EXHIBIT 46

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS Plaintiff, vs. JPMORGAN CHASE BANK, N.A., Defendant/Third-Party Plaintiff. JPMORGAN CHASE BANK, N.A. Third-Party Plaintiff, vs. JAMES EDWARD STALEY, Third-Party Defendant.	1:22-cv-10904-JSR

SATURDAY, JUNE 10, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER

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Videotaped deposition of James E. Staley, held at the offices of Boies Schiller Flexner, LLC, 55 Hudson Yards, New York, New York, commencing at 9:13 a.m. Eastern, on the above date, before Carrie A. [redacted], Registered Diplomate Reporter and Certified Realtime Reporter.

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QUESTIONS BY MS. LIU:

Q. Mr. Staley, on or about the end of July 2006, after Jeffrey Epstein was indicted on child sex offenses, did you speak with Mr. Dimon about the fact that Mr. Epstein had been indicted?

A. My recollection is yes.

Q. And how soon after the indictment do you recall speaking to Mr. Dimon?

A. I don't recall.

Q. And what was the context in which you would have spoken to Mr. Dimon about Jeffrey Epstein's indictment?

A. I don't recall the exact conversation.

Q. And to the extent this was July of 2006, at that time you were the head of asset and wealth management and you reported directly to Mr. Dimon, correct?

A. That's correct.

Q. Do you recall if you were bringing this information to his attention because he was your boss?

A. Yes.

Q. Do you recall if there was anyone else present during your conversation with Mr. Dimon?

A. No.

Q. Do you recall where the conversation took place?

A. No.

Q. Where was your office at that time in 2006?

A. It was in one of two buildings. There was a building across the street from the bank headquarters, and then there was another building that was about four blocks away. I'm not sure which building I was in at that time.

Q. And do you recall if you sat in the same building as Mr. Dimon at that time?

A. In 2006?

Q. Yes.

A. I don't believe so.

Q. Do you recall if the conversation took place in person or by phone?

A. My recollection is it was by phone.

Q. And what, if anything, do you recall about that conversation?

A. Just to let Jamie know that a client of the bank had been indicted.

Q. And do you recall if at that time when you were letting Jamie Dimon know that Jeffrey Epstein had been indicted, if Mr. Dimon already knew who Jeffrey Epstein was?

A. I don't recall.

Q. Why was it that you would have raised this information with Mr. Dimon following Mr. Epstein's indictment?

A. Epstein was a client of the bank. It was a -- and the indictment was a very public event.

Q. Do you recall if at the time you raised Jeffrey Epstein's indictment with Mr. Dimon that he had already heard about it in the news?

A. I don't recall.

Q. And do you recall anything about Mr. Dimon's response to your sharing the information about Jeffrey Epstein's indictment?

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wealth management, she had conversations with Mr. Dimon about Jeffrey Epstein?

A. I would imagine so.

MR. GAIL: Objection.

QUESTIONS BY MS. LIU:

Q. Okay. You would imagine so, but you're not aware of any actual conversation; is that fair?

A. That's fair.

Q. So your testimony is that given her role as the head of asset and wealth management, you would have expected, as you had done, that she would have reported or talked to Mr. Dimon about the problems with Mr. Epstein; is that fair?

A. That's what I would expect, yes.

Q. Is it the case that Sandy Warner had interactions with Mr. Epstein?

A. I believe so.

Q. And tell me about that.

MR. GAIL: Objection.

THE WITNESS: Sandy Warner was the individual who asked that I meet with Epstein, and my recollection, it

was following a meeting that Sandy Warner had with Jeffrey Epstein.

QUESTIONS BY MS. LIU:

Q. And was that in or about the 2000 time period?

A. Yes.

Q. And that -- and during that time period, Mr. Warner was the CEO of JPMorgan, correct?

A. That's correct.

Q. And you knew Mr. Warner because you worked at JPMorgan; is that fair?

A. That's correct.

Q. And tell me what you recall about Mr. Warner asking you to meet with Jeffrey Epstein.

A. Sandy Warner had met with Epstein, he said, and recently he also had made me head of the private bank.

And Sandy said, you should meet Epstein. He's one of the most connected people I know of in New York.

Q. And you did meet with Mr. Epstein at that time?

A. Yes.

Q. And do you recall if you ever reported back to Mr. Warner, I met with Mr. Epstein?

A. I would imagine I did, yes.

Q. And Mr. Epstein became a client of the private bank at the time?

A. No, he was a client already. He was a client before I met him.

Q. And who had the direct client relationship with Jeffrey Epstein at the time you met him?

A. I don't know.

Q. Did you ultimately take over the client relationship with Mr. Epstein on or about that 2000 time period?

A. No, I did not.

Q. What was your professional relationship vis-à-vis Mr. Epstein as a client of the bank at that time?

A. He was covered by a banking team that -- I didn't know who that was. My knowledge of Epstein came through Sandy Warner, and I got to know him, but I was not his banker.

Q. But you were the head of the

Do you see that?

A. Yes.

Q. Okay. And GIO stands for global investment opportunities, correct?

A. I don't know.

Q. But it was part of the private bank, correct?

A. It appears so.

(Staley Exhibit 5 marked for identification.)

QUESTIONS BY MS. LIU:

Q. Okay. You can put that document away.

Okay. So you'll recall we looked at the 2003 document showing his revenues at the top at 8.1-plus million dollars.

You recall that, correct?

A. Yes.

Q. Okay. I'm showing you now what has been marked as Exhibit 5.

So now you'll see we're into about a year later, February 24, 2005. You, Jes Staley, send an e-mail to somebody named Olivier de Givenchy at JPMorgan.

Do you see that?

A. Yes.

Q. And you say, "Ghislaine is a good friend of one of our very big clients in the US. Can we please try to help her?"

Do you see that?

A. Yes, I do.

Q. Okay. And "one of our very big clients" in the context of this e-mail in early 2005 is referring to Jeffrey Epstein, correct?

A. Correct.

Q. You can put that document away.

So leading up to Jeffrey Epstein's indictment in 2006, it's fair to say that he was one of JPMorgan's very big clients; is that fair?

A. That's fair.

Q. Earlier you testified that Jeffrey Epstein referred a number of clients to JPMorgan over the years.

Is that correct?

