER) Okay. When have you been diagnosed with a mental health condition, first?
A I don't know. I mean, I've been told that I've got [redacted]. You know --

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Q When were you first told that?
A Well, early in -- early in 2003, I believe is the first time that I was suffering from [redacted]. And then my doctor, Judith Lightfoot, has in 2011 [redacted]
And, you know, I've recently seen another doctor who said that I've got the exact same symptoms that Judith Lightfoot mentioned, which is [redacted]
Q Which doctor is that?
A You know, I don't honestly know his name.
Q When did you see this new doctor?
A Um --
MR. [redacted]: Sorry. If you're referring to a doctor that's been sent to you by one of your lawyers --
THE DEPONENT: Yes.
MR. [redacted]: -- at this time, I'm instructing you not to answer.
THE DEPONENT: Okay.
MS. MENNINGER: Wait. What is it? You've seen a doctor and you're not going to answer what doctor you've seen?

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MR. [redacted]: Sure. If it's a consulting witness in this case that has seen her at the direction of an attorney, that has not yet been disclosed per any expert witness disclosure, then I'm instructing her not to answer that question.
If that's what you're referring to. I don't know if that's what you're referring to.
THE DEPONENT: That's what I'm referring to.
Q (BY MS. MENNINGER) All right. So you recall seeing Dr. Lightfoot. You recall seeing Dr. Olsen. And you recall seeing a new unnamed doctor recently.
Anyone else you've seen since January 2nd, 2015?
A Dr. Olsen, Dr. Lightfoot. [redacted], Dr. Donahue.
Q Where is Dr. Donahue located?
A He's in my suburb or he's a suburb next to me in Australia.
Q And is that a psychiatric-type doctor, a medical-type doctor?
A He's medical.
Q And what did you see him for or her for?
A I didn't have anybody to basically -- I

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just got to Australia and Judith Lightfoot was helping me. [redacted]
[redacted] And I told him the reason.
Q And this is since you returned to Australia?
A Correct.
Q And this is the first time you had seen that doctor?
A I've seen that doctor twice now.
Q I'm sorry, what was the name again? I know you already said it, but I just --
A Dr. Donahue.
Q Donahue, all right.
This doctor that you haven't yet disclosed, where did you see that person? In what country?
A United States.
Q And in what state?
A San Francisco.
Q And when did you see that doctor?
A Um, Friday. Last Friday.
Q And how many times have you seen that doctor?
A Once. Well, twice actually. I saw him

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the next day, too.
Q All right. Did you suffer from anxiety before meeting Jeffrey Epstein?
A I was never prescribed anything for anxiety before I met Jeffrey Epstein.
Q That wasn't my question.
A Did I --
Q Were you suffering from anxiety before you met Jeffrey Epstein?
A I think a person who has gone through as much trauma as I have in my life would suffer from quite a few problems. But like I said, I was never prescribed anything until I met Jeffrey Epstein.
Q Did you suffer from panic attacks before meeting Jeffrey Epstein?
A Nowhere near as bad, no.
Q So you did suffer from [redacted]. They just weren't as severe; is that what your testimony is?
A No, what I'm trying to say is I did have [redacted]. I did have [redacted]. I had lived a very hard life prior to meeting Jeffrey Epstein as well.
After meeting Jeffrey Epstein and Ghislaine Maxwell, everything escalated. That's when I started to take Xanax and smoke marijuana to help

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calm the anxiety and everything down.

Q Before you met Jeffrey Epstein, had you used any drugs?

A Sure, yes.

Q Which drugs had you used prior to meeting Jeffrey Epstein?

A I smoked pot. I've taken Ecstasy.

Q Cocaine?

A Yeah, I would have snorted cocaine, um-hum.

Q Did you ever abuse alcohol before meeting Jeffrey Epstein?

A No, I was -- I wasn't even of age to be able to buy it. I mean, if there was alcohol at parties I would have drank it, but I wouldn't say I abused it.

Q Okay. Were there ever occasions upon which you were observed to be drunk by other people, prior to meeting Jeffrey Epstein?

