

EXHIBIT 1  
(FILE UNDER SEAL)

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

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

Case No:

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----x

HIGHLY CONFIDENTIAL  
DEPOSITION OF SARAH RANSOME  
NEW YORK, NEW YORK  
Friday, February 17, 2017

Reported by:

JEREMY RICHMAN

JOB NO: 300491

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

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1 HIGHLY CONFIDENTIAL AEO

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3

4 February 17, 2017

5 9:00 a.m.

6

7 DEPOSITION of SARAH RANSOME, held  
8 at the offices of Boies, Schiller & Flexner,  
9 575 Lexington Avenue, New York, New York,  
10 before JEREMY RICHMAN, a Shorthand Reporter and  
11 Notary Public of the State of New York.

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1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES:

3

4 BOIES, SCHILLER & FLEXNER, LLP

5 Attorneys for plaintiff

6 401 East Las Olas Boulevard, Suite 1200

7 Fort Lauderdale, FL 33301-2211

8 BY: SIGRID STONE MCCAWLEY, ESQ.

9 (smccawley@bsfllp.com)

10

11

12 HADDON, MORGAN AND FOREMAN, P.C

13 Attorneys for Defendant

14 150 East 10th Avenue

15 Denver, CO 80230

16 BY: LAURA A. MENNINGER, ESQ.

17 JEFFREY S. PAGLIUCA, ESQ.

18 (lmenninger@hmflaw.com)

19 (jpagliuca@hmflaw.com)

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1 HIGHLY CONFIDENTIAL AEO

2 APPEARANCES (Continued):

3

4 J. STANLEY POTTINGER, PLLC

5 Attorneys for the witness

6 49 Twin Lakes Road, Suite 100

7 South Salem, NY 10590

8 BY: J. STANLEY POTTINGER, ESQ.

9 (stanpottinger@aol.com)

10

11

12 MINTZ & GOLD, LLP

13 Attorneys for the witness

14 600 Third Avenue

15 New York, NY 10016

16 BY: PETER GUIRGUIS, ESQ.

17 (guirguis@mintzandgold.com)

18

19

20 ALSO PRESENT:

21 GHISLAINE MAXWELL, via teleconference

22

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

10                  MS. MCCAWLEY:   Sigrid  
11           McCawley on behalf of Virginia  
12           Giuffre, the plaintiff in the  
13           action.

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2                   and testified as follows:

3                   EXAMINATION BY

4                   MS. MENNINGER:

5           Q.       Good morning, Ms. Ransome.

6           A.       Good morning.

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

9           A.       Sarah Emma Ashley Ransome.

10          Q.       And what is your birth date?

11          A.       ████████████████████

12          Q.       And what is your current  
13 address?

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

16          Q.       You can answer.

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

19          A.       ████████████████████

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

22          A.       ████████████████████

████████████████████

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



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I reside there.

3           Q.       Do you rent an apartment?

4           A.       My partner does.

5           Q.       Who is your partner?

6                   MR. GUIRGUIS:  Objection.

7           Q.       Who is your partner?

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

10                   MR. GUIRGUIS:  Yes.

11          A.       [REDACTED]

12          Q.       I'm sorry?

13          A.       [REDACTED]

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

16          A.       [REDACTED]

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

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

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

25                   THE WITNESS:  Sorry, can I

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

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

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

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

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

17          Q.       And what is your current  
18          occupation?

19          A.       I'm a writer.

20          Q.       And what do you write?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       Are you employed?

5           A.       Nope.

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

8           A.       My partner --

9                   MR. GUIRGUIS: I'm going to  
10 object to that. Income is out.

11                  You don't have to answer  
12 that.

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2                   deposition?

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

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

16                  MR. GUIRGUIS: I just  
17                  objected.

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

25                  MS. MENNINGER: I have asked

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

5                   MS. MCCAWLEY:   Yes.

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

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

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

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

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

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

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

24          A.       No.

25          Q.       Have you sought to have your

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1                   HIGHLY CONFIDENTIAL AEO

2       writing published by anyone?

3           A.       No.

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

6                   MR. GUIRGUIS:   Objection.

7                   MS. MCCAWLEY:   Objection.

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

14                 A.       ██████████ ██████████ ██████████ ██████████  
15                  ██████████ ██████████

16                 Q.       How do you spell ██████████

17                 A.       ██████████

18                 Q.       And where do your parents  
19                  live?

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

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

25                         MS. MCCAWLEY: Do you want

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1                   HIGHLY CONFIDENTIAL AEO

2                   to confer?

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

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

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

8                   (Recess.)

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

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

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

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



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1                   HIGHLY CONFIDENTIAL AEO

2                   concerns.

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

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

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

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

20                  MS. MENNINGER: All right.

21                  Q.       Ms. Ransome, did you agree  
22                  to be a witness in the case of Giuffre  
23                  versus Maxwell?

24                  A.       Yes.

25                  Q.       Did you voluntarily agree to

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1                   HIGHLY CONFIDENTIAL AEO

2       do that?

3           A.       Yes.

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

7           A.       No.

8           Q.       Were you provided legal  
9       counsel?

10          A.       Sorry, does that mean --

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

13                   MR. GUIRGUIS:   Yes.

14          A.       Yes.

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

17          A.       Three.

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

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

25                   MR. GUIRGUIS:   There is

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1           HIGHLY CONFIDENTIAL AEO  
2           absolutely no exchange. No words  
3           were spoken by --

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

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

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

13          MS. MENNINGER: Mm-hmm.

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

18                   MR. POTTINGER:   I am not.

19           Q.       Ms. Ransome, how many  
20   lawyers do you think you have?

21           A.       Three.

22           Q.       Can you please name them?

23           A.       Peter, Sigrid and Stan.

24           Q.       Is Mr. Bradley Edwards  
25   representing you?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.

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

5           A.       No.

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

8           A.       Yes.

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

15                   That's five, correct?

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

18          Q.       No, you cannot.

19          A.       Okay.

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

22                   MR. GUIRGUIS: Objection.

23          Q.       Yes or no?

24          A.       Yes.

25          Q.       All right. Anyone else

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1                   HIGHLY CONFIDENTIAL AEO

2       representing you?

3           A.       No.

4           Q.       Ms. Schultz? Is

5       Ms. Meredith Schultz representing you?

6           A.       No.

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

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

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

13          A.       No.

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

16          A.       No.

17                   MR. GUIRGUIS: Objection.

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

20                   MR. GUIRGUIS: Objection.

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

24          A.       A few, maybe.

25          Q.       How many?



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       About 11 hours in total.

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

5                   MR. GUIRGUIS:   Objection.

6                   MS. MCCAWLEY:   You can  
7 answer.

8                   MR. GUIRGUIS:   You can  
9 answer.

10          A.       Yesterday.

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

13          A.       Yes.

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

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

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

21          A.       No.

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

24          A.       I don't know.

25          Q.       How many hours have you

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1                   HIGHLY CONFIDENTIAL AEO

2       spent with Ms. McCawley?

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

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

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

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

17          A.       Many, many hours.

18          Q.       Approximately how many?

19          A.       I don't know.

20          Q.       Five?

21                   MR. GUIRGUIS: Objection.

22          A.       More than five.

23          Q.       Ten?

24                   MR. GUIRGUIS: Objection.

25          Q.       Ten?

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1                   HIGHLY CONFIDENTIAL AEO

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

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

8           A.       I think it was --

9           Q.       Without telling me what you  
10 said.

11          A.       I think it was November.

12          Q.       November what?

13          A.       I can't remember the date.

14          Q.       Early November? Late  
15 November?

16                   MR. GUIRGUIS: Objection.

17          A.       I can't remember.

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

20          A.       Cell phone.

21          Q.       A mobile number or a  
22 landline?

23          A.       A cell phone.

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I don't have it anymore.

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

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

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

11          A.       About eight months.

12          Q.       What happened to it?

13          A.       I got rid of it.

14          Q.       Why?

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

18          Q.       What did you do with it?

19          A.       I sold it.

20          Q.       When?

21          A.       November.

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

24          A.       Before.

25          Q.       So then how did you speak

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1                   HIGHLY CONFIDENTIAL AEO

2       with Ms. McCawley over the phone?

3           A.       On my partner's cell phone.

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

6                   MS. MCCAWLEY:   Objection.

7           What's the relevance of her  
8       partner's cell phone?

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       When in November?

3           A.       I can't remember.

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

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

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

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

12          Q.       And where was that meeting?

13          A.       Barcelona.

14          Q.       Where in Barcelona?

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

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

19          A.       In a hotel.

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

22          A.       Two days.

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

25          A.       Gosh, about 16.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       How many hours did you spend  
3 with Mr. Edwards?

4                   MS. MCCAWLEY:   Objection.

5           A.       The same amount.

6           Q.       He was with Mr. Pottinger?

7           A.       Yeah, yes.

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

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

12          Q.       Have you met him?

13          A.       No.

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

16          A.       No.

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

20          A.       Yes.

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

25                   MR. GUIRGUIS:   Objection.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Did you fly over here?

4           A.       Yes.

5           Q.       From Barcelona?

6           A.       Yes.

7           Q.       Did you pay for the plane  
8 ticket?

9           A.       Yes.

10          Q.       How much was the plane  
11 ticket?

12          A.       It was -- I think it was  
13 1,000 -- it was 1,000 -- I can't  
14 remember the exact total.

15          Q.       Has anyone agreed to  
16 reimburse you for that?

17          A.       No.

18          Q.       And you're staying where  
19 while you're here?

20                   MR. GUIRGUIS: Objection.

21                   And direct you not to answer  
22 that.

23          Q.       Are you staying in a hotel  
24 while you're here?

25                   MR. GUIRGUIS: You can



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1                   HIGHLY CONFIDENTIAL AEO

2                   answer that.

3                   A.        Yeah.

4                   Q.        Are you paying for that?

5                   MR. GUIRGUIS:   Objection.

6                   I'm directing you not to  
7                   answer.

8                   MS. MCCAWLEY:   You can  
9                   answer.

10                  MR. GUIRGUIS:   I think you  
11                  can answer.

12                  MS. MCCAWLEY:   Yeah, I think  
13                  you can answer.

14                  MR. GUIRGUIS:   That's fine.  
15                  I agree.

16                  MS. MCCAWLEY:   You're a  
17                  nonparty witness.   You can answer  
18                  that question.

19                  MS. MENNINGER:   Who is --

20                  MS. MCCAWLEY:   I am  
21                  representing Virginia.   He is  
22                  representing the witness.

23                  MS. MENNINGER:   Well, you're  
24                  representing the witness as well,  
25                  right?

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1                   HIGHLY CONFIDENTIAL AEO

2                   MS. MCCAWLEY: I'm not.

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

6                   MS. MCCAWLEY: I did.

7           Q.       Are you paying for the  
8           hotel?

9           A.       No.

10          Q.       Who's paying for the hotel?

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

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

16          A.       No.

17          Q.       It's not you?

18          A.       No.

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

21          A.       I have no idea.

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

24          A.       Just for the deposition.

25          Q.       Okay. When did you arrive?

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       And when are you leaving?

5           A.       Tomorrow evening.

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

10          A.       No.

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

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

15          A.       Sorry.

16          Q.       Have you been given anything  
17   else?

18          A.       No.

19          Q.       Have you been promised  
20   anything else?

21          A.       No.

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

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1                   HIGHLY CONFIDENTIAL AEO

2                   MS. MCCAWLEY:   Objection.

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

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

10          A.       Yes.

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

13          A.       No.

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

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

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

21          A.       Oh, no.   No.

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

24          A.       No.   No.

25          Q.       All right.   So have you had

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1                   HIGHLY CONFIDENTIAL AEO

2       any agreements regarding writing a  
3       book --

4           A.       No.

5           Q.       -- about your experience?

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

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

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

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

19           A.       Can you please repeat the  
20      question.

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

24           A.       No.

25           Q.       Have you talked to anyone

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1                   HIGHLY CONFIDENTIAL AEO

2       about publishing anything relating to  
3       your story?

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

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

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

10          A.       Yes, I have.

11          Q.       Who have spoken to?

12          A.       The New York Post.

13          Q.       Who at the New York Post?

14          A.       Maureen Callahan.

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

17          A.       I think it was later  
18       October.

19          Q.       Have you spoken with her  
20       since?

21          A.       No.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

9           A.       No.

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

12          A.       No.

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

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

25          Q.       Where is the email that you

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1                   HIGHLY CONFIDENTIAL AEO

2       wrote her?

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

5           Q.       Okay.   In your Yahoo  
6       account?

7           A.       Yes.

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

11          A.       Yes.

12          Q.       And what was that agreement?

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

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



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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

8           A.       Yes.

9           Q.       More than one?

10          A.       Yes.

11          Q.       How many?

12          A.       I can't remember.

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

15          A.       Less than ten.

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

18          A.       Just one.

19          Q.       And it lasted about 30  
20       minutes?

21          A.       About that.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       just same old stuff, just continuing.

3       I thought he had stopped abusing  
4       girls.

5           Q.       What do you recall reading a  
6       article that Jeffrey Epstein was  
7       doing?

8           A.       I can't remember.

9           Q.       Anything at all?

10          A.       You can read the article. I  
11       can't remember.

12          Q.       The question is what you  
13       remember.

14          A.       I can't remember.

15          Q.       You remember nothing else  
16       about the article --

17                   MS. MCCAWLEY: Asked and  
18       answered objection.

19          Q.       -- except it was related to  
20       Jeffrey Epstein and it ended with the  
21       sentence that you've described?

22                   MS. MCCAWLEY: Objection,  
23       asked and answered.

24          A.       Yes.

25          Q.       What do you know about other

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1 HIGHLY CONFIDENTIAL AEO

2 girls being frightened?

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

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

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       time with Ghislaine and Jeffrey that  
3       were frightened.

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

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

11          Q.       Okay. Please describe them.

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

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

17          A.       Okay. On the island --

18                   MR. GUIRGUIS: Objection.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       names.

3                   You gave me three, correct?

4           A.       Yes.

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

7           A.       Mm-hmm.

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

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

13          Q.       Anything else about that?

14          A.       I can't remember.

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

17          A.       No, I can't remember.

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

20          A.       No, I can't remember.

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

23          A.       No.

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       In New York.

3           Q.       Where in New York?

4           A.       I can't remember.

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

7           A.       No. It was ten years ago.

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

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

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

15          A.       I can't remember.

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

18          A.       I don't know.

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

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

22          Q.       How long?

23          A.       Long, long hair.

24          Q.       Longer than your hair now?

25          A.       I think so. I think it was



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1                   HIGHLY CONFIDENTIAL AEO

2       longer.

3           Q.       So middle of her back?

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

6           Q.       Where did you meet [REDACTED]

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

9           Q.       Where in New York?

10          A.       I can't remember.

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

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

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

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

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

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Was it at a club?

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

7           Q.       Was it at a club?

8           A.       One was at a club.

9           Q.       Which one?

10          A.       ██████████ ██████████ .

11          Q.       Where did you meet ██████████

12          A.       I first met ██████████ on the  
13       island.

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

16          A.       Yes.

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

19          A.       I can't remember.

20          Q.       State?

21          A.       Can't remember.

22          Q.       Country?

23          A.       Well, U.S.

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

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1                   HIGHLY CONFIDENTIAL AEO

2                   go to the bathroom. Sorry.

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

5                   We'll go off the record now.

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

7                   (Recess.)

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

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

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

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

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

20                A.       Yes.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

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

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

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

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

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

17          A.       No.

18          Q.       Nowhere?

19          A.       No.

20          Q.       Did you see any articles  
21 about Virginia Roberts?

22          A.       Yes.

23          Q.       Which articles did you see  
24 about Virginia Roberts?

25          A.       I can't remember. It was

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1                   HIGHLY CONFIDENTIAL AEO

2       quite some time ago.

3           Q.       What do you recall about it?

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4                   MS. MCCAWLEY:   Objection.

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

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

11          A.       No.

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

14          A.       Sorry, can you repeat that.

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

17          A.       No.

18          Q.       Where did you grow up?

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

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

23          A.       I was 14.

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Just myself.

3           Q.       Are you a South African  
4 citizen?

5           A.       Yes.

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

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

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

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

17          Q.       And when was it stolen?

18          A.       I think it was 2014, 2015.

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

23                   Have I got that right?

24          A.       Mm-hmm.

25          Q.       Yes or no?

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Objection to  
3           form.

4                   You can answer.

5           A.       Yes.

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

8           A.       Yes.

9           Q.       How did that come about?

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

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

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

16          Q.       Do you have a dual  
17   citizenship?

18          A.       Yes.

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

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



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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

15          A.       Yes.

16          Q.       How many?

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

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

23          A.       No.

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4                   MR. GUIRGUIS:   Objection.

5                   You can answer.

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

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

11      Q.       And cousins?

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

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

16      A.       About three years.

17      Q.       Did you graduate?

18      A.       Yep, yes.

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

21      A.       Yeah, it is.

22      Q.       Did you go to college?

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

25      Q.       Where did you go?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Queen Margaret University in  
3   Edinburgh.

4           Q.       Did you graduate?

5           A.       No, I didn't.

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

9           A.       No.

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

12          A.       2004.

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

15          A.       A year and a half.

16          Q.       Why did you leave college?

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

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

23          A.       Yes.

24          Q.       Where did you work?

25          A.       I was a waitress at a bar.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Anything else?

3 A. No.

4 Q. Have you ever been married?

5 A. No.

6 Q. Have you ever been engaged?

7 A. Yes.

8 Q. To whom?

9 A. [REDACTED] [REDACTED].

10 Q. Your current partner?

11 A. Yes.

12 Q. Anyone else?

13 A. Yes, I have.

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

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

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

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

22 A. [REDACTED] [REDACTED].

23 Q. Was he listed in your  
24 passport?

25 A. Yes.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Anyone else?

3           A.       Listed on my passport?

4       Sorry.

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

7           A.       Oh, sorry. I've got a  
8 really bad train... No.

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

11          A.       I can't remember.

12          Q.       Was it before 2006 or after?

13          A.       After.

14          Q.       How long after?

15          A.       Three years.

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

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

19       [REDACTED].