A. That's correct.

MR. GAIL: Objection.

QUESTIONS BY MS. LIU:

Q. And among these clients are Sergey Brin?

A. Yes.

Q. Google LLC?

A. Yes.

Q. Sultan Ahmed bin Sulayem?

A. Yes.

Q. Ehud Barak?

A. I don't know if Ehud became a client.

Q. Peter Mandelson?

A. Also don't know if Peter became a client.

Q. Mort Zuckerman?

A. Yes.

Q. [redacted]

A. I believe so.

Q. Highbridge Capital Management which we discussed?

A. Again, as I said before, I'm not sure whether Epstein introduced Highbridge or -- as -- or not.

Q. Glenn [redacted]?

A. Same answer.

Q. Kathryn Ruemmler?
A. Yeah, I don't know.
Q. Bill Gates?
A. Yes.
Q. [redacted] Black?
A. Same as Glenn. I don't know how I first met [redacted].
Q. David Gergen?
A. That's correct.
Q. Boris Nikolic?
A. Yes.
Q. Larry Summers?
A. Yes.
Q. Nathan Myhrvold with Microsoft?
A. Yeah, I know Nathan. I don't know -- same answer. I don't know whether Epstein introduced Nathan or not.
Q. Kimbal Musk?
A. I didn't know Kimbal Musk.
Q. Elon Musk?
A. Yes.
Q. Les Wexner?
A. No.
Q. Because Les Wexner, as you described, was working with JPMorgan to take

The Limited public?

A. That's correct.

Q. [redacted] Mitchell?

A. I don't know.

Q. Bill [redacted]?

A. Yes.

Q. Okay. And you suggested on Ehud Barak you weren't sure whether or not he became a client of JPMorgan's; is that fair?

A. That's fair.

Q. Okay. But Jeffrey Epstein did set up various meetings between employees of the bank and Ehud Barak; is that correct?

A. I met Ehud Barak. I don't know if he set up meetings with other people from [redacted].

Q. Are you aware whether or not Mr. Dimon also met with Ehud Barak?

MR. GAIL: Objection.

THE WITNESS: I don't recall.

QUESTIONS BY MS. LIU:

Q. To the extent Mr. Dimon met with Mr. Barak, would that have been a meeting that would have been facilitated by Mr. Epstein?

MR. GAIL: Triple objection.

QUESTIONS BY MS. LIU:

Q. You can answer, sir.

A. Ask the question again?

Q. To the extent Mr. Dimon met with Ehud Barak, would that have been a meeting facilitated by Jeffrey Epstein?

MR. GAIL: Objection.

THE WITNESS: That's -- I don't know.

QUESTIONS BY MS. LIU:

Q. Do you know if Mr. Dimon had any independent connection to Ehud Barak?

A. I don't know.

Q. I think with respect to Peter Mandelson, you also suggested you don't know if he became a client of the bank; is that correct?

A. That's correct.

Q. But did Mr. Epstein facilitate meetings with persons at the bank, including yourself and Mr. Mandelson?

A. He facilitated meetings between myself and Peter Mandelson, yes.

Q. And do you know if Mr. Dimon

ever met or -- I'll rephrase.

Do you know if Mr. Dimon ever met with Mr. Mandelson?

A. I don't know.

Q. And to the extent you met with Ehud Barak, that meeting was arranged by -- or those meetings were arranged by Jeffrey Epstein; is that fair?

A. That's fair.

Q. Do you recall Mr. Epstein arranging a meeting between you and the Sultan of Dubai in early 2006?

A. I don't recall.

Q. Do you recall meeting with the Sultan of Dubai?

A. Yes.

Q. And do you recall meeting with the Sultan of Dubai while you were the head of asset and wealth management at JPMorgan?

A. Yes.

Q. And to the extent -- I'll rephrase.

You met with Mr. Dubai {sic} as part of your position as the head of asset and wealth management at JPMorgan, correct?

A. Dubai is a country, not his name.

Q. And I apologize. I'm looking at a document.

But "the Sultan" we're referring to, Ahmed bin Sulayem, right?

A. Yes.

Q. And you recall that the meeting that Mr. Epstein arranged for you with Sultan Ahmed bin Sulayem was taken by you as part of your role as the head of asset and wealth management at JPMorgan?

A. Yes.

Q. And is it fair to say that your meeting with Ehud Barak, or your meetings with Ehud Barak, were also taken by you as part of your role as an executive at JPMorgan?

A. Yes.

Q. And same question for Bill Gates. You met with Bill Gates on various occasions, correct?

A. Yes.

Q. And again, is it fair to say that your meetings with Bill Gates, arranged

by Jeffrey Epstein, were taken by you as part of your role as the head of asset and wealth management at JPMorgan?

A. Yes.

Q. You also met with Larry Summers, correct?

A. Correct.

Q. And to the extent those meetings were arranged by Jeffrey Epstein, were those meetings taken by you as part of your role as the head of asset and wealth management at JPMorgan?

A. Yes.

VIDEOGRAPHER: Mimi, can we pause one moment?

MS. LIU: Sure.

VIDEOGRAPHER: We have a random phone number that wants to enter into the Zoom.

MS. LIU: Can we go off the record?

VIDEOGRAPHER: Stand by. 11:07. We are off the video record.

(Off the record at 11:07 a.m.)

VIDEOGRAPHER: 11:09, we are on

the video record.

(Staley Exhibit 6 marked for identification.)

QUESTIONS BY MS. LIU:

Q. Mr. Staley, you're being handed what has been marked as Exhibit 6.

You'll see there's an e-mail from Jeffrey Epstein dated May 5, 2014, to you, Jes Staley.

Do you see that?

A. Yes.

Q. Okay. And he's forwarding a message from Sultan bin Sulayem dated May 5, 2014.

Do you see that?

A. Yes.

Q. And if you could turn to the next two pages, you see that there are two photographs there of Jamie Dimon and Sultan bin Sulayem?

A. Yes.

Q. Do you know if Jeffrey Epstein was the one who would have facilitated any later meeting between Mr. Dimon and Mr. Sulayem?

A. I don't know.

Q. And what is DP World? Do you know?

A. I believe it is Dubai Port.

Q. And that's a conference, DP World?

A. I think DP, Dubai Ports, is a part of the Dubai government. I don't know what -- whether it's a conference or whether it's their building.