A If you're drinking, the possibility of getting drunk is always there. I don't -- I can't recall exact situation where that was the case, but --

Q Were you diagnosed as a drug addict prior to meeting Jeffrey Epstein?

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A No, I was not diagnosed as a drug addict.

Q Were you sent to live at a rehabilitation facility because of your use of drugs?

A No, that was more of a group home. Yes, it was also a rehab facility, but it wasn't because I was a drug addict. I wasn't coming off of anything.

Q Had you abused drugs prior to meeting Jeffrey Epstein?

A I took drugs. I didn't abuse them, but I took them.

Q Okay.

A Recreationally.

Q How often do you see Dr. Lightfoot?

A Once a week every Monday. I've skipped this week because I've been over here and it's expensive to call back home right now, unless you FaceTime, but --

Q Has Dr. Lightfoot recommended that you see a treating doctor in person?

A No, she's -- she knows my history pretty well. And she's a very wonderful woman and I honestly wouldn't -- Dr. Donahue wants me to go see another psychiatrist in person, but I prefer to stay with Judith because she's someone I can personally relate to.

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Q How much does it cost you every time you talk to Dr. Lightfoot?

A Her normal fee is $200.

Q And how much do you pay?

A She doesn't charge me anything anymore.

Q When did she stop charging you?

A Since I got back to Australia.

Q So before you left for Titusville, Florida, you saw her and you were paying $200 per session?

A Yes.

Q And what has Dr. Lightfoot recommended that you do in order to get better?

A She loves what I'm doing with speaking out. She thinks the more that I speak out about it, the stronger I'll become. She recommends that I write my book, I tell my story. She thinks not only will it help me, but by helping me it'll help others find a way to get out of the situation and to know that there's other girls who have gone through what I've gone through and what they're going through.

She recommends meditation, breathing techniques, focus techniques.

Q Does she prescribe medications for you?

A No, she doesn't. She's a spiritual

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doctor.

Q Is there anything that she's recommended that you do that you're not doing?

A Is there anything that I do that she recommends I don't? Sorry, say that one more time.

Q That's okay. Is there anything that Dr. Lightfoot has recommended that you do that you are not actually doing?

Are you following her advice?

A Yes, I am.

Q Okay. And what has Dr. Donahue recommended that you do?

[redacted]

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[redacted]

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[redacted]

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[redacted]

Q All right.

MS. MENNINGER: I'm going to ask that we take just a brief break and that I can hopefully then come back and just ask a few final follow-up questions, okay?

THE DEPONENT: Okay.

THE VIDEOGRAPHER: We are off the record at 5:16.

(Recess taken from 5:16 p.m. to 5:25 p.m.)

THE VIDEOGRAPHER: We're back on the record at 5:25.

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[redacted]

Q When was it?
A I don't know the exact date.
Q What's your best recollection?
A I don't know. I would have to have dates in front of me. If you've got something that has a date on there, I'm happy to look at it and tell you it's right or wrong.
Q It was a few months ago or many months ago?
A Um, to my best recollection, it was about a year ago.
MS. MENNINGER: I have no further questions for you at this time. As you know, there are some questions that you refused to answer and other questions that your attorney directed you not to answer. So we will take those up with the Court and may see you again.
THE DEPONENT: Okay.
MR. [redacted]: And just as a matter of clarification, I don't believe that there's anything she's refused to answer. There may be things that I've instructed her not to answer because I believe that they were privileged or for whatever reason I instructed her not to answer but she hasn't refused to answer them.

Either way, the record is what it is.
MS. MENNINGER: I was going to say, do you dispute that the court reporter has been taking down what was said this entire time?
MR. [redacted]: I'll read it. She'll read.
MS. MENNINGER: Actually, that's a good question.
Q (BY MS. MENNINGER) Do you have any questions that I've asked you today that you don't feel like you understood?
A No, I don't think that there's questions that you've asked me that I don't think I've understood. But, you know, I really just want to state something for my own piece of mind, if that's okay, if I'm allowed to do that.
Q No, that's not really what this forum is about.
A Okay.
Q There are other forums.
MR. [redacted]: That will only be good for them. There is no reason to say that.
THE DEPONENT: Okay.
MR. [redacted]: You get a chance to talk later.
Do you have an order form? And she'll

read it.
MS. MENNINGER: We're going off the record.
MR. [redacted]: Yeah, that's fine. She'll read.
THE VIDEOGRAPHER: That concludes today's proceedings. We're off the record at 5:28.
(Proceedings concluded at 5:28 p.m.)