20                   Vaguely, vaguely. We lost  
21 contact.

22          Q.       When did you lose contact?

23          A.       In 2006.

24          Q.       And when did you reestablish  
25 contact?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       2008.

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

5           A.       No.

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

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

10          Q.       On Twitter?

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

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

16          A.       I can't remember.

17          Q.       Do you have any tattoos?

18          A.       Yes.

19          Q.       Where?

20          A.       One here.

21          Q.       Indicating on your arm?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Where is the second one?

3           A.       I've got four.

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

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

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

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

15          Q.       Which ones are they?

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

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

20          A.       No.

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

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

25          Q.       When did you do that?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       When I moved to New York.

3           Q.       In 2006?

4           A.       Correct.

5           Q.       Any other time?

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

11          Q.       Where?

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

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

21          A.       No.

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

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



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.    Yes.

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

5           A.       It was 2006.

6           Q.       Is that FIT?

7           A.       That's correct.

8           Q.       Anywhere else?

9           A.       No.

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

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

20          Q.       Did you have a modeling  
21 agent?

22          A.       I did in Scotland.

23          Q.       In college?

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

25          Q.       Any other time?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

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

5           A.       Just commercial.

6           Q.       Print?

7           A.       Yep.

8           Q.       Runway?

9           A.       Yep.

10          Q.       TV or ads?

11          A.       No.

12          Q.       And all in Scotland?

13          A.       No.

14          Q.       Where else did you model?

15          A.       New York.

16          Q.       Anywhere else?

17          A.       No.

18          Q.       London?

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4                   MR. GUIRGUIS:   Objection.

5           A.       I can't remember.

6           Q.       When did you work in  
7 superyachting?

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

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

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

17          Q.       So on and off?

18          A.       Yeah, on and off.

19          Q.       And since you were an adult?

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

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

24          A.       In South Africa.

25          Q.       And just so I understand,

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1                   HIGHLY CONFIDENTIAL AEO

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

4           A.       That's correct.

5           Q.       And then where did you move?

6           A.       To New York.

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

9           A.       About seven, eight months.

10          Q.       And where did you move?

11          A.       Back in London.

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

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

19          Q.       And then where did you move?

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

24          Q.       Did you work for a company?

25          A.       I worked for a private

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1                   HIGHLY CONFIDENTIAL AEO

2       owner.

3           Q.       On one yacht?

4           A.       On multiple yachts.

5           Q.       And what was your job?

6           A.       Stewardess -- stewardess,  
7       and then I was a deckhand.

8           Q.       With wine?

9           A.       Sorry?

10          Q.       What's a decant?

11          A.       A deckhand.

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

13                   THE WITNESS: Sorry.

14                   MS. MENNINGER: Oh,  
15       deckhand. I thought you were  
16       decanting wine. It's a pretty  
17       good job.

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

20          A.       I'm not allowed to specify.

21          Q.       Do you have a  
22       confidentiality agreement?

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

25          Q.       And how long were you

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1                   HIGHLY CONFIDENTIAL AEO

2       employed in superyachting?

3           A.       Two and a half years.

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

6           A.       I moved back to Cape Town.

7           Q.       So that was in 2014?

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

10          Q.       Between 2014 and 2016?

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

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

15          A.       No.

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

18          A.       Myself.

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

21          A.       Four years.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       December 2015.

3           Q.       Where did you move?

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

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

8           A.       Three months.

9           Q.       And then where did you move?

10          A.       Barcelona.

11          Q.       So in March 2016?

12          A.       Sorry, no, just hang on.  
13       Sorry. I moved to Barcelona around  
14       June, June last year.

15          Q.       2016 June?

16          A.       Yeah.

17          Q.       You moved to Barcelona?

18          A.       Yeah.

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

21          A.       Correct.

22          Q.       And who did you come with?

23          A.       Myself.

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Myself.

3           Q.       Why did you come?

4           A.       I wanted to advance my  
5 career.

6           Q.       What year?

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

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

11          A.       No.

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

14          A.       No.

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

17          A.       No.

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

20          A.       The Upper East Side.

21          Q.       With whom?

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

24          Q.       What was that person's name?

25          A.       ██████████



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1 HIGHLY CONFIDENTIAL AEO

2 Q. How do you spell [REDACTED]

3 A. [REDACTED]

4 Q. And what's the last name of

5 [REDACTED]

6 A. I can't remember.

7 Q. Male or female?

8 A. Male.

9 Q. How old?

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

11 Q. And how did you meet [REDACTED]

12 A. I met [REDACTED] just via -- I  
13 met him when -- why can't I remember?

14 I think, yeah, I was looking for an  
15 apartment when I got here so it was  
16 just a -- like, we just kind of met on  
17 the Upper East Side and, yeah, I said  
18 I was looking for somewhere to stay.

19 Q. Did you pay rent?

20 A. Yes.

21 Q. How much did you pay?

22 A. I can't remember.

23 Q. A thousand dollars?

24 MR. GUIRGUIS: Objection.

25 A. I think it was less than

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1                   HIGHLY CONFIDENTIAL AEO

2       that.

3           Q.       Did you have your own  
4       bedroom?

5           A.       No.

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

8           A.       There was another guy.

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

11          A.       With [REDACTED]

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

14          A.       No.

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

18          A.       That's correct.

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

21          A.       I can't remember.

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

24          A.       No, no, I don't.

25          Q.       Do you know approximately

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1                   HIGHLY CONFIDENTIAL AEO

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

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

7           Q.       Any of the cross-streets?

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

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

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

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

21          A.       It was an elevator building.

22          Q.       Was there a doorman?

23          A.       No.

24          Q.       What floor were you on?

25          A.       I can't remember.

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1                   HIGHLY CONFIDENTIAL AEO

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

4                   MR. GUIRGUIS: Objection.

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

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

10          A.       That's correct.

11                  MS. MCCAWLEY: Objection,  
12 misstates --

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

15          A.       I can't remember.

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

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

20          Q.       And where did you move?

21          A.       To Jeffrey Epstein's  
22 apartment.

23          Q.       What was the address to  
24 that?

25          A.       I think it was 2000 -

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       I'm sorry, what?

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

10          Q.       Okay.

11          A.       If I recall, yeah.

12          Q.       So it's 205 East something?

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

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

20          A.       No.

21          Q.       Did you have your own  
22       apartment?

23          A.       Yes.

24          Q.       How big was the apartment?

25          A.       It was massive.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       How many bedrooms did it  
3 have?

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

6           Q.       Two or seven?

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

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

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

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

17          A.       No.

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

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

22          Q.       Was there a doorman?

23          A.       Oh, I can't remember.

24          Q.       Was it a walkup or elevator?

25          A.       Elevator.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       What floor were you on?

3           A.       I can't remember.

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

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

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

13          A.       That's correct.

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

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

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

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

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

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

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Okay. Who else?

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

5 Q. None of them?

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

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

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

12 Q. How many?

13 MS. MCCAWLEY: Objection.

14 A. I can't remember.

15 Q. 50?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. A hundred?

19 MR. GUIRGUIS: Objection.

20 A. I can't remember.

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

23 MR. GUIRGUIS: Objection.

24 A. I can't remember.

25 Q. You can't remember if it was



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1                   HIGHLY CONFIDENTIAL AEO

2       more than a thousand?

3           A.       I can't remember.

4                   MR. GUIRGUIS:   Objection.

5                   MS. MCCAWLEY:   Objection.

6       This is harassing.

7                   MR. GUIRGUIS:   Objection.

8       We're crossing a line here.

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

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

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

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

25                   THE WITNESS:   In the

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1                   HIGHLY CONFIDENTIAL AEO

2           building.

3           Q.       Right. In the building.

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

6                   MR. GUIRGUIS: Objection.

7           A.       I can't remember.

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

10                  MR. GUIRGUIS: Objection.

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

13          Q.       Was it less than a hundred?

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

16          Q.       Was it less than 50?

17          A.       I can't remember.

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

21                  MR. GUIRGUIS: Objection.

22          A.       I can't remember.

23          Q.       Can you describe any of  
24   them?

25                  MR. GUIRGUIS: Objection.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember.

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

6                   MR. GUIRGUIS: Objection.

7           A.       I did freelance modeling.

8           Q.       Who did you do that for?

9           A.       Various photographers.

10          Q.       Do you have those  
11 photographs still?

12          A.       No.

13          Q.       Do you have a portfolio?

14          A.       I used to have one.

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

17          A.       No.

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

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

22          A.       Yeah, I got a couple.

23          Q.       Where are they?

24          A.       At home.

25          Q.       In Barcelona?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       That's correct.

3           Q.       Are they on a computer?

4           A.       No.

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

8                   MR. GUIRGUIS: Objection.

9           A.       Yes, there was.

10          Q.       What was that?

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

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

16                   MR. GUIRGUIS: Objection.

17           Hold on a second.

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

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

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

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

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

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

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

20          A. No.

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

23          A. That's correct.

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

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1                   HIGHLY CONFIDENTIAL AEO

2       visa, correct?

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

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

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

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

16       A.       That's correct.

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

21       A.       Yes, yeah.

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

25       A.       I started looking at

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

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

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

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

18                  A.       I had some savings.

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

21                  A.       No.

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

25                  A.       I did the occasional, I

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1                   HIGHLY CONFIDENTIAL AEO

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

5           Q.       What does that mean?

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

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

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

15          A.       It was through an agency.

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

18          A.       I can't remember.

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

21          A.       No.

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

25          A.       It depended how long the



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1                   HIGHLY CONFIDENTIAL AEO

2       dinner was for.

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

6           A.       \$1,500.

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

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

12          Q.       What time period?

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

15          Q.       Okay.

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

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

21                   MS. MENNINGER: Sure.

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

23                   (Recess.)

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

25          Q.       Approximately how many times

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1                   HIGHLY CONFIDENTIAL AEO

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

6           A.       I can't remember.

7           Q.       Ten times?

8                   MR. GUIRGUIS:   Objection.

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

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

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

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

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

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

22          A.       Yes, I did, yes.

23          Q.       What were the other sources?

24          A.       Jeffrey Epstein.

25          Q.       Any other source?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Who introduced you to  
4 Jeffrey Epstein?

5           A.       [REDACTED] [REDACTED]

6           Q.       And how did you meet [REDACTED]

7 [REDACTED]

8           A.       I met her in a nightclub.

9           Q.       Do you know which nightclub?

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

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

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

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

24          A.       Socially.

25          Q.       And were you with anyone?

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1 HIGHLY CONFIDENTIAL AEO

2 MR. GUIRGUIS: Objection.

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       nightclub, so -- especially girls.

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

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

9           Q.       Where were you?

10          A.       In the nightclub.

11          Q.       Where in the nightclub?

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

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

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

18          Q.       Was there a dance floor?

19          A.       Yes, there was.

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       Where did she kiss you?

5           A.       On the mouth.

6           Q.       Anywhere else?

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

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

11          A.       The first time we met?

12          Q.       Right.

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

18          Q.       Okay. Was that consensual  
19   sex?

20          A.       Yes, it was with [REDACTED]

21   [REDACTED]

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

24          A.       In the club the first time.

25          Q.       Where in the club?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       In the owner's office.

3           Q.       Was the owner present?

4           A.       Yes, the owner was present.

5           Q.       [REDACTED]

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

10          Q.       Sure.

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

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

19                   MR. GUIRGUIS: Objection.

20                   MS. MCCAWLEY: Objection.

21          Q.       Is that right?

22          A.       That's correct.

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

25                   MR. GUIRGUIS: Here's the

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1                   HIGHLY CONFIDENTIAL AEO

2           question.

3           A.       Yeah, that's correct.

4           Q.       Was anyone else present?

5           A.       No.

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

8           A.       I did.

9           Q.       How much?

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

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

15          A.       No, I don't.

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

18          A.       I don't remember.

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

21          A.       Yes, I did.

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

24          A.       From [REDACTED] and [REDACTED]

25          Q.       Anywhere else?



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1                   HIGHLY CONFIDENTIAL AEO

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

5           Q.       Anywhere else?

6           A.       No.

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

9           A.       No.

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

13          A.       No.

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

16          A.       I did.

17          Q.       What did you take?

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4           A.       I can't remember her name.

5           Q.       It was a woman?

6           A.       It was a woman.

7           Q.       And where was she located?

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

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

12          A.       I can't remember.

13          Q.       Did anyone go with you?

14          A.       No, I went on my own.

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

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

21          Q.       Were they in your name?

22          A.       Yes, they were.

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

25          A.       Jeffrey first put me in

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1                   HIGHLY CONFIDENTIAL AEO

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

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

9           A.       It was September 2006.

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

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

15          Q.       Who paid for that?

16          A.       I can't remember.

17          Q.       Why did you go back?

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

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

22          A.       I know I came in September.

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

25          A.       And then I left the country

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       When did you do that?

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

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

17          Q.       Where did you go?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       right back?

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

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

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

12          Q.       How were you able do that?

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

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

17          A.       No.

18          Q.       Never?

19          A.       No.

20          Q.       Does your family travel?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       said, right?

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

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

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

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

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

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

23      Q.       Okay.

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

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       They were what?

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

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

10          A.       Mm-hmm.

11          Q.       So you left in December?

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

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

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

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

25          Q.       From London?



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       From New York.

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

8           A.       Yeah, that's correct.

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

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

22          Q.       Okay.

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

8           A.       No.

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

11      [REDACTED]

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

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

18          A.       Yes.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2     girl and was just very friendly,  
3     pretty.

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

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

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

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

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

15          A.       No.

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

18          A.       The girls told me.

19          Q.       Who were the girls?

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

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

25          A.       That's correct.

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1                   HIGHLY CONFIDENTIAL AEO

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

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

7           Q.       Did you see her do that?

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

11          Q.       Got it.

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

14          A.       Yes.

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

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

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

23          A.       Different set of girls.

24          Q.       Okay.

25          A.       You know, there was a

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1                   HIGHLY CONFIDENTIAL AEO

2       constant flow of women, girls.

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

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

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

17          A.       Mm-hmm.

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

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

23          Q.       Do you know where she lived?

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

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1                   HIGHLY CONFIDENTIAL AEO

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

4           A.       No.

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

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

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

11          A.       Yes, I did.

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

14          A.       I don't remember.

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

17          A.       No, I have no idea.

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

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

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

25          A.       I can't remember my first

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1                   HIGHLY CONFIDENTIAL AEO

2       conversation with her.

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

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       them a lot, actually.

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

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

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

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

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

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

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



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

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

9           A.       Through [REDACTED]

10          Q.       Tell me about that.

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

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

25                   Then we -- he was helping

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1                   HIGHLY CONFIDENTIAL AEO

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

4           Q.       That's what she told you?

5           A.       Yes.

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

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

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

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

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

23          A.       It was in person.

24          Q.       Was anybody else there?

25          A.       I think [REDACTED] could have been

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

17                   MR. GUIRGUIS: Objection to  
18      form.

19          Q.       What happened next?

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

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

24          Q.       How?

25          A.       We went to -- the first

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1                   HIGHLY CONFIDENTIAL AEO

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

5           Q.       How did that meeting get  
6       arranged?

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

10          Q.       And what movie did you see?

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

13          Q.       Did you sit with him?

14          A.       Yes, I did.

15          Q.       Next to him?

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

18          Q.       You, ██████████ ten other  
19       girls and Jeffrey?

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

24          Q.       And where was the theater?

25          A.       I can't remember the exact

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

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

12           Q.       It was somewhere in New  
13      York?

14           A.       It was in New York.

15           Q.       And you went with [REDACTED]

16           A.       Yes.

17           Q.       How did you go?

18           A.       By cab.

19           Q.       From your apartment with

20      [REDACTED]

21           A.       Yes.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

6                   MR. GUIRGUIS:   Objection.

7           A.       No.

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

10                  MR. GUIRGUIS:   Objection.

11          A.       I got in a taxi.

12          Q.       And?

13                  MR. GUIRGUIS:   Objection.

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

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

19          A.       I went home.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

8           A.       That's correct.

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

11          A.       No, I can't remember.

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

15          A.       Pretty soon after.

16          Q.       What does that mean to you?

17          A.       Couple days.

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

20          A.       In New York.

21          Q.       Where?

22          A.       I can't remember.

23          Q.       At his house?

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

25          Q.       Was anyone else there the

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1                   HIGHLY CONFIDENTIAL AEO

2       second time you met him?

3           A.       ██████████

4           Q.       Anyone else?

5           A.       No, not that I recall.

6           Q.       Anything memorable about  
7       that event?

8           A.       Nothing, nothing memorable.

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

11          A.       No.

12          Q.       At the first meeting?

13          A.       No.

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

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

25          Q.       And what did you do?



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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Objection.

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

5           Q.       Where was the plane located?

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

9           Q.       Did you fly commercially or  
10   private?

11          A.       Private.

12          Q.       Was it Jeffrey's plane?

13          A.       Yes.

14          Q.       Who else was on the plane?

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

20          Q.       Had you met ██████████ before?

21          A.       No.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

5           A.       No, not the first time.

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

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

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

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

14          Q.       So sometime between  
15       September and December?

16          A.       That's correct.

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

19          A.       I did.

20          Q.       Did you take pictures?

21          A.       I took a couple.

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       up, we took off.

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

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

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

15           A.       No, I didn't.

16           Q.       Did anyone ask you to?

17           A.       No.

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

21           A.       No.

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

25                   MS. MCCAWLEY: Objection.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember.

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

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

11          Q.       How long was the plane ride?

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

14          Q.       Did you say anything?

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

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

21                   I'm going to reach over?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

12          A.       Okay.

13          Q.       -- so I will remember later.

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

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

18          A.       In front of me.

19          Q.       Okay.

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

21          Q.       Is it one seat in a row?

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

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1                   HIGHLY CONFIDENTIAL AEO

2       on the back of the plane --

3           Q.       Okay.

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

8           Q.       Okay.

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

11          Q.       I understand.

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

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

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

24          Q.       Were there bathrooms on the  
25       plane?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.

3           Q.       Where were they?

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

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

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

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

13          A.       No.

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

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

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

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

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



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1                   HIGHLY CONFIDENTIAL AEO

2                   It's really bad.

3                   MR. GUIRGUIS:   Just hand it  
4                   over.

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

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

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

11                  Q.       Was there an office area?

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       later.    It was really nice.