Q. During your time period working at JPMorgan, are you aware whether or not Mr. Dimon had interest in meeting with the Sultan bin Sulayem?

A. No, I'm not aware.

Q. Let me ask you about a few other names that I didn't see in the discovery responses that you provided in this case.

Michael Ovitz, was that a client referred to by -- referred to the bank by Jeffrey Epstein?

A. I don't believe Ovitz was referred by Epstein, no.

Q. But Ovitz had some connection

to Jeffrey Epstein; is that fair?

A. I don't know what sort of connection Ovitz had with Epstein.

Q. What about Andrew Farkas?

A. I believe so.

Q. But he was a referral with Jeffrey Epstein's to the bank?

A. I believe -- or -- I don't know.

Q. Prince Andrew?

A. I don't -- I'm not sure if Prince Andrew became a client of the bank.

Q. But Jeffrey Epstein at least facilitated meetings between persons working at the bank and Prince Andrew; is that fair?

A. Yes.

Q. Do you recall in or about 2012 or 2013 that Mr. Dimon was invited to a dinner at Buckingham Palace hosted by Prince Andrew?

A. I am not aware of that.

Q. Do you know during your time period working at JPMorgan whether Mr. Dimon had any separate or independent relationship with Prince Andrew apart from the one that

Jeffrey Epstein brought to the bank?

A. I don't know.

MR. GAIL: Objection. That assumes facts not in evidence. That is outrageous.

QUESTIONS BY MS. LIU:

Q. You can answer the question.

A. Can you ask the question again?

Q. Yes.

Do you know during your time period working at JPMorgan whether Mr. Dimon had any separate or independent relationship with Prince Andrew apart from the one that Jeffrey Epstein brought to the bank?

MR. GAIL: Objection.

There's no evidence that there was a separate relationship, and you're baking it into your question. Just ask whether he had a relationship with him.

QUESTIONS BY MS. LIU:

Q. You can answer the question.

A. So ask again?

Q. Do you know during your time period working at JPMorgan, sir, whether

Mr. Dimon had any independent relationship with Prince Andrew?

MR. GAIL: Objection.

THE WITNESS: I don't know.

QUESTIONS BY MS. LIU:

Q. You're not aware of one; is that fair?

MR. GAIL: Objection.

Not aware of any relationship.

THE WITNESS: Yeah, I'm not aware. I was not aware.

QUESTIONS BY MS. LIU:

Q. Mr. Staley, you're not represented by counsel for JPMorgan in this deposition, are you?

A. No.

MR. [redacted]: I'll let him know if that occurs.

MR. GAIL: We don't profess otherwise.

QUESTIONS BY MS. LIU:

Q. Mr. Staley, do you recall at various times Mr. Epstein promoting Mr. Dimon to head up the Treasury Department?

A. No, I'm not aware of that.

on this."

Do you see that?

A. Yes.

Q. And then Todd writes, "Did Ace go to him for an exception to the felon policy?"

Do you see that?

A. Yes.

Q. Do you have any understanding from your time at the bank what an exception to the felon policy meant?

A. No, not specifically here.

Q. And are you familiar with any conversations between Ace Greenberg and Steve Cutler or anybody about keeping Jeffrey Epstein as a client at the bank in this time period?

A. I was not part of these conversations.

Q. Was Ace Greenberg at this time a fairly important person at JPMorgan? Did he have any heft?

A. He was -- yeah, Ace Greenberg was important.

Q. Okay. You can put that

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of your meeting or relationship with Darling?

A. Not that I know of, no.

Q. Okay.

A. Or not that I recall, no.

Q. Okay. If we go down one more, January 25, 2010, this is another e-mail, Epstein to Staley. "The more time you have to announce, the better. I have set you up and Peter to meet in Davos with Darling."

This is a reference to Peter Mandelson?

A. I believe so.

Q. Do you remember meeting with Peter Mandelson in Davos? At Davos?

A. Yes.

Q. And how many times did you ultimately meet with Peter Mandelson?

A. I don't -- just a handful.

Q. If we go down to the last bullet point on that page, it's talking about an individual named [redacted] -- Tom Pritzker.

Do you know who that is?

A. Yes.

Q. Is that somebody who was -- who Jeffrey Epstein introduced you to?

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A. I believe so.
Q. And did Tom Pritzker ever become a client of JPMorgan?
A. I believe he did.
Q. When Jeffrey Epstein made these connections, in this instance, such as the one with Tom Pritzker, was Jeffrey Epstein ever paid as a consultant, an advisor, or any other way for making that connection?
A. Not that I'm aware of, no.
Q. As you sit here now, do you understand why it was that Jeffrey Epstein would go through the effort of making the connection for you with somebody like Tom Pritzker?
A. Again, I think he valued his network of contacts, and introducing me to Tom, vice versa, enhanced that network for him.
Q. A connection such as Tom Pritzker was valuable to JPMorgan, right?
A. True. Yes.
Q. And a -- and that connection was then likely valuable for Tom Pritzker, right?

A. No.
Q. Did you understand him to have a massage room at his home?
A. Yes.
Q. Were you given a tour of his home where you saw the massage room?
A. A tour of the whole house. His main living room was on the second floor, and I think that's where the room was.
Q. So did he show you the massage room?
A. I don't know whether he -- I just -- whether I just saw it in passing.
Q. Did you take the elevator up to the massage room?
A. No.
Q. The stairs?
A. Yes.
Q. Okay.
A. Well, not to the massage room. I took the stairs up to the second floor.
Q. Were there other individuals that you remember by name having met at Jeffrey Epstein's townhouse?
A. Ask it again?

Q. Were there other individuals, asides -- beside Jeffrey Epstein, that you met at Jeffrey Epstein's townhouse that you remember by name?

A. Yes.

Q. Who?

A. Bill Gates.

Q. Okay.

A. [redacted] Black. Katie Couric. Eva [redacted]. [redacted]

Q. [redacted]

A. Yeah, I believe so.

Q. Okay.

A. Larry and Sergey Brin. The Sultan.

Those would be, you know, off the top of my head.