* * * * * * *

I, [redacted], do hereby certify that I have read the foregoing transcript and that the same and accompanying amendment sheets, if any, constitute a true and complete record of my testimony.

_____
Signature of Deponent
( ) No Amendments
( ) Amendments Attached

Acknowledged before me this
____ day of _____, 2016.

Notary Public: _____
Address: _____
_____
My commission expires _____
Seal:

KAM

STATE OF COLORADO)
) ss. REPORTER'S CERTIFICATE
COUNTY OF DENVER)

I, Kelly A. Mackereth, do hereby certify that I am a Registered Professional Reporter and Notary Public within the State of Colorado; that previous to the commencement of the examination, the deponent was duly sworn to testify to the truth.

I further certify that this deposition was taken in shorthand by me at the time and place herein set forth, that it was thereafter reduced to typewritten form, and that the foregoing constitutes a true and correct transcript.

I further certify that I am not related to, employed by, nor of counsel for any of the parties or attorneys herein, nor otherwise interested in the result of the within action.

In witness whereof, I have affixed my signature this 11th day of May, 2016.

My commission expires April 21, 2019.

Kelly A. Mackereth, CRR, RPR, CSR
216 - 16th Street, Suite 600
Denver, Colorado 80202

AGREN BLANDO COURT REPORTING & VIDEO, INC.
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May 11, 2016

Sigrid S. McCawley, Esq.
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301-2211

Re: Videotaped Deposition of [redacted]
[redacted] v. Maxwell
Case No. 15-cv-07433-RWS

The aforementioned deposition is ready for reading and signing. Please attend to this matter by following BOTH of the items indicated below:

_____ Call 303-296-0017 and arrange with us to read and sign the deposition in our office.

XXX Have the deponent read your copy and sign the signature page and amendment sheets, if applicable; the signature page is attached.

_____ Read the enclosed copy of the deposition and sign the signature page and amendment sheets, if applicable; the signature page is attached.

XXX WITHIN 30 DAYS OF THE DATE OF THIS LETTER

_____ By _____ due to a trial date of _____

Please be sure the original signature page and amendment sheets, if any, are SIGNED BEFORE A NOTARY PUBLIC and returned to Agren Blando for filing with the original deposition. A copy of these changes should also be forwarded to counsel of record. Thank you.

AGREN BLANDO COURT REPORTING & VIDEO, INC.

cc: All Counsel

AGREN BLANDO COURT REPORTING & VIDEO, INC.
216 - 16th Street, Suite 600
Denver, Colorado 80202
4450 Arapahoe Avenue, Suite 100
Boulder, Colorado 80303

[redacted]
May 3, 2016
[redacted] v. Maxwell
Case No. 15-cv-07433-RWS

The original videotaped deposition was filed with Laura A. Menninger, Esq., on approximately the 11th day of May, 2016.

_____ Signature waived.

_____ Unsigned; signed signature page and amendment sheets, if any, to be filed at trial.

_____ Reading and signing not requested pursuant to C.R.C.P. Rule 30(e).

XXX Unsigned; amendment sheets and/or signature pages should be forwarded to Agren Blando to be filed in the envelope attached to the sealed original.

Thank you.

AGREN BLANDO COURT REPORTING & VIDEO, INC.

cc: All Counsel

- AMENDMENT SHEET -

Videotaped Deposition of [redacted]
May 3, 2016
[redacted] v. Maxwell
Case No. 15-cv-07433-RWS

The deponent wishes to make the following changes in the testimony as originally given:

Page	Line	Should Read	Reason

Signature of Deponent: _____

Acknowledged before me this _____ day of _____, 2016.
Notary's signature _____
(seal)

My commission expires _____.

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