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

5           A.       A few days.

6           Q.       Was it a week or two days?

7           A.       I can't remember.

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

12                   MR. GUIRGUIS:  Objection.

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Any other guests?

3           A.       No, not that first trip.

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

7           A.       Yes.

8           Q.       What happened?

9                   MR. GUIRGUIS: Objection.

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

12          Q.       And how did that come about?

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

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

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

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

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

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

13           A.       Yes.

14           Q.       That was not sexual?

15           A.       That was not sexual, no.

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

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

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

24           A.       On the island or --

25           Q.       No, on the plane. Just on

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1                   HIGHLY CONFIDENTIAL AEO

2     the plane.

3           A.       Jeffrey asked me to massage  
4     him.

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

7                   MS. MCCAWLEY:   Objection.

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

15    [REDACTED]

16          Q.       Okay.

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

20          Q.       You were rear-facing?

21          A.       Yeah.

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

25          A.       Yeah.   We switched seats a

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1                   HIGHLY CONFIDENTIAL AEO

2       few times.

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

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

8           Q.       In front of where you were?

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2       speculating.

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

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

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

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

16          Q.       Was he wearing clothes?

17          A.       Yes.

18          Q.       During the whole massage?

19          A.       During the whole massage,  
20       yes.

21          Q.       What was he wearing?

22          A.       I don't remember.

23          Q.       Did he have on shoes?

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

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1                   HIGHLY CONFIDENTIAL AEO

2       took his shoes off to have the  
3       massage.

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

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

9           Q.       Were you surprised by that  
10      request?

11          A.       No.

12          Q.       Why not?

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

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

18          A.       No.

19          Q.       Did you expect him to?

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



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1                   HIGHLY CONFIDENTIAL AEO

2       It's not very businesslike.

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

5           A.       Yes.

6           Q.       Where was the second  
7       massage?

8           A.       On his island.

9           Q.       Where on the island?

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

16          Q.       Who asked you to do that?

17          A.       ████████████████████

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

20          A.       Yes.

21          Q.       Did she travel with you?

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

9           A.       Several.

10          Q.       How many?

11          A.       Several. Several times.

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

14          Q.       Three times?

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

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

19          A.       Yeah.

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

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

25          Q.       Do you know how many times

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1                   HIGHLY CONFIDENTIAL AEO

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

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

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

13                   MR. GUIRGUIS: Objection.

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

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

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

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

25          A.       Jeffrey's speedboat.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Was that the only method?

3           A.       Also a helicopter.

4           Q.       Who flew the helicopter?

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

6           Q.       Was he cute?

7                   MR. GUIRGUIS:  Objection.

8           A.       I don't remember.

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

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

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

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

25          A.       Yes.

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1                   HIGHLY CONFIDENTIAL AEO

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

4           A.       Yes.

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

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

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

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

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

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1                   HIGHLY CONFIDENTIAL AEO

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

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

7           A.       Yes.

8           Q.       Were you clothed?

9           A.       Yes.

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

12          A.       No.

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

15          A.       The next day.

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

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

20          Q.       Who called you?

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

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

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       It was a female. It was  
3 either [REDACTED] [REDACTED] or [REDACTED] so I  
4 can't remember which of the two that  
5 called me, because they called me many  
6 times during the duration of my trip.

7           Q.       So when you say called me,  
8 what does that mean?

9           A.       They come up to me and say,  
10 please go to Jeffrey's bedroom and  
11 massage Jeffrey. He is waiting for  
12 you.

13          Q.       What time of day was it?

14          A.       I think it was -- I can't  
15 remember what specific time of day it  
16 was.

17          Q.       Can you kind of describe the  
18 island for me. Were there more than  
19 one building on it?

20          A.       Yeah, there were multiple  
21 buildings. You had the main house.  
22 You had certain accommodation areas  
23 where the girls sit.

24                   There were various buildings  
25 around the island where he used to

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1                   HIGHLY CONFIDENTIAL AEO

2       have all -- him and his other guests,  
3       like beds and beds, like little  
4       shelter things where him and his  
5       guests used to have sex with the  
6       girls, like beds set up for instant  
7       sexual entertainment. So --

8           Q.       On a beach area?

9           A.       All over the island. All  
10       over the island. So if you go on one  
11       of his quad bikes and do a tour of his  
12       island, which I'm sure you guys have  
13       done, you will see multiple buildings  
14       around the island.

15          Q.       And where were you staying  
16       during this first trip?

17          A.       I was staying in one of the  
18       guest houses that [REDACTED] -- the main  
19       guest house that all the girls shared.

20          Q.       Were you staying in your own  
21       room?

22          A.       No.

23          Q.       Who were you sharing a room  
24       with?

25          A.       [REDACTED] I think [REDACTED]



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1                   HIGHLY CONFIDENTIAL AEO

2       slept in the bungalow; she didn't stay  
3       there per se. She was explained to be  
4       Jeffrey Epstein's girlfriend at the  
5       time.

6           Q.       When you were asked to give  
7       Jeffrey a massage on the third  
8       occasion by a female, do you recall  
9       what words were used?

10          A.       I can't remember the exact  
11       words, no. But I was -- it was  
12       generally -- it was, can you please go  
13       and give Jeffrey -- it's kind of like  
14       your turn type of thing.

15          Q.       Did you know where his  
16       bedroom was?

17          A.       I was shown to his bedroom.

18          Q.       Who showed you to his  
19       bedroom?

20          A.       I can't remember who showed  
21       me to his bedroom.

22          Q.       All right. Tell me what  
23       happened during the third massage?

24          A.       So I went into Jeffrey  
25       Epstein's bedroom. His bedroom is

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1                   HIGHLY CONFIDENTIAL AEO

2   ice-cold; it's always ice-cold.   He  
3   likes his bedrooms very well air  
4   conditioned.

5                   There was a massage table  
6   laid out in his bedroom.   He asked me  
7   to undress and that he wanted to give  
8   me a massage, and he asked me to lay  
9   on the table.   He then started  
10   touching my body.

11                  I was -- I was -- it didn't  
12   start off as a sexual massage; it was  
13   just -- you know, it was just doing a  
14   normal massage, and then he started to  
15   touch me.   He touched my vaginal  
16   region and he touched me all over.

17           Q.       Were you draped with a  
18   towel?

19           A.       No.

20           Q.       For no part of the massage?

21           A.       For the -- I can't remember.

22           Q.       Was anyone else present in  
23   the room?

24           A.       No.

25           Q.       And after he started

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1                   HIGHLY CONFIDENTIAL AEO

2       touching you while you were on the  
3       table, did you give him a massage?

4           A.       I can't remember the  
5       specific sequence of events, but I  
6       remember the third massage, it wasn't  
7       for Jeffrey; it was for me. He  
8       performed the massage on me.

9           Q.       Did you tell him to stop?

10          A.       No, I didn't.

11          Q.       Did you have any sexual  
12       contact with him?

13          A.       No, he just touched me. And  
14       he was touching himself too, so...

15          Q.       Did you have an orgasm?

16          A.       I did have an orgasm. He  
17       used a specific vibrator on me, which  
18       it was quite hard not to.

19          Q.       Can you describe it?

20          A.       Yeah. It's quite big. It's  
21       not an actual vibrator. It's really  
22       good; you should get one if you don't.

23                   THE WITNESS: Sorry. I'm  
24       allowed to talk. Okay. Sorry.

25          A.       It's -- I'll -- can I draw

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1                   HIGHLY CONFIDENTIAL AEO

2     it?   Can I draw it?   I'll draw you the  
3     exact -- I can actually get you -- I  
4     actually own one, so I can get you a  
5     photo of it, you know.   It's also in  
6     the pictures in the dentist chair, in  
7     one of the photos, so...

8                   It's like this.

9                   THE WITNESS:   I'm sorry.

10                  MR. GUIRGUIS:   You're fine.

11                  MS. MCCAWLEY:   You're fine.

12                  A.       So it's actually a massager  
13     for shoulders.   It's got a long base.  
14     It's got quite a -- it's got like a  
15     rubber white head.

16                  And, yeah, it was really --  
17     it's not -- it's not used for sexual  
18     purposes.

19                  Q.       It's not?

20                  A.       No, that's what I'm saying.  
21     It's not a vibrator.

22                  Q.       Okay.

23                  A.       It was actually quite  
24     painful for me --

25                  Q.       Okay.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       -- actually.

3           Q.       Okay. Did you tell him to  
4 stop?

5           A.       I told him to stop when  
6 he -- because he pressed the vibrator  
7 head on my clitoris and it was  
8 incredibly painful. It hurt me.  
9 That's a very sensitive area, and the  
10 strength of this specific device he  
11 used is -- it's not really meant for  
12 that.

13          Q.       Right. Did he stop when you  
14 said stop?

15          A.       No.

16          Q.       And how long did this  
17 massage --

18          A.       Until -- until I orgasmed.

19          Q.       And then what happened?

20          A.       He just stopped. And I got  
21 dressed and I left.

22          Q.       Was there any discussion?

23          A.       No.

24          Q.       Did he give you any money?

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Can we stop  
3                   for a moment? The witness is  
4                   crying. I think maybe we should  
5                   take a moment, have a moment.

6                   MS. MENNINGER: Okay. Mark  
7                   that as Defendant's Exhibit 2,  
8                   and then we'll take a break for  
9                   ten minutes.

10                  (Defendant's Exhibit 2,  
11                  hand-drawn picture, was marked  
12                  for identification.)

13                  (Time noted: 12:07 p.m.)

14                  (Recess.)

15                  (Time noted: 12:19 p.m.)

16                  Q. So you just described for  
17                  us, I think, what you recall being the  
18                  third message with Jeffrey?

19                  A. Yeah.

20                  Q. Do you recall the next one  
21                  after that?

22                  A. It was -- it was basically  
23                  the same. I was called to give  
24                  Jeffrey massages.

25                  Q. During that first trip to

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1                   HIGHLY CONFIDENTIAL AEO

2   the island?

3           A.       During the first trip, yeah.

4           Q.       Can you approximate how many  
5   messages you gave to him during that  
6   first trip?

7           A.       I would give him up to maybe  
8   two a day. The other girls, they had  
9   to also give him massages during that  
10  trip.

11          Q.       And you don't remember how  
12  many days that trip was?

13          A.       No, not specifically how  
14  many. It was a few days. It was a  
15  few days.

16          Q.       At some point did the  
17  messages become different than the one  
18  you just described as the third  
19  message?

20          A.       It was either Jeffrey lying  
21  on the massage -- me massaging him and  
22  it turning sexual or vice versa.  
23  Pretty much from the third sexual  
24  massage I had with Jeffrey, all other  
25  messages were sexual.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you recall who was on the  
3 flight home from the first trip?

4           A.       I don't recall who was on  
5 the flight home. I think it was all  
6 the people that were on the first  
7 flight there.

8           Q.       Did you receive any  
9 compensation from Jeffrey during that  
10 first trip?

11          A.       I received like \$300 or  
12 something. Not a lot.

13          Q.       When did you get that?

14          A.       At the end of the trip.

15          Q.       How was it given to you?

16          A.       In cash.

17          Q.       By whom?

18          A.       That specific time it was  
19 Jeffrey.

20          Q.       Where were you when he gave  
21 that you money?

22          A.       I can't recall where I was  
23 when he gave me the cash.

24          Q.       Did -- were you still with  
25 the other females that had been on the



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1                   HIGHLY CONFIDENTIAL AEO

2   plane?

3           A.       When he gave me the cash?

4           Q.       Yes.

5           A.       I can't recall. I don't  
6   remember if someone was with me. But  
7   we all knew that we were going to get  
8   cash.

9           Q.       Did you see him give cash to  
10   anyone else?

11          A.       I saw him give cash to

12   [REDACTED]

13          Q.       How much did he give her, if  
14   you know?

15          A.       I don't know.

16          Q.       Did you see [REDACTED] having  
17   any type of sexual relations with  
18   Jeffrey during the trip?

19          A.       Yes, I did.

20          Q.       When did you see that?

21          A.       I didn't see it in the  
22   bedroom, but we were called on, like,  
23   a rotation visit for Jeffrey  
24   throughout the day and evening.

25          Q.       When did you see [REDACTED]

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1                   HIGHLY CONFIDENTIAL AEO

2       having some type of sexual  
3       relationship with Jeffrey on the  
4       island during the first trip?

5           A.       I didn't see her perform  
6       sexual acts on Jeffrey.

7           Q.       Did anyone see you  
8       performing sexual acts on Jeffrey  
9       during the first trip to the island?

10          A.       No.

11          Q.       Did you tell any of these  
12       other women about what was going on  
13       during your massages with Jeffrey?

14          A.       Yes.

15          Q.       Who did you tell?

16          A.       All the girls that were  
17       there.

18          Q.       And, again, that is [REDACTED]

19       [REDACTED] and [REDACTED]

20                   MR. GUIRGUIS: Objection.

21          Q.       Do you remember?

22          A.       I can't say specifically if  
23       [REDACTED] was there. I can't remember [REDACTED]  
24       being there, so I don't like to bring  
25       [REDACTED] into the first trip.

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1                   HIGHLY CONFIDENTIAL AEO

2                   I saw her multiple times on  
3   the island, but I can't specifically  
4   place her there on the first trip. I  
5   just remember the key people that were  
6   there because they were the most vivid  
7   in my memory.

8           Q.       Do you know if you took any  
9   pictures during that first trip?

10          A.       I don't think during that  
11   first trip, no. We weren't actually  
12   allowed to bring any electronic  
13   devices with us.

14          Q.       How did you learn that rule?

15          A.       ██████ told me and the  
16   other girls told me.

17          Q.       Who are the other girls?

18          A.       ██████

19          Q.       Did you take a camera to the  
20   island?

21          A.       Not the first time, no.

22          Q.       Did you have a digital  
23   camera at the time?

24          A.       Yes, I did.

25          Q.       What kind?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember.

3           Q.       Did you have a phone with a  
4 camera on it?

5           A.       I had a BlackBerry, yes,  
6 which you could take photos on.

7           Q.       All right. Do you recall  
8 there being any sexual acts performed  
9 on the plane on the ride home during  
10 the first trip?

11          A.       No.

12          Q.       Okay. Do you recall going  
13 down a second time?

14          A.       To the island?

15          Q.       Yes.

16          A.       Yes.

17          Q.       When did that happen?

18          A.       Shortly. I can't remember  
19 specifically when it was, but it  
20 wasn't on -- I don't know the time  
21 length. I saw Jeffrey and Ghislaine  
22 and the crowd quite a lot in New York  
23 as well, so it's not clear to me when  
24 the second trip was.

25          Q.       When was the first time you

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1 HIGHLY CONFIDENTIAL AEO

2 met Ghislaine?

3           A.       I'd been to the island a  
4   couple times before, and then I met  
5   Ghislaine on the island.

6 Q. Tell me about your meeting  
7 with her?

8           A.       I remember being told by  
9       everyone before she arrived who she  
10      was. And I was pretty much told the  
11      type of person she was and that I had  
12      to do everything she told me to do.

13 Q. Who told that you?

14           A.       [REDACTED] [REDACTED] [REDACTED] ,  
15       [REDACTED] [REDACTED] Every single girl that  
16       I came in communication with told me  
17       that.

18 Q. And what type of person did  
19 they tell you that she was?

20           A.       She's incredibly  
21   intimidating.  She's not someone you  
22   want to be stuck in an alley at night,  
23   put it that way.  She's a very  
24   dangerous character and has  
25   connections.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And that was communicated to  
3   you by this group of females: [REDACTED]  
4   [REDACTED] [REDACTED] and [REDACTED]

5           A.       Yes.

6           Q.       Anyone else?

7           A.       I mean, it was a general  
8   conversation amongst the girls about  
9   Ghislaine, so there were other girls  
10   all the time. So during the duration  
11   of my stay -- so pretty much from  
12   my -- when I first arrived in New  
13   York, my entire time was spent with  
14   Jeffrey and Ghislaine and that crowd.

15                   So, yeah, it was -- that's  
16   about everything.

17          Q.       Okay. So you met --

18          A.       I met a lot of girls who we  
19   all had the same opinion of Ghislaine;  
20   we were all frightened of her. She  
21   had a very odd relationship with  
22   Jeffrey and -- yeah, she's not a  
23   nice -- I'm sorry, I know she's your  
24   client, but she's not -- she's not a  
25   friendly, warm person.

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1                   HIGHLY CONFIDENTIAL AEO

2                   I liked her dog, though, her  
3   Yorkshire Terrier. Her dog was nice.

4           Q.       You recall meeting her for  
5   the first time on the island?

6           A.       Yeah. She flew in by  
7   helicopter.

8           Q.       And that was after you were  
9   on the island a couple of times?

10          A.       Yeah.

11          Q.       Did she fly the helicopter?

12          A.       I can't remember if she flew  
13   it or not. I just remember her  
14   getting out -- like getting out of  
15   a -- and going Ghislaine, and I was  
16   like -- I was quite frightened when  
17   she arrived, so...

18          Q.       Was she alone or with  
19   someone?

20          A.       I can't remember if she was  
21   with someone. I just remember the  
22   first time I saw her, I was like, is  
23   that it? She didn't look that scary  
24   when I first met her. Looks are  
25   deceiving.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So the first time you saw  
3 her, she was getting off of a  
4 helicopter?

5           A.       Yeah.

6           Q.       And you don't recall if she  
7 flew the helicopter?

8           A.       I don't recall if she flew  
9 it herself or if there was a pilot  
10 there. I just remember she arrived on  
11 a helicopter.

12          Q.       What's the next thing you  
13 remember about your interactions with  
14 her personally?

15          A.       She stayed on the island a  
16 few days, and I didn't have a lot of  
17 interaction with her. I avoided her,  
18 to be honest.