Q. Okay. Switching to a different class of people. Did you meet any of Jeffrey Epstein's staff or friends or any of the females that were at his house?

A. Yes.

Q. And who?

A. Lesley Groff.

Q. What did you understand Lesley

Groff's position to be?

A. His secretary.

Q. Okay. Most of the scheduling of the meetings and things of that nature went through Lesley, the same way you went through Rosa?

A. Right.

Q. Okay.

A. Eva [redacted].

Q. What did you understand her relationship to be as it related to Jeffrey Epstein, aside from being Glenn [redacted] wife?

A. They dated for about ten years, is my understanding.

Q. A long time in the past, right?

A. Yes.

[redacted]

Q. What did you understand [redacted]'s role to be?

A. She was one of his assistants.

Q. Okay. How many times do you remember meeting [redacted]?

A. A number of times.

Q. Okay. Anybody else?

A. He had a couple that took care

of the house. I don't remember their names.

Q. Jo Jo Fontanella?

A. I don't remember their names.

Q. Okay.

A. Off the top of my head, those are --

Q. Did you meet [redacted]?

A. Yes. Sorry.

Q. And in what context did you meet [redacted]?

A. She was also one of his assistants.

Q. And what did you think that her role was?

A. You know, he had a lot of properties. He traveled around. He had assistants that helped him with all that.

Q. What did you understand Jeffrey Epstein's business to be on a day-to-day basis?

A. My understanding was -- well, he managed his network. My understanding, you know, he didn't have a business, per se; that his wealth was accumulated from his relationship with Les Wexner.

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SUNDAY, JUNE 11, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