19          Q.       Did you take pictures of  
20 her?

21          A.       No. We weren't allowed any  
22 digital cameras on the island.

23          Q.       Have you ever taken a  
24 picture of her?

25          A.       No. I didn't really feel



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1                   HIGHLY CONFIDENTIAL AEO

2       the need to take pictures of Ghislaine  
3       for my photo album.

4           Q.       Apart from staying away from  
5       her and not having a lot of  
6       interactions, do you recall anything  
7       else about your first interaction with  
8       her on the island?

9           A.       Yeah. She was incredibly  
10      unpleasant to me. She wasn't friendly  
11      or warm.

12          Q.       What did she say or do?

13          A.       She was very dismissive.  
14      Just another girl, really.

15          Q.       Did you ever give her a  
16      massage?

17          A.       No.

18          Q.       Did she ever give you a  
19      massage?

20          A.       She massaged me once or  
21      twice, but it was to -- it was to  
22      refine my technique for Jeffrey.

23          Q.       This was on the first time  
24      you met her?

25          A.       Yeah, during that trip

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1                   HIGHLY CONFIDENTIAL AEO

2       she -- because Jeffrey, again, he's  
3       quite specific on how he likes his  
4       massages and, yeah, I'm not -- that's  
5       not my forte, massages.

6           Q.       How did it come about that  
7       she was helping you to refine your  
8       massage techniques?

9           A.       We were just sitting in the  
10      main area by the big house. That's  
11      where we chilled out. There's a table  
12      there as well.

13                   And, yeah, we were just  
14      sitting on the sofas, and I think -- I  
15      can't remember if I was giving Jeffrey  
16      a massage, but we were all sitting  
17      together, and I think he was getting  
18      massaged by one girl and we were kind  
19      of taking it in turns.

20          Q.       Was it sexual?

21          A.       No, it wasn't sexual. But  
22      Ghislaine was there, and I wasn't  
23      doing it properly and she showed me  
24      how to massage him and how he liked  
25      it.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       What part of his body did  
3 she show you how to massage?

4           A.       His feet, his hands.

5           Q.       Did she say anything to you?

6           A.       I can't remember  
7 specifically what she said to me. She  
8 said a lot of things to me.

9           Q.       Okay. Well, tell me what  
10 you remember she said to you.

11                   MR. GUIRGUIS: Objection.

12           When? Where? What? What are we  
13 talking about?

14           A.       I can't remember  
15 specifically what she said to me. All  
16 I know is that she wasn't -- she  
17 wasn't a particularly nice person, to  
18 me or anybody. So very dictorial  
19 [sic].

20           Q.       Unlimited by time or  
21 anything, do you recall anything  
22 Ghislaine said to you?

23                   MR. GUIRGUIS: Objection.

24           You're asking her --

25           A.       It was how to massage

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1                   HIGHLY CONFIDENTIAL AEO

2     Jeffrey.

3                   I remember speaking to her  
4     quite a lot about my FIT application.

5                   I remember speaking to  
6     Ghislaine about my psychiatrist, about  
7     my weight. My weight was a big issue.  
8     And, in fact, everything was an issue  
9     with Ghislaine.

10           Q.     During this first time you  
11     met her, other than discussing  
12     massages, did those other topics come  
13     up?

14           A.     I can't remember the first  
15     encounter with Ghislaine, but it was  
16     pretty soon after. Everything  
17     snowballed quite quickly.

18           Q.     Well, you saw her getting  
19     off the helicopter, correct?

20           A.     Yeah.

21           Q.     And you saw her on the  
22     island for a couple days that time,  
23     you said, correct?

24           A.     Yeah.

25           Q.     So during that time you saw

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1                   HIGHLY CONFIDENTIAL AEO  
2       her over a couple days, do you  
3       remember any other discussions you had  
4       with her apart from this massage?

5           A.       We spoke about why I was  
6       there, New York. I mean, we -- you  
7       know, she got to know me. She asked  
8       me a lot of questions about my family  
9       life, my -- I mean, she questioned me  
10      a lot on my personal life.

11          Q.       Was anyone else present when  
12      you were having these discussions with  
13      Ghislaine?

14          A.       Yes, everyone. Everyone  
15      that was -- [REDACTED] [REDACTED], Jeffrey,

16      [REDACTED]

17          Q.       Was there anyone different  
18      on this trip?

19          A.       [REDACTED] as well. [REDACTED] was  
20      there.

21          Q.       Anyone else on this trip?

22          A.       I can't remember.

23          Q.       Was [REDACTED] [REDACTED] [REDACTED] there?

24          A.       Not the first time I met  
25      Ghislaine.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Was anyone else there?

3           A.       I can't remember.

4           Q.       Anything that would refresh  
5 your memory?

6           A.       If you could give me the  
7 plane logs or something, or names or  
8 photos. Ten years, as I said, is an  
9 incredibly long time. I don't  
10 remember who -- I mean, it was such a  
11 long time for me.

12                   I came to New York, my  
13 intention was to meet many people,  
14 make new friends, make a new life for  
15 myself. So I didn't really -- I don't  
16 remember names specifically.

17           Q.       Do you remember any  
18 descriptions of other people who were  
19 on the island the first time you met  
20 Ghislaine?

21           A.       They were all beautiful  
22 people. I just remember being  
23 surrounded by beautiful young people.  
24 They were always girls. There were  
25 always girls. You know, girls didn't

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1                   HIGHLY CONFIDENTIAL AEO  
2       even have time to kind of remember  
3       girls' names because there was always  
4       people leaving the island, popping in,  
5       flying in. So there was a constant  
6       flux of people coming in, popping in  
7       visiting Jeffrey and Ghislaine.

8           Q.       So the first time you met  
9       Ghislaine, you saw her get off a  
10      helicopter. She was on the island for  
11      a couple days.

12                   Any other females you  
13      remember being there on that occasion?

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

16           A.       [REDACTED]  
17      [REDACTED] and I can't remember any  
18      others.

19           Q.       Can you remember any  
20      descriptions of other people who were  
21      there on that occasion?

22                   MR. GUIRGUIS: Objection,  
23      asked and answered.

24           A.       They were just pretty. They  
25      were just beautiful.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Hair color?

3                   MR. GUIRGUIS:   Objection.

4           A.       Normal.

5           Q.       Height?

6           A.       I don't recall height.

7           Q.       Any other physical  
8 characteristics at all?

9                   MR. GUIRGUIS:   Objection.

10          A.       Just that they were  
11 extremely beautiful.   I've never seen  
12 girls like this.

13          Q.       Well, you had been a model  
14 in London, right?

15          A.       Yeah, I have, but, you know,  
16 Jeffrey Epstein, he acquired the  
17 elite, didn't he, you know, him and  
18 Ghislaine.   So they were pretty much  
19 the crème de la crème of the crop, I  
20 would say, the girls that were around  
21 him.

22          Q.       On this first occasion when  
23 you met Ghislaine and there were  
24 beautiful girls, who you don't recall  
25 what they look like; you recall they



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1                   HIGHLY CONFIDENTIAL AEO

2       were beautiful?

3           A.       Yeah, there were beautiful  
4       people constantly surrounded by  
5       Jeffrey Epstein and Ghislaine. They  
6       were only surrounded by beautiful  
7       people, beautiful girls.

8           Q.       But apart from that, you  
9       don't have any other specifics?

10          A.       I don't recall the  
11       appearance of the other girls. I  
12       don't -- as I will say again, there  
13       was a constant stream of people coming  
14       in, going off the island, popping in,  
15       popping out, girls flying in, girls  
16       flying out. There were girls on the  
17       island that were there shorter time  
18       frames than me and flew out.

19                   I didn't really -- I hung  
20       out with my crew: [REDACTED] [REDACTED] They  
21       were -- they were my friends. I  
22       thought they were my friends. So I  
23       didn't really cozy up to any of the  
24       other girls.

25                   It's like high school, you

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1                   HIGHLY CONFIDENTIAL AEO  
2       know, you're not friends with  
3       everybody. You ask me who -- everyone  
4       I went to school with, I don't  
5       remember. I don't have a clue. I  
6       don't know who they are.

7           Q.       Do you have a best friend  
8       from school?

9                   MR. GUIRGUIS: Objection.

10          A.       Several. Several. I mean,  
11       who has any best friend at school?  
12       School's school. We don't make best  
13       friends at school.

14          Q.       Who is [REDACTED]

15          A.       She was an acquaintance that  
16       I met in New York.

17          Q.       Where did you meet her?

18          A.       I think I met her at a bar  
19       or something.

20          Q.       Was she a friend of yours  
21       during this time period?

22          A.       She was an acquaintance. I  
23       would say friend is -- yeah, I  
24       wouldn't say friend. I'd say  
25       acquaintance.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So on this occasion where  
3   you met Ghislaine on the island and  
4   you spoke to her about massage, did  
5   you ever have any other sexual-type  
6   interactions with her?

7                   MS. MCCAWLEY: I didn't hear  
8       the end of that. Did you say  
9       "him"?

10          Q.       Sexual-type interactions  
11   with her?

12          A.       With her?

13          Q.       Ghislaine?

14          A.       No.

15          Q.       And do you recall if she  
16   flew with you back on the plane?

17          A.       I can't remember.

18          Q.       What's the next time you  
19   went to the island?

20          A.       Again, I don't remember  
21   specifically. I went various several  
22   times during the duration. So I  
23   remember there was a -- it was several  
24   times. I can't remember the next time  
25   I went to the island. I mean, it's...

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Was it before you went back  
3 to South Africa to visit?

4           A.       Yes.

5           Q.       All the visits to the island  
6 were before that?

7                   MS. MCCAWLEY: Objection.

8           A.       Yeah.

9           Q.       What's the next time you  
10 remember meeting Ghislaine?

11          A.       I met her at the office in  
12 New York.

13          Q.       What's the office?

14          A.       Jeffrey's office, main  
15 office.

16          Q.       Where is that?

17          A.       I don't remember the  
18 location. It's central. It's got a  
19 courtyard. Like when you walk in,  
20 there's like a courtyard.

21          Q.       What were you doing at  
22 Jeffrey's office in New York?

23          A.       We were preparing for my  
24 college application. Jeffrey often  
25 wanted to see just how I was doing, so

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1                   HIGHLY CONFIDENTIAL AEO

2       I had to regularly pop in to see him  
3       and Ghislaine. And Ghislaine would  
4       often check how I was doing and blah,  
5       blah, blah, etcetera.

6           Q.       What were you doing to  
7       prepare for your college application?

8           A.       I had to write an essay.

9           Q.       When did you --

10          A.       Also, I had to do -- like,  
11       you know how you apply for college  
12       applications; you've got your  
13       application forms and such. So it was  
14       more admin.

15          Q.       And you were going to  
16       Jeffrey's office to work on your  
17       forms?

18          A.       Yes. And to just say hi. I  
19       was -- well, I never went on my own  
20       accord. I was either invited or told  
21       to be there by either Ghislaine or  
22       Jeffrey. I also went to the offices  
23       on a number of occasions for private  
24       legal matter.

25          Q.       What's the private legal

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1                   HIGHLY CONFIDENTIAL AEO

2       matter?

3                   MR. GUIRGUIS:   Objection.

4           I'm going to direct you not to  
5       answer if it's unrelated to this  
6       case.

7       Q.       Was there an attorney  
8       present?

9       A.       Yes.

10       Q.       What was the name of the  
11       attorney who was present?

12       A.       Alan Dershowitz.

13       Q.       So I was asking about the  
14       second time you met Ghislaine.   It was  
15       at Jeffrey's office in New York?

16       A.       Yes.

17       Q.       How did you come to be in  
18       Jeffrey's office in New York where you  
19       met Ghislaine the second time?

20       A.       I was told to be there.

21       Q.       Who told you to be there?

22       A.       I think it was Ghislaine.

23       Q.       How did Ghislaine tell you  
24       to be there?

25       A.       I can't remember if it was

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1                   HIGHLY CONFIDENTIAL AEO  
2       via telephone call. I can't remember  
3       the exact communication that she used.  
4       But I was told to regularly be there  
5       when they wanted me there, and just  
6       grabbed a taxi and arrived at the  
7       office.

8           Q.       Well, I'm asking you about  
9       the second time.

10                   So you met her on the  
11       island, and the next thing you know,  
12       you have a communication from her in  
13       New York?

14           A.       Well, she was always with  
15       Jeffrey in his office, so it's like --  
16       okay, so let me explain it.

17                   So you go to an office and  
18       you see Jeffrey's office there and  
19       Ghislaine -- Ghislaine was always at  
20       Jeffrey's office, so I think she had  
21       her own office there.

22                   So when you walk in and  
23       you've met people before, you kind of  
24       say hi to everyone. You know, you  
25       have a little chitchat.

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1                   HIGHLY CONFIDENTIAL AEO

2                   Do you understand? You  
3 don't -- you don't -- you know, I  
4 chatted with Ghislaine, I chatted with  
5 Jeffrey. It was a busy office. I  
6 can't remember specifically what was  
7 said. It was just a check-in, kind  
8 of.

9           Q.       So you were going there to  
10 work on your college application, and  
11 you happened to see Ghislaine in the  
12 offices?

13                   MS. MCCAWLEY: Objection.

14           A.       She -- you know, she  
15 participated in the -- you know, a  
16 lot. She was interested in me. I  
17 was -- you know, she interacted with  
18 me.

19           Q.       I know. I'm trying to  
20 understand when you did this. When  
21 was it?

22           A.       It was the second time, the  
23 first time I went to the office.

24           Q.       The first time you went to  
25 the office, the second time you met



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1                   HIGHLY CONFIDENTIAL AEO

2       Ghislaine?

3           A.       Yes.

4           Q.       And when was it relative to  
5       the first time you met Ghislaine?

6           A.       I can't remember if it was a  
7       couple of weeks later. I don't  
8       remember the exact time frame of how  
9       many days or weeks there was between  
10      the first trip and the -- when I went  
11      in to the office.

12          Q.       But you do recall going into  
13      the office to work on your college  
14      application?

15                   MS. MCCAWLEY: Objection.

16          A.       Yes. Well, I went in a  
17      number of times to the office. So,  
18      like, we regularly had to report to  
19      Jeffrey in the office. It was a -- we  
20      were called all the time there.

21          Q.       What do you mean, you had to  
22      report there?

23          A.       Well, Jeffrey liked to check  
24      in with all of us.

25          Q.       How was it communicated to

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1                   HIGHLY CONFIDENTIAL AEO

2       you that you needed to report to the  
3       office?

4           A.       Jeffrey. I was just told to  
5       be there; I had to be there.

6           Q.       Who told that you?

7           A.       Jeffrey and Ghislaine.

8           Q.       Anyone else?

9           A.       [REDACTED] [REDACTED] and [REDACTED]  
10       [REDACTED]

11          Q.       How did they communicate it  
12       to you?

13          A.       By telephonic call.

14          Q.       To your cell phone?

15          A.       And BlackBerry, which they  
16       provided me.

17          Q.       So you did not have a  
18       BlackBerry before you met Jeffrey?

19          A.       No.

20          Q.       Then you got a BlackBerry  
21       when you were --

22          A.       That's correct.

23          Q.       -- acquainted with him.

24                   And what happened with the  
25       phone you had before?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       It's got lost through  
3 translation. I have moved several  
4 times through the years, so...

5           Q.       So you got messages or phone  
6 calls?

7           A.       BBMs, phone calls, text  
8 messages.

9                   All the emails that they  
10 sent me, I think you guys have. There  
11 wasn't a lot of email correspondence.  
12 The majority of it was done by phone  
13 call.

14          Q.       Did you have any emails with  
15 Ghislaine?

16          A.       No, no email correspondence  
17 with Ghislaine.

18          Q.       Did you have her phone  
19 number?

20          A.       I did at the time, yeah.

21          Q.       Do you remember what it was?

22          A.       No.

23          Q.       Do you remember what your  
24 number was?

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Objection,  
3           asked and answered.

4           Q.       Tell me about any  
5   conversations you had with Ghislaine  
6   that involved FIT.

7                   MR. GUIRGUIS: Objection,  
8           form.

9           A.       I can't remember the  
10   specific conversation. There were  
11   many conversations. I was just  
12   applying -- doing an application form.  
13   And they were trying to get me in.  
14   They -- yeah, I can't remember the  
15   exact -- I think Ghislaine also knew  
16   people there, so they were basically  
17   trying to get me into FIT.

18          Q.       Well, tell me what you  
19   recall Ghislaine saying versus they?

20          A.       I can't remember  
21   specifically the conversation, so I  
22   would not like to speculate. But I  
23   will give you the overall conversation  
24   was regarding my FIT application, but  
25   I cannot remember the specific content

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1                   HIGHLY CONFIDENTIAL AEO

2       or the specific words used.

3                   But it was surrounding my  
4       FIT application and an essay I had to  
5       write, and they both proofread my FIT  
6       application as well.

7           Q.       And did they both read your  
8       essay?

9           A.       Yes, they did.

10          Q.       When did you write that  
11       essay?

12          A.       I can't remember.

13          Q.       Before you went to South  
14       Africa?

15          A.       Yes.

16          Q.       Do you know what the  
17       application deadline was?

18          A.       I don't know. I don't know.  
19       I can't remember.

20          Q.       When did you meet Alan  
21       Dershowitz?

22          A.       I don't remember the  
23       specific date. It was a few months  
24       after I had been here in New York.

25          Q.       Was it after you had gone to

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1                   HIGHLY CONFIDENTIAL AEO

2    the island?

3           A.       Yes.

4           Q.       Do you know what time of  
5   year?

6           A.       I mean, I think it was  
7   before winter.

8           Q.       Well, you were here in the  
9   fall.

10          A.       Yeah.

11          Q.       And you left in the winter?

12          A.       Yeah. I left in May.

13          Q.       So did you meet him before  
14   you went to South Africa?

15          A.       Yes.

16          Q.       Well, let's be clear. You  
17   were here until you went to South  
18   Africa, and you left for a while and  
19   then you came back, right?

20          A.       Mm-hmm.

21          Q.       How long were you gone?

22          A.       I think about three -- about  
23   three weeks.

24          Q.       So you met him before you  
25   went to South Africa?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.

3           Q.       And tell me about when you  
4 met Alan.

5           A.       I first met Alan at the  
6 offices.

7           Q.       And tell me what happened.

8           A.       I can't really tell you what  
9 happened, because it's about a legal  
10 matter.

11          Q.       Was he your lawyer?

12          A.       He was going to be assigned  
13 to be my lawyer.

14          Q.       Assigned to be your lawyer?

15          A.       Through Jeffrey's  
16 instruction.

17          Q.       Okay. Was he your lawyer?

18                   MS. MCCAWLEY: Objection,  
19 asked and answered.

20                   MS. MENNINGER: I don't know  
21 if there's a privilege.

22                   MR. GUIRGUIS: There's a  
23 privilege whether he was retained  
24 or not, right? I mean, if you're  
25 at a cocktail party and you speak

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1                   HIGHLY CONFIDENTIAL AEO  
2           to a lawyer, you know that  
3           conversation is privileged.  
4           So...

5                   MS. MENNINGER:   Well, I  
6           don't, actually.

7                   MR. GUIRGUIS:   You're free  
8           to research it.

9                   MS. MENNINGER:   I will ask  
10          questions, then, to try to  
11          establish whether or not there's  
12          a good-faith basis.

13          Q.       Did you approach Alan  
14   Dershowitz for the purpose of seeking  
15   legal advice?

16          A.       I was introduced to Alan.

17          Q.       By whom?

18          A.       Jeffrey Epstein.

19          Q.       On what day?

20          A.       I don't recall what day.

21          Q.       Was it related to some event  
22   that had occurred just before that?

23          A.       Yes, that's correct.

24          Q.       Were you in touch with any  
25   law enforcement authorities?



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Hmm?

4           A.       No.

5           Q.       Was Jeffrey Epstein in the  
6 room when you were speaking with Alan  
7 Dershowitz?

8           A.       Yes.

9           Q.       Did Jeffrey Epstein overhear  
10 your conversation with Alan  
11 Dershowitz?

12          A.       Yes.

13          Q.       What did you talk about with  
14 Alan Dershowitz?

15                   MR. GUIRGUIS: Objection.

16          A.       It --

17                   MR. GUIRGUIS: Objection. I  
18 direct the witness not to answer.

19                   MS. MENNINGER: A third  
20 party was in the room; you've  
21 heard that, Counsel. And you  
22 know that means that's a waiver.

23                   MS. MCCAWLEY: No. I mean,  
24 they would have been involved --  
25 we don't know what the situation

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1                   HIGHLY CONFIDENTIAL AEO

2           is. They could have been  
3           involved together. There could  
4           be a number of reasons why  
5           Jeffrey had some sort of common  
6           interest with her with that.

7           Q. Did you sign a common  
8           interest agreement with Jeffrey?

9                   MR. GUIRGUIS: Objection.  
10          Do not answer.

11                  MS. MENNINGER: Whether she  
12          had a common interest agreement  
13          with Jeffrey, you're instructing  
14          her not to answer; is that right,  
15          Counsel?

16                  MR. GUIRGUIS: Do you have  
17          realtime in front of you,  
18          Counsel?

19                  MS. MENNINGER: I don't.

20                  MR. GUIRGUIS: You don't?  
21          You can borrow mine.

22                  MS. MENNINGER: I don't want  
23          it. Thank you.

24                  MR. GUIRGUIS: Okay.

25          Q. Anyone else in the room when

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1                   HIGHLY CONFIDENTIAL AEO

2       you spoke with Mr. Dershowitz?

3           A.       No.

4           Q.       Describe Mr. Dershowitz for  
5       me.

6           A.       He -- old age; white, pasty  
7       skin; not very attractive. Wears  
8       glasses. Bit of an ugly man, really.

9           Q.       Did he have any facial hair?

10          A.       I can't recall at that time,  
11       no.

12          Q.       Mustache?

13          A.       I can't remember.

14          Q.       Beard?

15          A.       I can't remember.

16          Q.       You can't remember if he had  
17       a mustache or a beard?

18                   MR. GUIRGUIS: Objection,  
19       asked and answered.

20                   MS. MCCAWLEY: Objection.

21          A.       I don't recall seeing a  
22       massage -- sorry, a mustache on Alan  
23       Dershowitz. I don't recall a massive  
24       amount of facial hair. I recall Alan  
25       Dershowitz. Whether he had stubble or

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1                   HIGHLY CONFIDENTIAL AEO

2       not, I'm -- yeah, it's -- he didn't  
3       have a beard, I don't think.

4           Q.       All right. Did you sign an  
5       affidavit that you submitted in this  
6       case?

7           A.       Yes.

8           Q.       Did you make the allegation  
9       in your declaration that you had a  
10      sexual relationship with Alan  
11      Dershowitz?

12          A.       Yes, I absolutely did.

13          Q.       When did you have sex with  
14      Alan Dershowitz?

15          A.       I can't remember the exact  
16      time, but it was in Jeffrey's New York  
17      apartment.

18          Q.       Where in the apartment?

19          A.       It was in a bathroom. I  
20      can't remember.

21          Q.       Was it before or after you  
22      had this conversation that you won't  
23      describe?

24          A.       It was after.

25          Q.       So do you recall what month

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1                   HIGHLY CONFIDENTIAL AEO

2       that was? Before you went to South  
3       Africa or after you went to South  
4       Africa?

5           A.       I can't remember.

6           Q.       How long did you speak to  
7       Alan Dershowitz during your first  
8       meeting with him?

9           A.       Until I was finished  
10       explaining what my legal matter was.

11          Q.       Did he believe you to be --  
12       did he believe that he was your lawyer  
13       during that conversation?

14                   MR. GUIRGUIS: Objection.

15                   MS. MCCAWLEY: Objection.

16                   MR. POTTINGER: Please.

17                   MR. PAGLIUCA: All right,  
18       guys. You know, let's just do  
19       the deposition here without the  
20       chorus over there.

21                   MR. GUIRGUIS: And without  
22       the speeches as well.

23                   We agree, let's carry on  
24       without asking ridiculous  
25       questions about what other

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1                   HIGHLY CONFIDENTIAL AEO

2           people's mental state was. I  
3           think that's a good idea. Let's  
4           carry on.

5                   Counsel?

6           Q.       Did you ever sign a fee  
7           agreement with Alan Dershowitz?

8           A.       No.

9           Q.       Did you ever appear in court  
10          with Alan Dershowitz?

11          A.       No.

12          Q.       Did you ever appear in court  
13          yourself?

14          A.       No.

15          Q.       Did you ever have any  
16          contact with any law enforcement  
17          officers while you were in New York?

18          A.       No.

19          Q.       Any police?

20          A.       No.

21          Q.       After you left that meeting  
22          with Alan Dershowitz, when did you see  
23          him next?

24          A.       I can't remember. I think  
25          it was at dinner. There was a dinner,

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1                   HIGHLY CONFIDENTIAL AEO

2       yeah.

3           Q.       And do you know whether the  
4       dinner was before or after you went to  
5       South Africa?

6           A.       I can't remember the  
7       specific time period, so I don't  
8       remember if it was before or after.  
9       But it was --

10          Q.       Where was the dinner?

11          A.       It was in a restaurant in  
12       New York.

13          Q.       What restaurant?

14          A.       I can't remember.

15          Q.       Who else was there?

16          A.       I remember Alan, Jeffrey,  
17       myself. And I can't remember if  
18       others -- if there were other people  
19       there.

20          Q.       What type of restaurant was  
21       it?

22          A.       It was a nice restaurant.

23          Q.       Do you remember the type of  
24       cuisine?

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       When was the next time --  
3 what do you remember discussing that  
4 dinner?

5           A.       The legal matter I had.

6           Q.       Did you consider him to be  
7 your lawyer at that dinner?

8           A.       Yes, I did.

9           Q.       What's the next time that  
10 you saw Alan Dershowitz?

11          A.       At Jeffrey's New York  
12 mansion.

13          Q.       When was that?

14          A.       It was after the second time  
15 I had met Alan.

16          Q.       Had you been to South  
17 Africa?

18          A.       I can't remember.

19          Q.       Tell me what happened during  
20 that encounter.

21          A.       I walked in the room -- I  
22 walked in the house. Jeffrey and  
23 [REDACTED] and Alan were there.

24          Q.       What happened after you  
25 walked in the house?



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1 HIGHLY CONFIDENTIAL AEO

2 A. I -- it was really strange,  
3 because [REDACTED] didn't like me. And so  
4 when I arrived, we had -- I think -- I  
5 can't remember if I had, like, water  
6 or whatever.

7 [REDACTED] took me upstairs. I  
8 remember there was a room. I didn't  
9 quite understand what was going on at  
10 the time. I knew obviously something  
11 was going on, because I never met  
12 [REDACTED] socially.

13 So [REDACTED] started undressing  
14 me in the room. She started  
15 undressing me by the bed. We got on  
16 the bed. I kind of knew what was  
17 going on from that. The girls were  
18 often forced to have sex with each  
19 other for Jeffrey's pleasure, so it  
20 was just another occasion, I guess.

21 Jeffrey then walked in the  
22 room. He started masturbating under  
23 his clothes. He put his hand in his  
24 trousers. A few minutes later Alan  
25 walked in the room. He started

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1                   HIGHLY CONFIDENTIAL AEO  
2       undressing, he got on the bed with  
3       [REDACTED] and myself, and we basically had  
4       a three-way sexual interaction.

5           Q.       Was Alan fully unclothed?

6           A.       During -- when? At what  
7       specific -- he walked in with clothes.

8           Q.       And he got fully undressed?

9           A.       Yes.

10          Q.       So you saw his entire naked  
11       body?

12          A.       Yes.

13          Q.       Did you notice anything  
14       specific about his body?

15          A.       Not that I recall. I mean  
16       -- yeah, not that I -- I can't really  
17       remember. It was quite a -- it was  
18       a -- it wasn't a pleasant experience.

19          Q.       What did you do with Alan?

20          A.       I gave him oral sex,  
21       masturbated him.

22          Q.       Anything else?

23          A.       He did the same with [REDACTED]  
24       He performed the same on me.

25          Q.       Did he ejaculate?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       He did, yeah.

3           Q.       In your mouth?

4           A.       No.

5           Q.       Did you have intercourse  
6 with him?

7           A.       No, not penetration, no.

8           Q.       Did you see him ejaculate  
9 more than once?

10          A.       No, I didn't see him  
11 ejaculate more than once.

12          Q.       You didn't notice any scars?

13                   MS. MCCAWLEY: Objection.

14          A.       I don't recall specific  
15 markings on every man I've been with  
16 body. So it's not something -- I  
17 wasn't ravishing Alan's body. I was  
18 trying to close my eyes and just get  
19 it done so I could go home and watch  
20 TV, really. So I wasn't really aware.

21                   I didn't really like kind of  
22 go, woo, his body. I don't -- I don't  
23 recall his body at all. Like, I don't  
24 make a mental note of every man's body  
25 I've slept with.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Other than Jeffrey, is that  
3   the first time you had sex with  
4   another man in his home or on his  
5   property?

6           A.       Sorry, can you just repeat  
7   the question.

8                   MR. GUIRGUIS:   Or rephrase  
9   it.

10                  THE WITNESS:   I'll just read  
11   it.

12                  MR. GUIRGUIS:   If you  
13   understand it.

14           A.       Yeah, he was the only  
15   person, Alan Dershowitz.

16           Q.       Did you have sex with him  
17   more than once?

18           A.       No.

19           Q.       At the occasion you just  
20   described, did he have an erection?

21           A.       It was -- it was -- it  
22   wasn't particularly hard.   It was  
23   pretty disappointing.

24           Q.       And where did he ejaculate?

25           A.       I had given him oral sex

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1                   HIGHLY CONFIDENTIAL AEO

2     and, well, he ejaculated -- he  
3     ejaculated. I mean, there's only so  
4     many places a man can ejaculate. He  
5     didn't ejaculate on me.

6                   He didn't ejaculate in my  
7     mouth. I gave him oral and I  
8     masturbated him and finished him off.  
9     He ejaculated over himself, me.  
10    Just -- there wasn't a lot of  
11    ejaculation. I don't remember a lot  
12    of sperm. I didn't see massive  
13    amounts of semen. But I just remember  
14    him ejaculating, but it wasn't in my  
15    mouth.

16           Q.     And in terms of time frame,  
17    the best you can say is this is after  
18    you had been to the island a few  
19    times?

20           A.     That's correct.

21           Q.     And you don't remember if it  
22    was before or after you went to South  
23    Africa?

24           A.     I can't remember  
25    specifically, no.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you see Alan Dershowitz  
3   again after that one occasion?

4           A.       No.

5           Q.       So you saw him at the  
6   office, you say saw him at dinner, and  
7   you saw him that one time in the  
8   bedroom at Jeffrey's house?

9           A.       That's correct.

10                  MS. MENNINGER:   It's 1:00.

11                 I think we should take a small  
12                 lunch break.

13                         (Time noted:   1:01 p.m.)

14                         (Luncheon recess.)

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1                   HIGHLY CONFIDENTIAL AEO

2                   A F T E R N O O N   S E S S I O N

3                   (Time noted:   1:54 p.m.)

4                   MR. GUIRGUIS:   Counsel,

5                   before you commence with your

6                   questioning, I think there's one

7                   issue from this morning that the

8                   witness wants to correct herself

9                   on, so just let her do that now.

10                  THE WITNESS:   I said earlier

11                  that I would just like to correct

12                  that my lawyers are paying for --

13                  they are covering my hotel

14                  expense.

15                  MS. MENNINGER:   Thank you

16                  for that clarification.

17                  THE WITNESS:   And --

18                  MR. GUIRGUIS:   Go ahead.

19                  THE WITNESS:   And my flight.

20                  MS. MENNINGER:   Thank you.

21                  SARAH RANSOME, RESUMED,

22                  having been previously and duly

23                  sworn, was examined and testified

24                  further, as follows:

25                  CONTINUED EXAMINATION

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1                   HIGHLY CONFIDENTIAL AEO

2                   BY MS. MENNINGER:

3           Q.       Going back to your first  
4 conversation with Alan Dershowitz, at  
5 any point in that conversation, had  
6 Mr. Dershowitz agreed to act as your  
7 lawyer?

8           A.       Yes.

9           Q.       Did he do anything in terms  
10 of contacting anyone on your behalf?

11                  MR. GUIRGUIS: Objection.

12                  Do not answer.

13          Q.       What was the specific legal  
14 matter that you were seeking  
15 representation for?

16                  MS. MCCAWLEY: Objection.

17                  MR. GUIRGUIS: Objection.

18                  Do not answer.

19          Q.       What did you understand the  
20 purpose of Jeffrey Epstein being in  
21 the room for during that conversation?

22          A.       Jeffrey was there to support  
23 me and Jeffrey was looking after me.

24          Q.       When you engaged in sexual  
25 conduct with Alan Dershowitz, did you



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1                   HIGHLY CONFIDENTIAL AEO

2       see any evidence on his body of his  
3       surgical procedure?

4           A.       I don't recall seeing  
5       anything. I can't remember.

6           Q.       Did you see any bandages?

7           A.       I can't remember.

8           Q.       Did you see him bleed  
9       through his penis?

10          A.       Not that I recall.

11          Q.       Do you recall seeing  
12       Mr. Dershowitz bleed through his  
13       penis?

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

16          A.       Not that I recall.

17          Q.       When you were on the island,  
18       sometime less than ten times, you  
19       think, did you ever use any drugs?

20          A.       No.

21          Q.       Did you use cocaine?

22          A.       No.

23          Q.       Did you ever get thrown off  
24       the island for using cocaine?

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you drink alcohol?

3           A.       No.

4           Q.       None?

5           A.       During on the island,  
6 whenever I was around Jeffrey,  
7 absolutely not.

8           Q.       Other than going to the  
9 island, did you travel with Jeffrey  
10 anywhere else?

11          A.       No.

12          Q.       Did you ever travel anywhere  
13 with Ghislaine Maxwell?

14          A.       No.

15          Q.       Did you ever fly on an  
16 airplane with Ghislaine Maxwell?

17          A.       I don't -- I don't remember.

18          Q.       You don't remember any time  
19 you flew on a plane with Ghislaine  
20 Maxwell?

21          A.       No, I don't remember. There  
22 were always many people on the plane.

23          Q.       When you refer to the plane,  
24 you're referring to a private plane?

25          A.       Jeffrey's plane, yes.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you travel on more than  
3 one plane of Jeffrey's?

4           A.       Not that I -- no, I don't  
5 remember. I don't remember.

6           Q.       Can you visualize in your  
7 head any other layout of a different  
8 type of plane than the one you drew in  
9 Defendant's Exhibit 1?

10          A.       No.

11          Q.       Why did you go to South  
12 Africa in early 2007?

13          A.       To visit my family.

14          Q.       And which family members did  
15 you visit?

16          A.       My father and my stepmother.

17          Q.       Anyone else?

18          A.       No.

19          Q.       Any siblings?

20          A.       My younger brother and  
21 sister lived with my parents; my dad  
22 and my stepmom and their two younger  
23 children.

24          Q.       Did you see any school  
25 friends there?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Who paid for your plane  
4 ticket to go to South Africa?

5           A.       Jeffrey did.

6           Q.       How did that come about?

7           A.       I wanted to see my family,  
8 and he funded the plane ticket because  
9 he was funding everything else at that  
10 time.

11          Q.       What else was he funding at  
12 that time?

13          A.       Accommodation, travel,  
14 taxis, food, my prescription that I  
15 had to pay for, for the prescription  
16 that -- prescription drugs.