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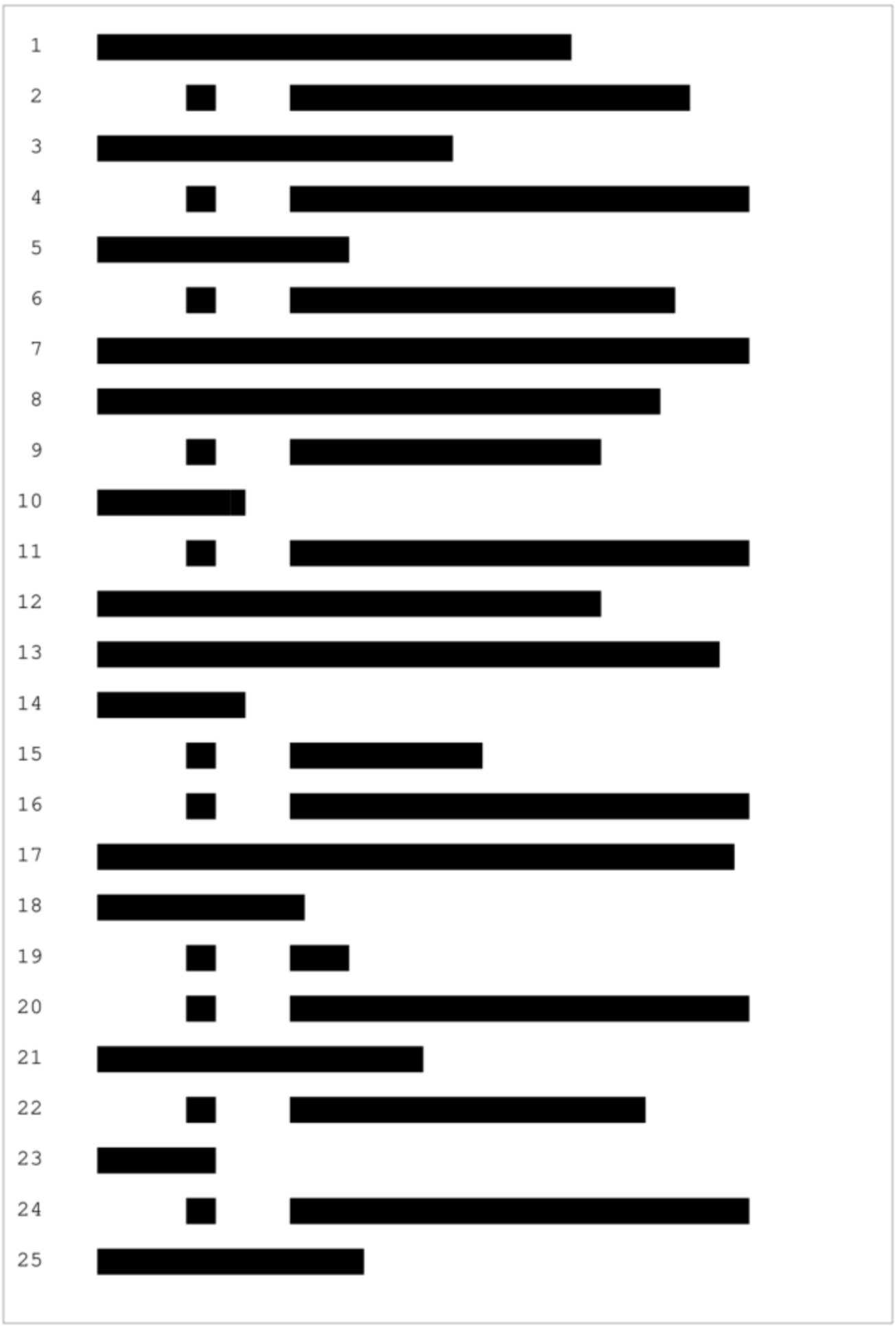
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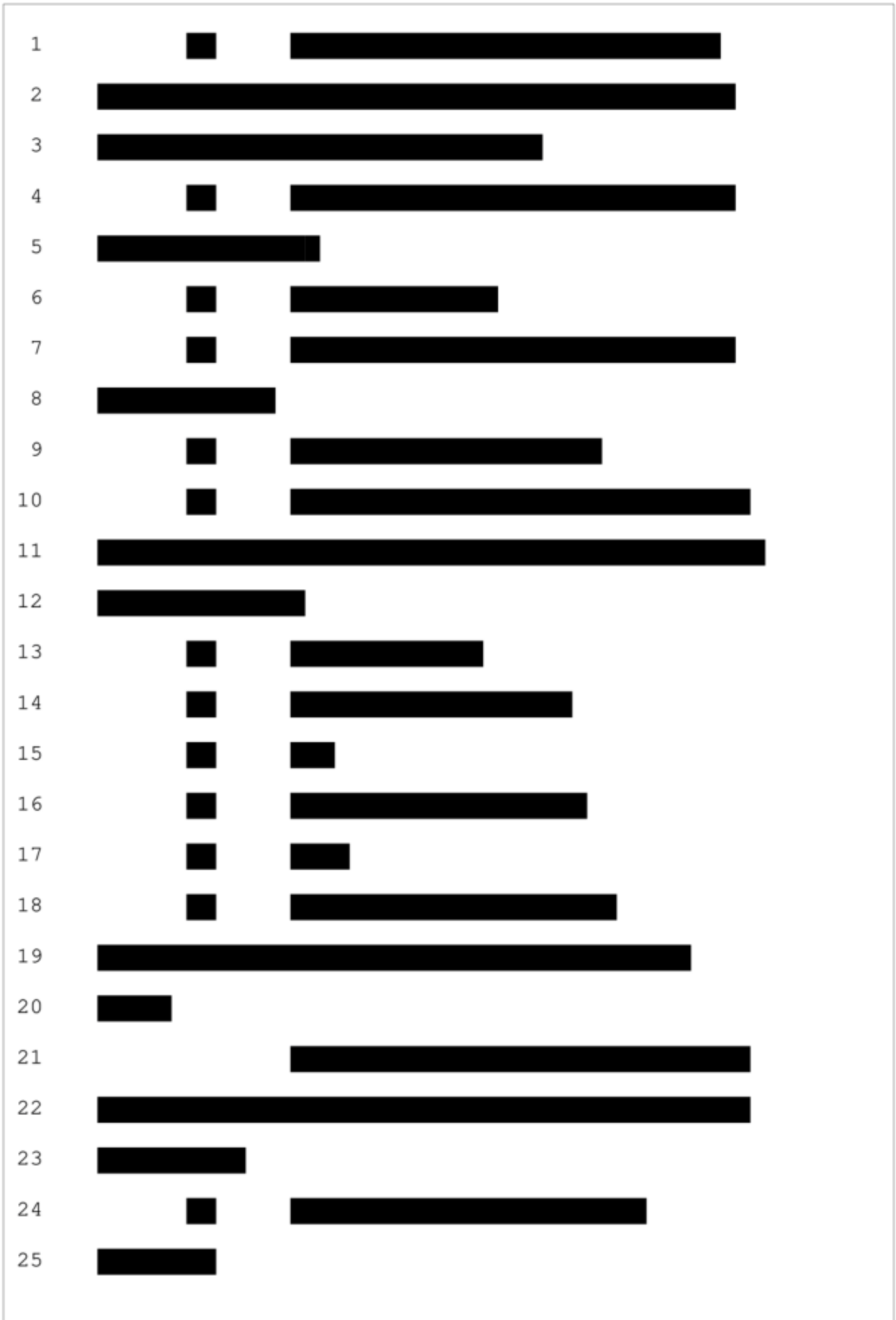
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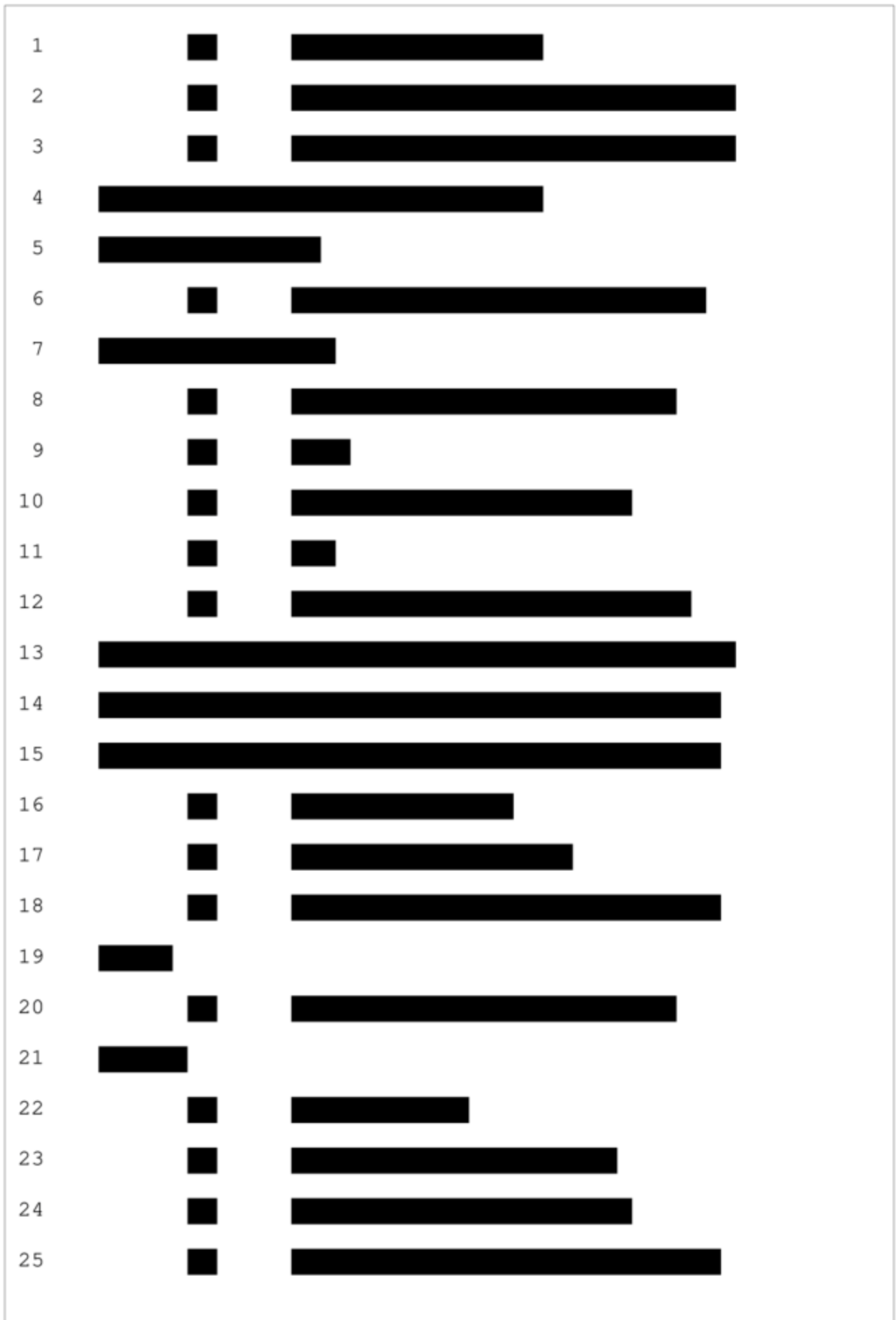
Q. If I asked you the question --