17          Q.       Had you taken any  
18 prescriptions for mental health  
19 disorders before October 2006?

20          A.       No.

21          Q.       Have you taken any since May  
22 of 2007?

23          A.       Yes, I have.

24          Q.       Which ones?

25          A.       Paroxetine.



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1

HIGHLY CONFIDENTIAL AEO

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[illegible]

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1                   HIGHLY CONFIDENTIAL AEO

2       I had been prescribed were incorrect.

3           Q.       Those are the ones you  
4       mentioned earlier in your testimony?

5           A.       Yeah. I had to stop and  
6       change medication, because I was first  
7       started on lithium. The lithium made  
8       me put on weight at quite a rapid  
9       rate, so I was put on so many  
10      different types of medication because  
11      I didn't -- not every one agrees with  
12      you. Weight was a massive issue for  
13      Ghislaine and Jeffrey, so the lithium  
14      just didn't work for me. I mean, I  
15      put on weight quite quickly.

16          Q.       What did Ghislaine Maxwell  
17      say to you about weight?

18          A.       Well, what did she not say?  
19      She bullied me massively about my  
20      weight.

21          Q.       What did see say?

22          A.       I was told that I would lose  
23      Jeffrey's financing if I didn't lose  
24      weight, and I would not -- they would  
25      not help me get into FIT.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who were you told that by?

3 A. Ghislaine and Jeffrey.

4 Q. In the same conversation?

5 A. Various conversations.

6 Q. Tell me your conversations  
7 with Ghislaine. When did she say that  
8 to you?

9 A. On the island.

10 Q. Before you went to South  
11 Africa?

12 A. Yes.

13 Q. And was that in person?

14 A. Yes.

15 Q. Who else was present?

16 A. [REDACTED], a girl  
17 named [REDACTED] and a girl named [REDACTED]  
18 Sorry, I just remembered a name. A  
19 girl named [REDACTED] and a girl named  
20 [REDACTED]

21 Q. So they were all present  
22 when you had a discussion with  
23 Ghislaine about your weight on the  
24 island?

25 A. Yes.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And what did Ghislaine say  
3   to you about your weight when you were  
4   on the island in front of all these  
5   people?

6           A.       I can't remember the  
7   specific conversation, how it went.  
8   We got into an argument about my  
9   weight, quite a heated argument.

10          Q.       What do you recall about the  
11   argument?

12          A.       I recall it got so heated  
13   that I ran off and tried to swim off  
14   the island. I wanted to get as far  
15   away from Jeffrey and Ghislaine as  
16   possible.

17          Q.       Okay. And then what  
18   happened?

19          A.       I left the main house. I  
20   took -- there's like a buggy thing.  
21   It was evening. I drove to a  
22   particular spot on the island. It was  
23   -- so Jeffrey's island is quite rocky  
24   around the edges, so -- and it's not  
25   really -- you can't just go into the

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1                   HIGHLY CONFIDENTIAL AEO  
2       water. It was quite steep. And,  
3       well, I didn't really know how to swim  
4       away. I didn't know how to escape.  
5       But I wanted to, at that precise  
6       moment, get as far as away from him as  
7       possible.

8           Q.       So you had a heated argument  
9       about your weight with Ghislaine?

10          A.       Ghislaine and Jeffrey.

11          Q.       They were both there?

12          A.       Yes.

13          Q.       And do you remember anything  
14       that was said during that argument?

15          A.       It was basically an  
16       ultimatum that I either lose weight  
17       or -- or that's it.

18                   THE WITNESS: Sorry, can I  
19       -- sorry. I need to get a  
20       headache tablet, if you don't  
21       mind.

22                   MS. MENNINGER: Go off the  
23       record for a second.

24                   (An off-the-record  
25       discussion was held.)

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1                   HIGHLY CONFIDENTIAL AEO

2                   MS. MENNINGER: Go back on.

3           Q.       You were given an ultimatum  
4 to lose weight or what?

5           A.       They wouldn't help me to get  
6 into FIT, and that my time with  
7 Jeffrey would be -- would end.

8           Q.       Who said what?

9           A.       Well, they both -- they both  
10 said it in so many words. I can't  
11 remember the exact conversation. I  
12 remember it being heated. I remember  
13 them giving me the ultimatum. I think  
14 a few curse words were shared. I  
15 can't -- it was a very heated  
16 conversation. I can't remember the  
17 exact words.

18          Q.       Was [REDACTED] there?

19          A.       No, I don't recall her being  
20 there.

21          Q.       Were you taking the  
22 medications that you talked about  
23 earlier during this time period?

24          A.       Yes.

25          Q.       Had you put on weight since

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1                   HIGHLY CONFIDENTIAL AEO

2       taking those medications?

3           A.       Yes, I had. And I had also  
4       put on weight because I wasn't allowed  
5       to smoke any cigarettes at all, with  
6       Jeffrey on the island or anywhere near  
7       Jeffrey. Jeffrey wasn't allowed to  
8       know that we smoked.

9                   So I put on also a lot of  
10      weight as well, in conjunction with  
11      the lithium. So yeah.

12      Q.       How did the topic of your  
13      weight come up?

14      A.       Well, I wasn't as skinny as  
15      the other girls, and Jeffrey liked his  
16      girls very thin.

17      Q.       Were you interested in  
18      modeling at that point in time?

19      A.       I was doing freelance  
20      modeling at the time, but I mean, I  
21      wasn't exactly going to be a Kate  
22      Moss. And the modeling agency thought  
23      I wasn't petite enough for them  
24      either.

25                   I would like to clarify I

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1                   HIGHLY CONFIDENTIAL AEO

2       wasn't actually fat; I was normal  
3       weight, by the way, just to make that  
4       clear. I am 64, 65 kilograms at that  
5       time.

6           Q.       Why did you understand that  
7       Jeffrey and Ghislaine wanted you to  
8       lose weight?

9           A.       I was one of the girls that  
10       Jeffrey had sexual encounters with  
11       regularly. He liked his girls thin.

12          Q.       Did you ask Jeffrey to help  
13       you become a model?

14          A.       No. I wanted to get a  
15       degree and an education.

16          Q.       So you were not attempting  
17       to become a model at that point in  
18       time?

19          A.       No. I wanted to get an  
20       education as opposed to being a model.

21          Q.       Did you talk to [REDACTED] [REDACTED]  
22       [REDACTED] about becoming a model?

23          A.       I -- as I was freelancing  
24       during that time, or trying to get  
25       freelancing work, Jeffrey kept us on a

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1                   HIGHLY CONFIDENTIAL AEO  
2     little string with his massage  
3     payments, so I wanted to earn a  
4     separate income while I was doing my  
5     education to fund my living expenses.  
6     So, you know, I wanted to potentially  
7     increase my jobs.

8                   But no, my job was not to be  
9     a high-fashion model. I wanted to get  
10    my degree, get my education and work  
11    in the fashion industry.

12           Q.     You had worked as a model  
13    during college earlier, correct?

14           A.     Yes.

15           Q.     And you saved up money from  
16    that job, correct?

17           A.     Yes.

18           Q.     And you had used that money  
19    to fly to New York at some point,  
20    correct?

21           A.     Yes.

22           Q.     And what you're saying now  
23    is you would also potentially do  
24    modeling while you were studying in  
25    the future?

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Objection.

3                   That's not at all what she's  
4                   saying.

5                   A.       As in future, as in would I  
6                   do modeling now?

7                   Q.       No. I'll rephrase the  
8                   question.

9                   A.       Please.

10                  MS. MENNINGER: Let's take a  
11                  break, go off the record. And  
12                  when you finish the salad, we'll  
13                  proceed.

14                  (Time noted: 2:14 p.m.)

15                  (Recess.)

16                  (Time noted: 2:15 p.m.)

17                  MS. MENNINGER: Go back on  
18                  the record.

19                  Q.       At the time you were having  
20                  a discussion with Jeffrey and  
21                  Ghislaine about your weight when you  
22                  were on the island, did you have any  
23                  intention of being a model at that  
24                  time?

25                  A.       I was a freelance model. I



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1                   HIGHLY CONFIDENTIAL AEO  
2       wanted to increase my workload to help  
3       fund my living expenses. So it was  
4       not my intention to be a full-time  
5       model, because I quite clearly applied  
6       to a college to get an education that  
7       I was promised by Jeffrey Epstein.

8           Q.       Between January of 2007 and  
9       today, have you worked as a model?

10          A.       No.

11          Q.       When you left for South  
12       Africa, did you have a ticket to  
13       return to the U.S.?

14          A.       At that time, a return  
15       ticket hadn't been booked by Jeffrey  
16       yet.

17          Q.       You traveled to South Africa  
18       to visit your family without a return  
19       ticket?

20          A.       Yes.

21          Q.       Did anyone travel with you  
22       to South Africa?

23          A.       No.

24          Q.       Your mother was not in South  
25       Africa when you went to South Africa

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1                   HIGHLY CONFIDENTIAL AEO

2       on that occasion in 2007, correct?

3           A.       Correct.

4           Q.       What did you do while you  
5       were in South Africa in February of  
6       2007?

7           A.       Spend time with my family.

8           Q.       Anything else?

9           A.       I spent time with my family,  
10       that's -- that's it.

11          Q.       Did you visit any modeling  
12       agencies?

13          A.       Yes, I did visit some  
14       modeling agencies.

15          Q.       Which modeling agencies did  
16       you visit?

17          A.       I can't remember the exact  
18       names. The modeling agencies were on  
19       Long Street in Cape Town. I visited  
20       several modeling agencies on Long  
21       Street, and Bree Street as well. Bree  
22       Street and Long Street and a few  
23       others in central Cape Town. So I  
24       visited a few, actually.

25          Q.       Had you worked with any of

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1                   HIGHLY CONFIDENTIAL AEO

2       those modeling agencies in the past?

3           A.       No.

4           Q.       Did you have any connections  
5       with any of those modeling agencies?

6           A.       No.

7           Q.       Did you have an agent at  
8       that time?

9           A.       No.

10          Q.       What did you do when you  
11       visited the modeling agencies in Cape  
12       Town in February of 2007?

13          A.       I was requested to look for  
14       a PA for Mr. Epstein.

15          Q.       What does that mean?

16          A.       It means that he told me he  
17       would pay me a certain amount of money  
18       to find him a PA in South Africa.

19          Q.       What do you understand the  
20       initials PA to stand for?

21          A.       Personal assistant.

22          Q.       What are the job  
23       responsibilities of a personal  
24       assistant?

25          A.       To book flights, type, do

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1                   HIGHLY CONFIDENTIAL AEO

2        faxes.   Basically a PA is your -- a  
3        CEO's right-hand man of, you know,  
4        company's -- anything business-wise.  
5        They do everything, really, for that  
6        person.

7           Q.        When did Jeffrey ask you to  
8        find him a PA while in South Africa?

9           A.        Before I went.

10          Q.        Did you agree to do that?

11          A.        Yes.

12          Q.        And you did go to the  
13       modeling agencies?

14          A.        I told Jeffrey I did, but I  
15       actually -- I went to a couple and  
16       then I just -- it wasn't right. My  
17       gut instinct was -- yeah.

18          Q.        What happened when you went  
19       inside the modeling agencies in Cape  
20       Town?

21          A.        I was humiliated. I was  
22       completely embarrassed. I couldn't  
23       even ask them what Jeffrey was  
24       wanting. I mean, it was so absolutely  
25       ridiculous, his request of me finding

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1                   HIGHLY CONFIDENTIAL AEO

2       him a PA.

3           Q.       So what happened?

4           A.       So I -- I asked if they had  
5       any girls that would want to travel;  
6       they would be put up in accommodation  
7       and they would be a PA.

8                   And when I actually spoke to  
9       the modeling agencies, they actually  
10      laughed at me, because it was quite  
11      ridiculous that a young 22-year-old  
12      was asking a modeling agencies for a  
13      18-year-old PA for a multi-billionaire  
14      who had several already.

15          Q.       So you recall a conversation  
16      where the person you were speaking to  
17      started laughing?

18          A.       Yes.

19          Q.       What type of person were you  
20      describing that you were looking for?

21          A.       The same specifications that  
22      Jeffrey told me: She had to be 18,  
23      thin, very young looking, pretty.

24          Q.       Anything else?

25          A.       Well, bright and able to

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1                   HIGHLY CONFIDENTIAL AEO

2     type.

3           Q.       Did you go on a diet while  
4     you were in South Africa?

5           A.       I was forced to go on a  
6     diet.

7           Q.       Tell me what you mean by  
8     forced to go on a diet.

9           A.       After that incident on the  
10    island in -- it was December, when  
11    Ghislaine brought me back to the main  
12    house after she -- she sent a search  
13    party. She led a search party to find  
14    me on the island and bring me back.

15          Q.       Ghislaine led a search  
16    party?

17          A.       Yeah, yeah, yeah. She got  
18    everyone together and they all went  
19    looking for me when I disappeared.

20          Q.       Who went looking for you?

21          A.       ██████ ██████, Jeffrey, the  
22    girls, Ghislaine.

23          Q.       Which girls?

24          A.       ██████████ and ██████████ the girl  
25    named ██████████

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did Jeffrey go searching for  
3   you?

4           A.       Yes.

5           Q.       How do you know that?

6           A.       I was told.

7           Q.       About whom?

8           A.       By [REDACTED] and the other  
9   girl.

10          Q.       Where were you located?

11          A.       On the island.

12          Q.       Where on the island?

13          A.       A corner of the island.

14          Q.       On the water?

15          A.       No. It was quite a long  
16   drop off the -- it was like a  
17   cliff-type -- I wasn't able to jump or  
18   get in the water.

19          Q.       Your intent was to swim off  
20   the island, but you didn't make it  
21   into the water?

22          A.       No, because I would have  
23   killed myself, so it wasn't safe.

24          Q.       So who located you on this  
25   corner of the island?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember who got to  
3 me first. I remember the -- I can't  
4 remember who found me first.

5           Q.       Do you remember anyone who  
6 found you?

7           A.       Yes, I was definitely found  
8 because I didn't have enough time to  
9 find a different location on the  
10 island so I could get off and swim  
11 away from Jeffrey and Ghislaine.

12          Q.       Once they found you, what  
13 happened?

14          A.       I was brought back to the  
15 main house.

16          Q.       How were you brought back?

17          A.       The same way that I got  
18 there, on the, like, beach buggy,  
19 black 4-by-4, not -- what are they.  
20 Quad things.

21                   MS. MCCAWLEY: Quad bikes?

22          A.       Quad bikes, yeah.

23          Q.       Did you bike back?

24          A.       Yes.

25          Q.       Accompanied by some people?



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I was accompanied back, yes.

3           Q.       By whom?

4           A.       I can't remember  
5 specifically who it was.

6           Q.       Okay. And once you got  
7 back, what happened?

8           A.       They tried to calm me down.

9           Q.       And then what happened?

10          A.       From that evening onwards, I  
11 was -- Jeffrey put me on the Atkins  
12 Diet.

13          Q.       Did you calm down?

14          A.       Yes, I did.

15          Q.       Did you take some more  
16 medications?

17          A.       No. When you're on  
18 prescription drugs, you only take them  
19 at a specific required time.  
20 Generally you don't take more than  
21 your prescription when you're on  
22 prescription drugs, so you don't kind  
23 of just throw tablets in your mouth.  
24 You kind of just take them in the  
25 morning or --

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       I asked a bad question.

3           A.       Yeah.

4           Q.       You said earlier that the  
5   prescriptions were causing you to gain  
6   weight, I thought you said.

7           A.       Yes.

8           Q.       And then you just said you  
9   were put on a diet after this event,  
10   correct?

11          A.       Yes.

12          Q.       And what do you mean by you  
13   were put on a diet?

14          A.       Jeffrey said, you either go  
15   on the Atkins Diet, or I can go.

16          Q.       Go meaning off the island?

17          A.       As in, don't call me back,  
18   Sarah.

19          Q.       Here's the question: Did  
20   you discontinue the medications at the  
21   same time you went on the Atkins Diet?

22          A.       No.

23          Q.       And how long were you on the  
24   Atkins Diet?

25          A.       Long enough for my kidneys

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1                   HIGHLY CONFIDENTIAL AEO

2       to be incredibly painful and for me to  
3       no longer continue on the diet because  
4       it was unsafe to do so.

5           Q.       Did you seek medical help  
6       for that pain?

7           A.       I just took painkillers.

8           Q.       What painkillers did you  
9       take?

10          A.       I can't remember what  
11       painkillers.

12          Q.       Prescription or  
13       over-the-counter?

14          A.       Over-the-counter.

15          Q.       Were you on the diet for  
16       more than a week?

17          A.       Yes, I was.

18          Q.       More than a month?

19          A.       Yes.

20          Q.       More than two months?

21          A.       I can't remember.

22          Q.       Were you on the diet the  
23       whole time you were in South Africa?

24          A.       Yes.

25          Q.       Did you continue on the diet

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1                   HIGHLY CONFIDENTIAL AEO

2       after you returned?

3           A.       Yes.

4           Q.       What was the lowest weight  
5       that you reached during that period of  
6       time on the diet?

7           A.       56 kilograms.

8           Q.       Had you ever weighed  
9       56 kilograms in your adult life --

10          A.       No.

11          Q.       -- previously?

12          A.       No.

13          Q.       Have you since?

14          A.       No.

15          Q.       Did you speak to Jeffrey  
16       again about that diet?

17          A.       Multiple times.

18          Q.       What did you say?

19          A.       I complained frequently  
20       about the diet that he had put me on,  
21       because it was seriously affecting my  
22       physical health as well as my mental  
23       health. Yeah, it's a pretty hectic  
24       diet.

25          Q.       The time you were on this

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1                   HIGHLY CONFIDENTIAL AEO

2       diet, did you have a boyfriend?

3           A.       Oh, yeah.   Yes.

4           Q.       Who was your boyfriend at  
5       the time?

6           A.       ██████████

7           Q.       ██████████

8           A.       That's ██████████ ██████████ This is  
9       ██████████

10          Q.       What's ██████████ last name?

11          A.       I think it's ████████████████████

12          Q.       Where did he live?

13          A.       In the Upper East Side.

14          Q.       Did you talk to ██████████ about  
15       your diet?

16          A.       Yes.

17          Q.       Were you living with ██████████

18          A.       Not at -- not when I was in  
19       South Africa.

20          Q.       When you returned from South  
21       Africa, did you move in with ██████████

22          A.       Yes, I did, to get away from  
23       Jeffrey.

24          Q.       And where on the Upper East  
25       Side did ██████████ live?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember.

3           Q.       Walkup or elevator building?

4           A.       Elevator.

5           Q.       How big was that apartment?

6           A.       It's relatively small.

7           Q.       More than one bedroom?

8           A.       No, it was just one bedroom.

9   It was a small, tiny apartment.

10          Q.       And what did [REDACTED] do for a  
11   living?

12          A.       He was a [REDACTED]

13          Q.       Where did he work?

14          A.       He worked at -- I can't  
15   remember where he worked.

16          Q.       How did you meet [REDACTED]

17          A.       At a delicatessen, when I  
18   was buying food.

19          Q.       Had you started dating him  
20   before you went to South Africa?

21          A.       I think we had gone on a  
22   couple dates or something.

23          Q.       Where had you gone on your  
24   dates?

25          A.       I can't remember.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. When you were in South  
3 Africa, did you have contact with  
4 [REDACTED]

5 A. Once or twice, like three  
6 times. Well, we were sort of seeing  
7 each other, so I don't know how many  
8 phone times I spoke to him in a month.  
9 Yeah, a few times I spoke to [REDACTED]

10 Q. When you spoke to him, did  
11 he ask you to move in with him when  
12 you returned?

13 A. I wouldn't really say that.  
14 I wouldn't really say he asked me to  
15 move in.

16 Q. Okay. What would you say?

17 A. I asked him for me to move  
18 in with him.

19 Q. Okay. While you were in  
20 South Africa, did you receive any  
21 phone calls from Jeffrey?

22 A. Yes.

23 Q. Did you want Jeffrey to call  
24 you there?

25 A. Yes. He was helping me get

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1                   HIGHLY CONFIDENTIAL AEO

2       into FIT.

3           Q.       Any other reason for you to  
4       have communications while you were in  
5       South Africa?

6           A.       I was living in his  
7       apartment.

8           Q.       In South Africa?

9           A.       In New York.

10          Q.       So you wanted to have  
11       communications with Jeffrey while you  
12       were in South Africa because you were  
13       living in his apartment in New York?

14                   MS. MCCAWLEY: Objection.

15          A.       And he was going to -- he  
16       promised that he would pay for my  
17       education. And I was staying in his  
18       apartment and he was funding my life,  
19       so of course I would want him to  
20       contact me.

21                   And, also, he was still --  
22       he told me he would pay for my return  
23       ticket. So, yeah, of course I wanted  
24       him to contact me.

25                   (An off-the-record



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1                   HIGHLY CONFIDENTIAL AEO

2           discussion was held.)

3           Q.       Did you have an intention  
4   while you were in South Africa to go  
5   to Miami upon your return?

6           A.       I think there was a vague  
7   conversation about it, but I had no  
8   real intention of going to Miami. I  
9   had a conversation with [REDACTED] about  
10   it.

11          Q.       What, if anything, were you  
12   going to do in Miami?

13          A.       I can't remember.

14          Q.       Did you have a job lined up  
15   in Miami?

16          A.       I can't remember.

17          Q.       An internship?

18          A.       It was something to do with  
19   Jeffrey, that Jeffrey, [REDACTED] and --  
20   it would have -- it would have -- it  
21   was through Jeffrey, something with  
22   Miami. I can't remember what it was  
23   for or -- I don't remember. It  
24   didn't -- it was just a conversation  
25   about Miami.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So not a real firm plan to  
3 go to Miami?

4           A.       No, no.

5           Q.       Were you disappointed when  
6 you didn't go to Miami?

7           A.       No, no, not at all.

8           Q.       And you weren't planning to  
9 be a model in Miami, for example?

10          A.       No.

11          Q.       You said that Jeffrey had  
12 agreed to pay for your education?

13          A.       Yes.

14          Q.       Did you apply to any other  
15 school besides FIT?

16          A.       No.

17          Q.       Do you know whether you met  
18 the qualifications to get into FIT?

19                   MR. GUIRGUIS: Objection,  
20 form.

21          A.       Yes.

22                   MR. GUIRGUIS:  
23 Comprehensibility.

24                   MS. MENNINGER: She seemed  
25 to understand it just fine.

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: I don't know  
3           if she did, but fine.

4           Q.       Do you know how much FIT was  
5           supposed to cost per year?

6           A.       No.

7           Q.       Did you believe it to be  
8           expensive?

9           A.       All schools are expensive.

10          Q.       You had previously attended  
11       Queen Margaret College; is that right?

12          A.       Queen Margaret University.

13          Q.       My apologies.

14                   How much did Queen Margaret  
15       University cost?

16          A.       I can't remember.

17          Q.       Did you apply for any  
18       financial aid for FIT?

19          A.       No. Jeffrey was covering  
20       FIT.

21          Q.       That's what Jeffrey told  
22       you?

23          A.       Multiple, multiple times.

24          Q.       Did Ghislaine Maxwell say  
25       anything to you with regards to FIT?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       It was various  
3       conversations. It was known among  
4       everyone that I was going to FIT, and  
5       Jeffrey -- everyone knew he was  
6       helping me to get into FIT. It was  
7       common knowledge.

8           Q.       You described earlier that  
9       Ghislaine was helping review your  
10      application and your essay.

11                   Was there something else  
12      that she was doing to help you?

13          A.       Well, she said she would,  
14      but whether she did, I have no idea.  
15      She said she would. Whether she made  
16      calls, I doubt, because I didn't end  
17      up at FIT. So...

18          Q.       Did you get accepted there?

19          A.       I never heard from anyone at  
20      FIT.

21          Q.       You never got a response?

22          A.       No.

23          Q.       Did you have an email  
24      address at that time?

25          A.       Yes, I did.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you have a copy of your  
3   FIT application?

4           A.       I think it's somewhere. I  
5   think it's in the email.

6           Q.       There's an essay and then  
7   there's an application, correct?

8           A.       Yes, that's correct. I can  
9   find the essay if you want.

10                  MR. GUIRGUIS: I think we've  
11               already produced that essay.

12          Q.       While you were in South  
13   Africa, did you have any phone  
14   conversation with Ghislaine?

15          A.       Yes.

16          Q.       When was that?

17          A.       Through various times  
18   throughout my stay in South Africa.

19          Q.       What phone were you using  
20   while you were in South Africa?

21          A.       I had the BlackBerry that  
22   they had given me, and they also  
23   phoned my parents' landline as well.

24          Q.       Who is they?

25          A.       Jeffrey, Ghislaine and

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1                   HIGHLY CONFIDENTIAL AEO

2                   [REDACTED] [REDACTED]

3           Q.       Did Ghislaine speak to your  
4           parents?

5           A.       Yes.

6           Q.       Who did she speak to?

7           A.       I can't remember if she  
8           spoke -- I can't remember, actually.  
9           I can't remember who she spoke to.

10          Q.       How do you know that she  
11          spoke to your parents?

12          A.       Because I remember it being  
13          a huge thing, and my family -- because  
14          they couldn't quite understand what  
15          Jeffrey and Ghislaine were doing  
16          paying for their daughter's education,  
17          and they obviously thought --  
18          suspected something was going on.

19          Q.       So how do you know that  
20          someone spoke to your parents?

21          A.       Because my parents and I  
22          fought about it.

23          Q.       Did your parents tell you  
24          that they spoke to Ghislaine?

25          A.       I -- I can't remember. I

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1                   HIGHLY CONFIDENTIAL AEO

2       remember having a huge row with my  
3       family because they had spoken to --  
4       so there were multiple phone calls  
5       during the duration of that month,  
6       okay. There's not a specific call.  
7       There were multiple calls.

8                   There were multiple emails.  
9       I produced emails during that time  
10      frame, back-and-forth emails between  
11      [REDACTED] [REDACTED] and myself. So they  
12      were -- they contacted me regularly.  
13      Ghislaine, [REDACTED] [REDACTED] and Jeffrey  
14      Epstein phoned me a few times.

15           Q.       Did your parents tell you  
16      that they spoke to Ghislaine?

17           A.       I knew with my own -- that  
18      they had spoken to Ghislaine.

19           Q.       How did you know that?

20           A.       Because I know that they had  
21      spoken. They told me that they had  
22      spoken. I know she made communication  
23      with my family.

24           Q.       Your family told you that  
25      they had spoken to Ghislaine?

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS: Objection,  
3           asked and answered.

4           A.       Yes.

5           Q.       Who in your family told that  
6   you they had spoken to Ghislaine?

7           A.       I can't remember whether it  
8   was my stepmother or my father. I  
9   cannot remember which one it was.

10          Q.       What did your stepmother or  
11   father tell you they had discussed  
12   with Ghislaine?

13          A.       That she had reassured them  
14   that my education would be paid for  
15   and -- basically that. You know, they  
16   spent a lot of time and effort  
17   reassuring my family they weren't  
18   abusing me, which they were, and that  
19   they weren't going to traffic me,  
20   which they were.

21                   So there you go. I had to  
22   lie to my family.

23          Q.       What is your stepmother's  
24   name?

25          A.       ██



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And do you have an email  
3 address or phone number for her?

4           A.       No, I don't.

5                   MR. GUIRGUIS:   Objection.  
6 No current information.   Same  
7 objection as at the outset of  
8 deposition.

9                   MS. MENNINGER:   Are you  
10 instructing her not to answer?

11                  MR. GUIRGUIS:   I am  
12 instructing her not to answer.

13          Q.       Where does [REDACTED] --

14                  MR. GUIRGUIS:   And I'm again  
15 offering you to the opportunity  
16 to proffer a reason for these  
17 questions.   And I --

18                  MS. MENNINGER:   I'll tell  
19 you.   Your client has signed an  
20 affidavit and a complaint  
21 discussing this conversation, and  
22 I'm asking for contact  
23 information for a witness to the  
24 conversation, the person who  
25 actually supposedly had a phone

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1                   HIGHLY CONFIDENTIAL AEO

2                   conversation with my client. And  
3                   you're telling me I can't follow  
4                   up with those witnesses.

5                   Q.       So please tell me how to  
6                   reach your stepmother, [REDACTED] [REDACTED]

7                   A.       I'm not going to offer you  
8                   my family's address details.

9                   MR. GUIRGUIS: You don't  
10                  have to answer.

11                  Go on.

12                  MS. MENNINGER: You may come  
13                  back and answer it another day,  
14                  but...

15                  Q.       Where does [REDACTED] [REDACTED]  
16                  live?

17                  A.       She lives in Cape Town.

18                  Q.       Where in Cape Town?

19                  A.       I don't know.

20                  Q.       Have you been in touch with  
21                  her?

22                  A.       Not recently, no.

23                  Q.       When is the last time you  
24                  communicated with her?

25                  A.       A while back.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       More than a year?

3           A.       Less than a year.

4           Q.       Is she still married to your  
5 father?

6           A.       I presume so.

7           Q.       Have you talked to him in  
8 the same period of time?

9           A.       No.

10          Q.       Why haven't you talked to  
11 your family in more than a year?

12                   MS. MCCAWLEY: Objection.

13           This is getting into her current  
14 relationships, which is not  
15 relevant to the case and also can  
16 be used for harassment.

17          Q.       Why haven't you talked to  
18 your family in a year?

19          A.       Because I came forward.

20          Q.       When did you come forward?

21          A.       October, around October.

22          Q.       Have you spoken to your  
23 family since October?

24          A.       No.

25          Q.       When was the last time you

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1                   HIGHLY CONFIDENTIAL AEO

2       spoke to your father or stepmother  
3       before October?

4           A.       September.

5           Q.       And did you tell them not to  
6       contact you or did they tell you not  
7       to contact them?

8           A.       Well, I didn't -- I  
9       basically said to them, either accept  
10      me for who I am or we need to stop  
11      this relationship.

12          Q.       What did you mean by accept  
13      you as you are?

14          A.       I've made a lot of poor  
15      choices, particularly Jeffrey, being  
16      involved with Jeffrey Epstein. And  
17      they feel I've come a long way from  
18      that time, and they thought that they  
19      didn't want me going back to a time  
20      that was very traumatic for me.

21          Q.       Did they tell you they would  
22      not be in touch with you going  
23      forward?

24          A.       I didn't give them that  
25      option for them to tell me that.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So your not having a  
3 conversation with your father and  
4 stepmother in a year is because of  
5 your choice to come forward?

6 A. That's correct.

7 Q. What about your mother?

8 MR. GUIRGUIS: Objection to  
9 form.

10 A. What about my mother?

11 Q. Have you had contact with  
12 her in a year?

13 A. Yes.

14 Q. When was the last time you  
15 had contact with your mother?

16 A. Last week.

17 Q. When you returned to New  
18 York and moved in with [REDACTED] did you  
19 talk to [REDACTED] about Jeffrey Epstein?

20 A. Yes.

21 Q. What did you tell [REDACTED]

22 A. I told him that I was  
23 frightened.

24 He was incredibly concerned  
25 about my weight loss and about the

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1                   HIGHLY CONFIDENTIAL AEO

2       weight goal that Jeffrey and Ghislaine  
3       set for me, which was 52 kilograms.  
4       He was scared for me, actually.

5           Q.       To your knowledge, did he  
6       contact anyone about it?

7           A.       Not to my knowledge.

8           Q.       What did he do about his  
9       concern, to your knowledge?

10          A.       I begged him if I could live  
11       with him, and he agreed.

12          Q.       How long did you live with  
13       him?

14          A.       It wasn't really long,  
15       because I moved in with him after  
16       South Africa. So about a month or  
17       something.

18          Q.       From the time you returned  
19       from South Africa to when you returned  
20       to South Africa?

21          A.       Oh. Yeah, no, we only kind  
22       of went -- we only dated for briefly.  
23       It wasn't a serious relationship.  
24       Yeah. So when I moved to New York --  
25       sorry, back to London, kind of our

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1                   HIGHLY CONFIDENTIAL AEO  
2       relationship couldn't really go  
3       anywhere, I guess.

4           Q.       The long distance?

5           A.       Yeah, long distance doesn't  
6       really work, so...

7           Q.       So about the time you moved  
8       back to London is when you and he  
9       broke up?

10          A.       That's correct.

11          Q.       Have you had contact with  
12       him since then?

13          A.       I had contact with him again  
14       in 2008.

15          Q.       Did you come back to the  
16       U.S. then?

17          A.       No.

18          Q.       You did not come back to the  
19       U.S. in 2008?

20          A.       Oh, I did, sorry, for a  
21       business trip. I went -- I did a  
22       tour, yeah, from -- I think it was  
23       Atlantic to Atlanta to San Francisco.

24          Q.       With which business?

25          A.       Belfairs International.

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1                   HIGHLY CONFIDENTIAL AEO

2       It's a private company at that time  
3       that did private planes, the interiors  
4       of private planes.

5                   (An off-the-record  
6       discussion was held.)

7       Q.       One more time. Can you  
8       spell that?

9       A.       Sorry. B-A-R- -- sorry, B-  
10      -- sorry. It's getting so bad. I'm,  
11      like, really bad at spelling. It's  
12      B-E-L-F-A-I-R-S, Belfairs  
13      International.

14      Q.       You were working with them  
15      in 2008?

16      A.       Briefly.

17      Q.       And you came for a business  
18      trip?

19      A.       Yes.

20      Q.       And how long were you in the  
21      U.S. on that occasion?

22      A.       Gosh, I can't remember. It  
23      was like a week.

24      Q.       And who did you come with?

25      A.       My manager of business.



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       What was that person's name?

3           A.       ██████████

4           Q.       What's the last name?

5           A.       I can't remember the last  
6   name.

7           Q.       So you came back to the U.S.  
8   in 2008, but you did not have contact  
9   with ██████████ on that trip?

10          A.       No.

11          Q.       When did you have contact  
12   with ██████████ in 2008?

13          A.       He moved to London in 2008.

14          Q.       Did you see him in London?

15          A.       Yes, I did.

16          Q.       Where did you see him?

17          A.       He came to stay with me in  
18   London.

19          Q.       Did you resume your  
20   relationship?

21          A.       Briefly.

22          Q.       Is that the last time you've  
23   had contact with him?

24          A.       Yes.

25          Q.       Was that about the time you

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1                   HIGHLY CONFIDENTIAL AEO

2       became engaged to --

3           A.       ██████████

4           Q.       -- ██████████

5           A.       ██████████ and I got together at  
6       the end of 2008. We didn't meet and  
7       then get engaged immediately. It was  
8       like we dated and then got engaged.

9           Q.       Understood.

10                   In addition to discussing  
11       Jeffrey with ██████████ is there someone  
12       else you discussed Jeffrey with in  
13       your life in 2006 or 2007?

14           A.       Well, I discussed it with  
15       everyone I knew. It's quite an amaz-  
16       -- he's an amazing man. Yeah,  
17       everyone I knew knew that I was  
18       involved with Jeffrey Epstein.  
19       Everyone that I met in New York knew  
20       that I was affiliated with Jeffrey  
21       Epstein and Ghislaine Maxwell.

22           Q.       More specifically, who did  
23       you tell that you had concerns about  
24       your relationship with Jeffrey?

25           A.       My friend ██████████ And there

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1                   HIGHLY CONFIDENTIAL AEO

2       were a few other friends I had at the  
3       time, but I don't remember their  
4       names.

5           Q.       Did you discuss it with

6       [REDACTED]

7           A.       Yes.

8           Q.       What did you tell [REDACTED]

9           A.       Everything that Jeffrey did  
10      to me. I told her every single detail  
11      on how he abused me.

12          Q.       How did Jeffrey abuse you?

13          A.       There were times that I was  
14      -- I mean, look, I was intimidated. I  
15      was frightened of Jeffrey, okay. I  
16      wanted to go to FIT, get an education.  
17      But if I didn't comply with Jeffrey's  
18      requests, I was scared. Okay?