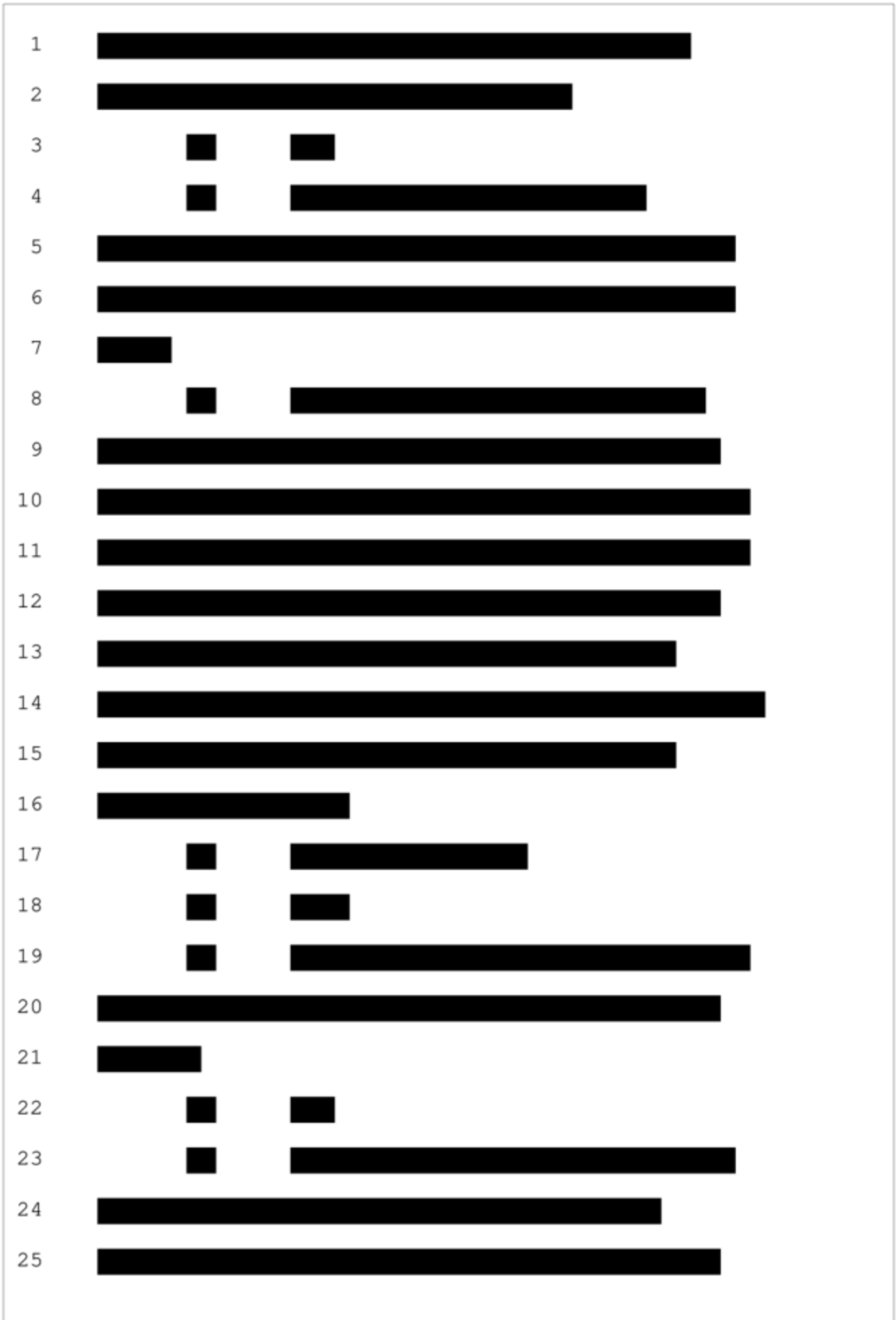
A. I don't recall how many times.

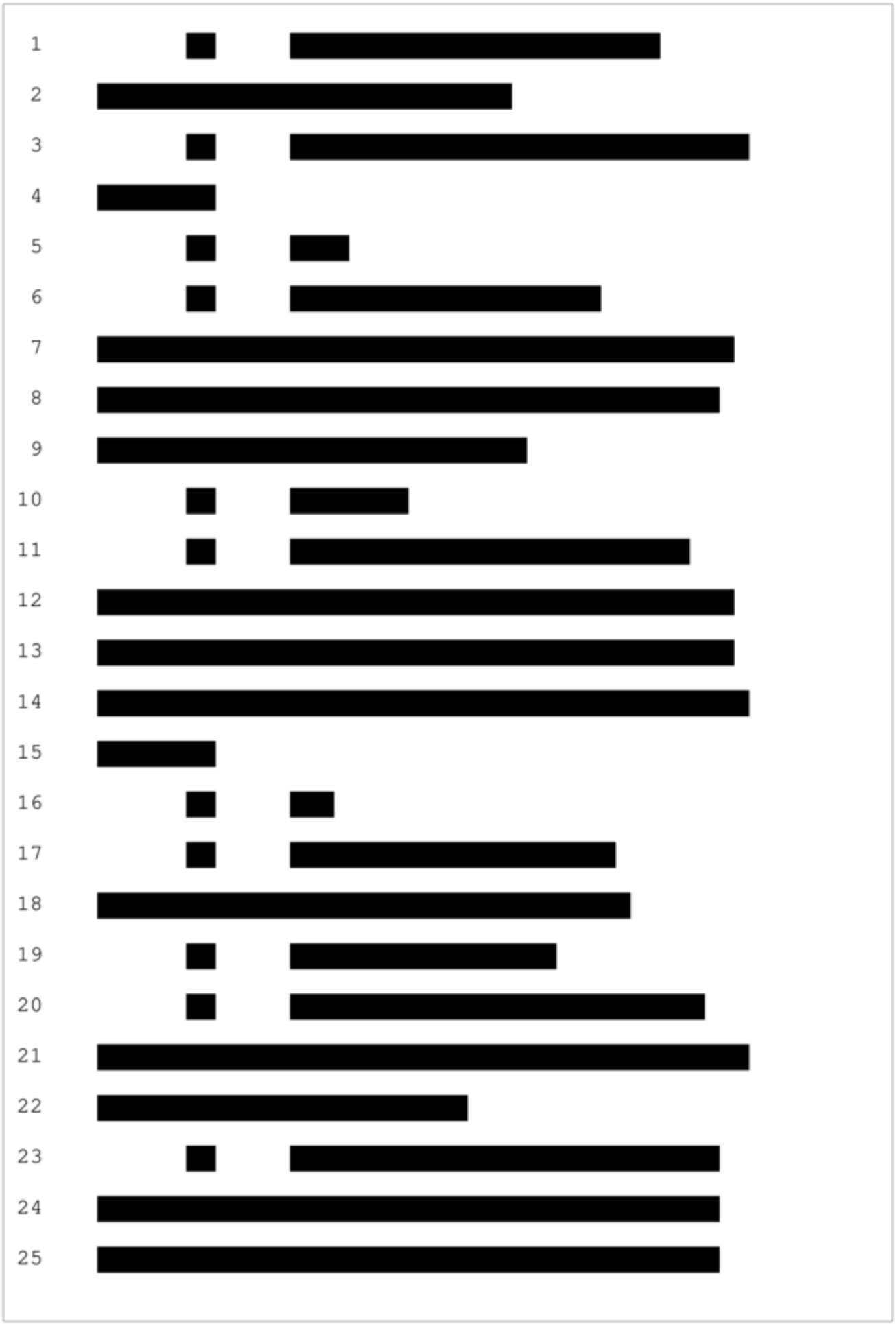
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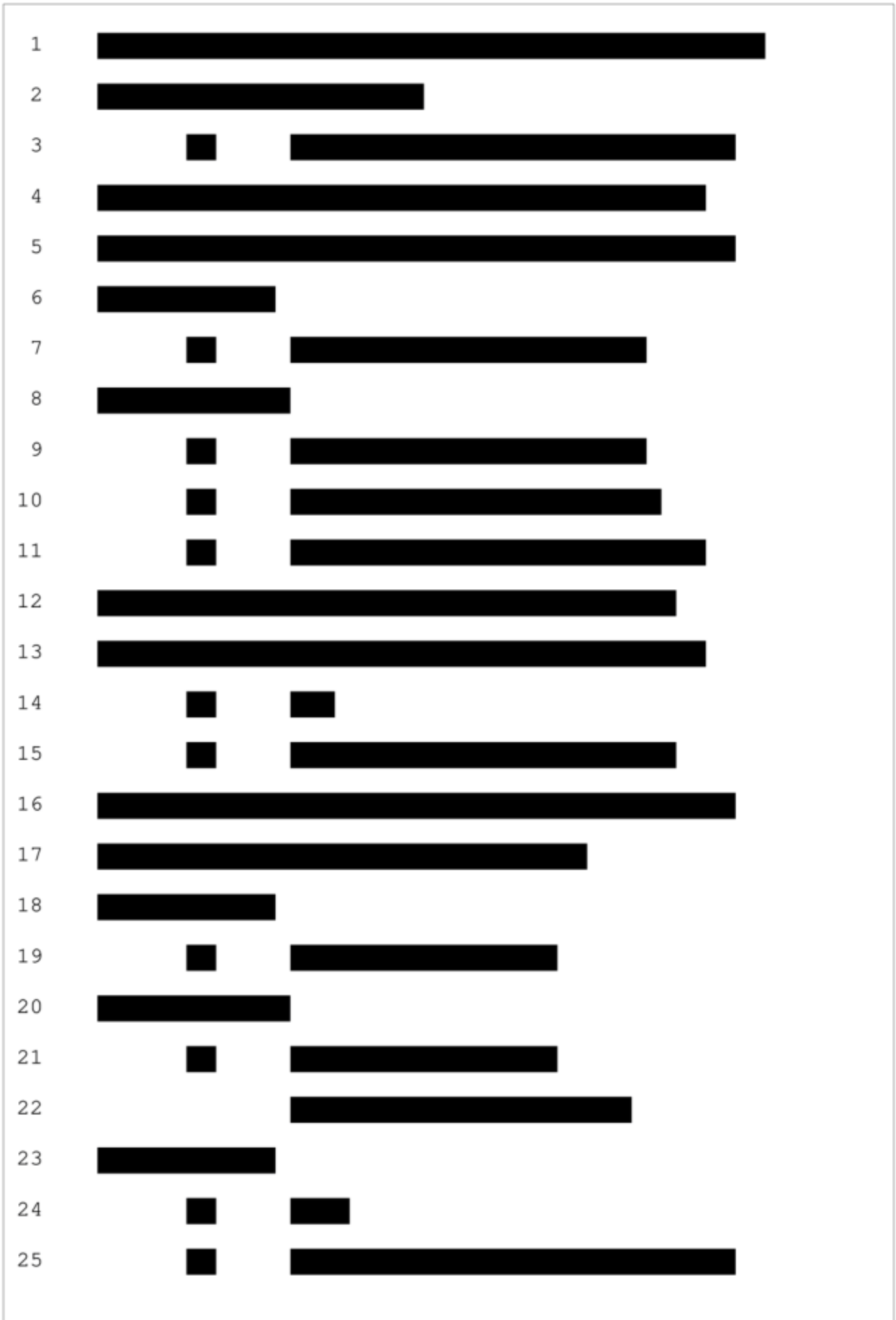


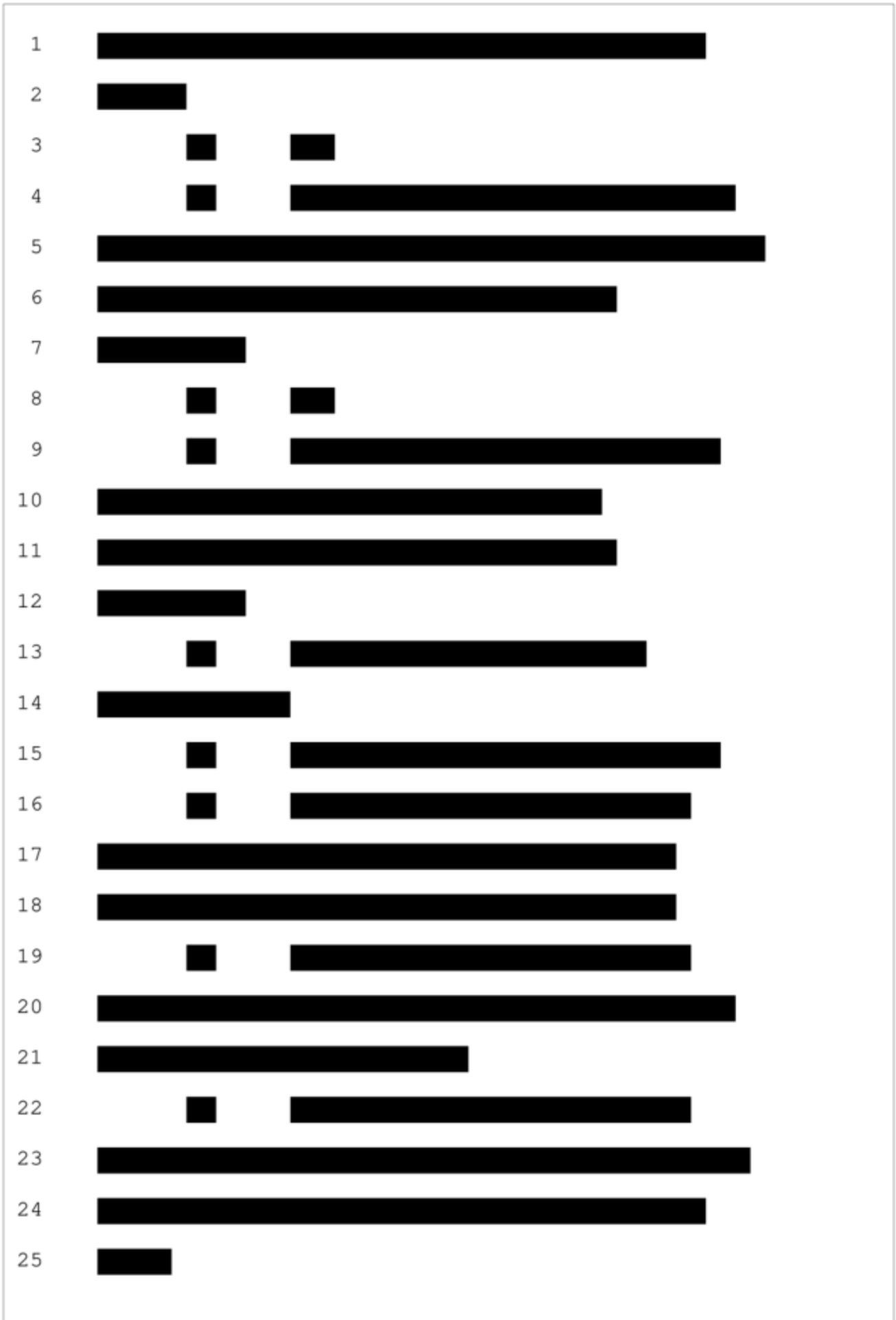












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Q. Do you remember, did you walk to 301?

A. I don't recall.

Q. Did you ever walk to Jeffrey's townhouse from your place?

A. Yes.

Q. Okay. Is that typically how you would visit, is you would walk from your place to his?

A. No.

Q. There was an e-mail that we looked at yesterday where you were writing to somebody else in JPMorgan that you spoke with Jeffrey Epstein and he denied the ages.

Do you remember that?

A. Yes.

Q. And he had been accused at that point in time of having erotic massages with a bunch of children and paying them for it.

Do you remember that? Those being the allegations?

A. In what year are you talking about?

Q. Sure. This is after he was indicted in 2006 and before he pleads guilty

in 2008.

During that period of time, he was accused of sexual interactions with children, and he was paying them money, right?

A. I don't recall them being called children, though.

Q. Okay. Well, you remember that the charge was procurement of a minor for prostitution?

A. Yes.

Q. And he was essentially charged with obtaining erotic massages from young females who, during the course of that investigation, were revealed to be underage, and he was paying them cash in exchange for those erotic massages.

Do you remember that?

A. Yes.

Q. And you reported back to the bank that Jeffrey Epstein denied the ages, correct?

A. That's correct.

Q. Jeffrey Epstein was not denying the conduct, right?

A. That's right.

Q. The conduct that he was being accused of, he was admitting that he did it. He was just denying that he knew the ages of the victims, right?

A. Correct.

Q. And you were reporting that back to the bank, that what was being denied is the ages, right?

A. Right.

Q. So the bank has, essentially, all of the information that you had at the time, which is that Jeffrey Epstein is admitting to this conduct of engaging in sex for money with young women. And the only thing he was disputing is the age of the -- of the potential victims, right?

A. Right.

Q. So the bank is understanding -- is getting an e-mail from you that Jeffrey Epstein, the only thing he's contending over here is the ages, right?

A. Yes.

Q. And so when the bank is receiving that information, they now know

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what you know, which is, this is the type of conduct that our client is engaging in, and the only dispute that he has about the allegations are the ages of the victims, right?

A. That's correct.

Q. And based on that information that they are receiving, meaning JPMorgan is receiving, Stephen Cutler and anybody else who had the ability to exit Jeffrey Epstein elect instead to keep Jeffrey Epstein as a client, right?

A. Yes.

Q. There was a point that was made earlier about your sharing information that was internal JPMorgan information not to be disseminated to the public.

Do you remember that?

A. Yes.

Q. And it was framed as a potential violation of the code of conduct in that information that was internal information to JPMorgan was being shared with Jeffrey Epstein.

Do you remember that?

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