19                   So how did he abuse me?

20      When he had me on, like, the massage  
21      table, I had no option. So how did he  
22      abuse me? By putting a vibrator and  
23      pushing it down on my clitoris for ten  
24      minutes, that's abuse. That was not  
25      pleasurable; that was exceptionally

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1                   HIGHLY CONFIDENTIAL AEO

2       painful.   He hurt me physically and he  
3       abused me mentally, both.

4           Q.       How did he abuse you  
5       mentally?

6           A.       Jeez.   Well, I think the  
7       fact that -- A, physical abuse always  
8       leads to mental abuse.   It's a fact.  
9       So you can't physically abuse someone  
10      and they can't be mentally, because  
11      they will -- without a doubt, I'm sure  
12      myself and all the other girls will  
13      have suffered some form of  
14      posttraumatic stress.

15                   So in terms of how did he  
16      mentally abuse me?   He bullied me.   He  
17      went on about my weight.   He  
18      intimidated me.   He promised me things  
19      he didn't deliver.   I mean, I could go  
20      on.   So...

21           Q.       What things did he promise  
22      you that he didn't deliver?

23           A.       An education.

24           Q.       And what do you know about  
25      what he did or didn't do to get you an

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1                   HIGHLY CONFIDENTIAL AEO

2       education?

3           A.       Well, I didn't go to FIT, so  
4       I presume not very much.

5           Q.       Do you know why you didn't  
6       get into FIT?

7           A.       No, no.   It just didn't ever  
8       materialize.

9           Q.       Did you ever contact FIT to  
10      find out?

11          A.       During that time, Jeffrey  
12      had it in hand.   I didn't think I  
13      needed to contact anybody at FIT.   I  
14      mean, Jeffrey -- it was Jeffrey's  
15      contact in the first place that he was  
16      contacting.   So I didn't contact  
17      anyone at FIT.

18          Q.       You didn't contact them at  
19      all?

20          A.       Well, no, because Jeffrey  
21      said that he was going to do that for  
22      me to get me into FIT.

23          Q.       And how did you ever confirm  
24      or deny that you weren't admitted to  
25      FIT?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I was never told. I was  
3 never given a letter. I didn't have  
4 anyone phone me. I didn't have the  
5 contact that Jeffrey had been speaking  
6 to about getting me in. She didn't  
7 contact me. So I'm presuming as an  
8 educated woman it was all hearsay,  
9 because nothing ever materialized from  
10 that.

11          Q.       Did FIT have your address at  
12 [REDACTED]'s?

13          A.       Not that I recall.

14          Q.       Did you give Jeffrey your  
15 address at [REDACTED]'s?

16          A.       Yes, Jeffrey knew where I  
17 lived.

18          Q.       I understood you were going  
19 to live with [REDACTED] in order to get away  
20 from Jeffrey.

21          A.       So when -- so basically when  
22 you live in someone's apartment, it's  
23 a form of control. So when you don't  
24 comply with their instructions all the  
25 time, hundred percent, it's like

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1                   HIGHLY CONFIDENTIAL AEO

2       leverage for them to control you.

3                   I don't like being  
4       controlled by people, especially by  
5       someone like Jeffrey Epstein and  
6       Ghislaine Maxwell.

7                   So Jeffrey Epstein, he knew  
8       where I was all the time, so...

9           Q.       Did Jeffrey come to [REDACTED]'s  
10      apartment?

11          A.       He came around the Upper  
12      East Side near the apartment, yes, he  
13      did. There was an occasion that  
14      Jeffrey Epstein picked me up when I  
15      didn't go to the mansion.

16          Q.       Picked you up where?

17          A.       I can't remember the  
18      location.

19          Q.       Jeffrey lived on the Upper  
20      East Side?

21          A.       I can't remember where  
22      Jeffrey -- his exact location is. I  
23      mean, it's a nice -- I think it's near  
24      5th. It's near 5th Avenue.

25          Q.       Was it on the Upper East

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1                   HIGHLY CONFIDENTIAL AEO

2       Side?

3           A.       I think. I don't think it  
4       was on the West Side. So hang on. So  
5       5th Avenue is there. Is the West Side  
6       that side?

7                   I don't know -- sorry. I'm  
8       really -- I'm a tourist, so I don't  
9       know. I don't know where Jeffrey -- I  
10      know that he's got -- it was near 5th  
11      Avenue. That's where I know his  
12      apartment was.

13                  I'm not a New Yorker, so...

14      Q.       Do you recall an occasion  
15      while you were living with [REDACTED] that  
16      Jeffrey came and picked you up?

17      A.       Yes.

18      Q.       Somewhere on the Upper East  
19      Side?

20      A.       Yes.

21      Q.       You don't know where?

22      A.       No, I don't know the  
23      specific street, name or pavement that  
24      I was standing on, no, I don't.

25      Q.       Where did you go with



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1                   HIGHLY CONFIDENTIAL AEO

2       Jeffrey when he picked you up on the  
3       Upper East Side?

4           A.       I got in his car and went  
5       back to his mansion.

6           Q.       What kind of car was it?

7           A.       It was a -- I can't remember  
8       what car it was.

9           Q.       Who was driving the car?

10          A.       He wasn't driving. I can't  
11       remember who was driving.

12          Q.       Was anyone else in the car?

13          A.       Someone was driving the car.

14          Q.       Anyone else?

15          A.       I can't remember anyone  
16       else.

17          Q.       What was the purpose of your  
18       going back to the mansion on that  
19       occasion?

20          A.       I don't know. You're going  
21       to have to ask Jeffrey.

22          Q.       Why did you get in the car?

23          A.       Because I was frightened.

24          Q.       What were you frightened of?

25          A.       The fact that he had found

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1                   HIGHLY CONFIDENTIAL AEO

2       me and wasn't supposed to know where I  
3       was. So I was incredibly intimidated  
4       that he drove up beside me and knew  
5       where I was.

6           Q.       You were somewhere out on  
7       the street visible and he found you?

8           A.       No. I was supposed to meet  
9       Jeffrey. I was instructed to meet  
10      Jeffrey. I failed to turn up to meet  
11      Jeffrey and Jeffrey found me.

12          Q.       Who instructed you to meet  
13      Jeffrey?

14          A.       It was one of the girls. It  
15      was either [REDACTED] [REDACTED] or [REDACTED]

16      [REDACTED]

17          Q.       How did they instruct you to  
18      meet Jeffrey?

19          A.       Via the BlackBerry they gave  
20      me.

21          Q.       You kept the BlackBerry  
22      after you returned from South Africa?

23          A.       Yes, I did.

24          Q.       While you were living with

25      [REDACTED]

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.

3           Q.       Why did you keep the  
4 BlackBerry after you were living with  
5 [REDACTED]

6           A.       Because Jeffrey and I were  
7 still in contact.

8           Q.       What were you in contact  
9 about? The FIT application?

10          A.       He was trying to get me a  
11 visa, and he -- he devised a way of me  
12 getting -- I don't know what you call  
13 it, sorry -- an apprenticeship, an  
14 internship with a cosmetic company.  
15 Yeah, a cosmetic agency, doctor's  
16 medical facility.

17          Q.       When you came back from  
18 South Africa in February of 2007, did  
19 you have a tourist visa?

20          A.       Yeah, yes.

21          Q.       So Jeffrey was trying to  
22 help you get a job so you could get a  
23 different kind of visa?

24          A.       Yeah. Well, you can't live  
25 in New York on a tourist visa. It's

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1                   HIGHLY CONFIDENTIAL AEO  
2     three months, so -- so I don't know  
3     what it's like anymore, the laws. But  
4     back then, if you wanted to tour  
5     America, you would go and fill -- I  
6     think it was 90 days, but then you  
7     would have to leave. You couldn't  
8     stay.

9                   And Jeffrey was trying to  
10    get me a -- it's difficult, not  
11    being -- it's difficult actually going  
12    to university here if you don't have a  
13    British -- I don't know the system. I  
14    just didn't have a visa I could go to  
15    FIT.

16                  And this friend of his that  
17    owned a cosmetic surgery, he had  
18    organized that I would go in and do an  
19    internship, and that way would be a  
20    legitimate way to -- for me to get a  
21    visa, for me to stay and continue in  
22    FIT. If that makes sense.

23           Q.       What was the name of that  
24    friend?

25                  MR. GUIRGUIS: Do you need a

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1                   HIGHLY CONFIDENTIAL AEO

2                   break?

3                   THE WITNESS:   I do, sorry.

4                   Do you mind?

5                   MS. MENNINGER:   There was a  
6                   question pending.

7                   MR. GUIRGUIS:   She has a  
8                   question pending.   You can answer  
9                   that, then.   Go ahead.

10                  What was the name of that  
11                  friend?

12                  THE WITNESS:   I don't know.  
13                  It was a man.

14                  Q.           Did you end up working in  
15                  that internship?

16                  A.           No.

17                  Q.           Did you ever meet with that  
18                  man?

19                  A.           Yes.

20                  Q.           Why didn't you end up  
21                  working in that internship with that  
22                  man?

23                  A.           I wanted to return home.

24                  MR. GUIRGUIS:   Can we take  
25                  that break?

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MENNINGER: Yes.

3 (Time noted: 3:04 p.m.)

4 (Recess.)

5 (Time noted: 3:20 p.m.)

6 MS. MENNINGER: Going back  
7 on the record.

8 MR. GUIRGUIS: Before you  
9 proceed with your questions,  
10 Counsel, I raised an objection to  
11 providing [REDACTED] [REDACTED]'s email  
12 address before. Then you  
13 proffered a reason for it.

14 I accept your proffer and I  
15 will provide you that email  
16 address now, or have the witness  
17 do it.

18 MS. MENNINGER: Okay.

19 THE WITNESS: It's

20 [REDACTED]

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

23 MR. GUIRGUIS: And let the  
24 record reflect she's taking it  
25 down from a Google search on the

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1                   HIGHLY CONFIDENTIAL AEO

2           web.    She believes that's right.

3           Q.       What is your father's email  
4   address?

5           A.       I don't remember it offhand.

6                   MS. MENNINGER:   Can you mark  
7   this.

8                   (Defendant's Exhibit 3,  
9   affidavit, was marked for  
10   identification.)

11          Q.       Do you recognize the  
12   document we marked as Defendant's  
13   Exhibit 3?

14          A.       Yes.

15          Q.       What is it?

16          A.       My affidavit.

17          Q.       Who wrote this affidavit?

18          A.       Well, I -- I -- I didn't  
19   type it up, but I gave the affidavit.

20          Q.       So you spoke words to  
21   someone else and they typed it?

22          A.       Yes.

23          Q.       Who was that person?

24          A.       I don't know.

25          Q.       Who was the person you gave

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1                   HIGHLY CONFIDENTIAL AEO

2       words to?

3                   MR. GUIRGUIS:   Was it an  
4       attorney?

5                   THE WITNESS:   Yes.

6                   MR. GUIRGUIS:   Okay.

7       Q.       Which attorney?

8                   MR. GUIRGUIS:   I think I'm  
9       going to object to that. I don't  
10      know that it matters which  
11      attorney or which attorney  
12      provided the work or did specific  
13      tasks. I think that's  
14      privileged.

15      Q.       Did you communicate these  
16      words to a attorney with the intent  
17      that they would put it into an  
18      affidavit that you would share  
19      publicly?

20      A.       I don't know that the  
21      affidavit is public, but to share  
22      with -- with you guys.

23      Q.       With a third party?

24      A.       Yeah, with a third party.

25      Q.       And you knew that at the



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1                   HIGHLY CONFIDENTIAL AEO

2       time you were giving the words to the  
3       person to type up?

4           A.       Yeah, to give to you guys.

5           Q.       So who was the person that  
6       you were speaking to that took down  
7       the words for your affidavit?

8           A.       Sorry. It was Stan and  
9       Brad.

10          Q.       And when did you have that  
11       conversation with them?

12          A.       I think it was either -- I  
13       think it was in January.

14          Q.       Last month?

15          A.       Oh, God. Last month. Yeah,  
16       last month.

17          Q.       In person?

18          A.       In person.

19          Q.       Did they give you multiple  
20       drafts of this document?

21          A.       I wouldn't say multiple, but  
22       I made sure that it was accurate.

23          Q.       Did you make any changes to  
24       the document you were originally  
25       presented with?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       The first document that you  
4   were presented with, is that the one  
5   that you signed?

6           A.       Yes.

7           Q.       And nothing was changed  
8   after you reviewed it?

9           A.       No.

10          Q.       Is that your signature on  
11   the second page?

12          A.       Yes, that is my signature.

13          Q.       And the last page, is that  
14   the official in Spain who witnessed  
15   your signature?

16          A.       Yes.

17          Q.       Did you sign page 2 in front  
18   of the person indicated on page 3?

19          A.       Yes.

20          Q.       Did you present that person  
21   with some form of identification?

22          A.       Yes.

23          Q.       What form of identification  
24   did you present?

25          A.       My passport.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Which passport?

3           A.       My British passport.

4           Q.       Is that a current British  
5 passport?

6           A.       Yes.

7           Q.       Did you have a British  
8 passport that expired in 2014?

9           A.       Yeah, I can't remember when  
10 it expired, but I think you guys have  
11 a copy as well of my passport. I  
12 don't remember the exact date that it  
13 expired.

14          Q.       Not the South African  
15 passport that was stolen?

16          A.       The South African passport  
17 is completely irrelevant. You can't  
18 travel on a South African passport.  
19 It's -- you can't go into any other  
20 country bar South Africa, other than  
21 South Africa, on a passport. So I've  
22 hardly used my South African passport  
23 at all.

24          Q.       I'm just asking which  
25 passport you showed to the person on

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1 HIGHLY CONFIDENTIAL AEO

2 page 3.

3 A. Sorry. My British passport.

4 Q. And it's a British passport  
5 that's current?

6 A. Yes.

7 MR. GUIRGUIS: Asked and  
8 answered.

9 MS. MENNINGER: Just a bit  
10 of a detour.

11 Q. Can I have you take a look  
12 at paragraph 1?

13 A. Yep.

14 Q. Is paragraph 1 true?

15 A. "I am currently over the age  
16 of 18," paragraph 1, yes.

17 Q. And you presently reside in  
18 Spain?

19 A. Yes.

20 Q. Paragraph 2, you state, "In  
21 the summer of 2006, when I was  
22 22 years old and living in New York, I  
23 was introduced to Jeffrey Epstein by a  
24 girl I had met named [REDACTED]

25 [REDACTED]"

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1                   HIGHLY CONFIDENTIAL AEO

2                   Is that true?

3           A.       Yes.

4           Q.       Was it the summer of 2006  
5 when you met [REDACTED]

6           A.       Okay, well, it was summer.  
7 End of summer going into fall.

8           Q.       So when was it, do you  
9 think?

10          A.       It was fall of 2006. It was  
11 just after the summer.

12          Q.       So it was the fall of 2006  
13 when you met [REDACTED]

14          A.       Well, it was the end of the  
15 summer, so I don't know -- fall or in  
16 the summer or -- it was end of summer,  
17 fall.

18          Q.       Sometime after you came into  
19 the U.S.?

20          A.       Yes, yeah.

21          Q.       And do you know when in the  
22 fall of 2006 you met [REDACTED]

23          A.       What, you mean the end of  
24 summer/fall slash -- if you really  
25 want to go -- can you define, like,

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1                   HIGHLY CONFIDENTIAL AEO

2       geography lessons?   Should we do

3       geography lessons?

4                   MS. MCCAWLEY:   All right.

5           Hang on a second.

6           A.       Maybe summer?   Fall?

7       Winter?   What are your dates here in

8       New York?

9                   MR. POTTINGER:   Can we get  
10       this clear?

11                  MR. PAGLIUCA:   Would you  
12       just stop it?

13                  MR. POTTINGER:   Do you mind?  
14       Do you mind?

15                  MR. PAGLIUCA:   I mind you  
16       talking.

17                  MR. POTTINGER:   Do you mind?

18                  MS. MENNINGER:   If you want  
19       to enter an objection, please do  
20       so.

21                  MR. POTTINGER:   I object.

22                  MS. MENNINGER:   What is the  
23       basis of your objection, Mr.  
24       Pottinger?

25                  MR. POTTINGER:   Define

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1                   HIGHLY CONFIDENTIAL AEO

2                   summer or fall.

3                   MS. MENNINGER: I will do  
4                   whatever I want during my  
5                   deposition.

6                   MR. POTTINGER: Define --  
7                   define summer or fall.

8                   MS. MENNINGER: I don't have  
9                   to define anything.

10                  MR. POTTINGER: Define  
11                  summer or fall for the client --

12                  MS. MENNINGER: All right.

13                  MR. POTTINGER: -- and then  
14                  we will answer the -- she will be  
15                  able to answer the question.

16                  MS. MENNINGER: I'm going  
17                  off the record until you calm  
18                  down.

19                  Let's go off the record.

20                  (Time noted: 3:28 p.m. )

21                  (Recess.)

22                  (Time noted: 3:30 p.m.)

23                  MS. MENNINGER: Go back on  
24                  the record.

25                  Q.       Approximately what month and

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1                   HIGHLY CONFIDENTIAL AEO

2       day did you meet [REDACTED] [REDACTED]

3           A.       As I said earlier, I can't  
4       remember what day, but it was end of  
5       summer/fall in the United States. I  
6       can't remember what specific date or  
7       time that was.

8           Q.       What month? Any idea?

9           A.       It was September.

10          Q.       When did you meet Jeffrey  
11       Epstein?

12          A.       Shortly after I met [REDACTED]

13          Q.       Was that also in September?

14          A.       I guess so. I don't know  
15       the exact date I arrived, so if  
16       someone can provide me with my  
17       passport so I can see my entry date,  
18       maybe that would help.

19                 So I met [REDACTED] -- if you  
20       look at the date that I arrived in New  
21       York on my passport, I think it's very  
22       clear when I arrived. You've got the  
23       evidence, I'm sure.

24                 So two weeks after the date  
25       that is on my passport that I arrived



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1                   HIGHLY CONFIDENTIAL AEO  
2     in, I met [REDACTED] Very soon after I  
3     met [REDACTED] I was introduced to  
4     Jeffrey Epstein. It was in and around  
5     September. I can't specifically  
6     remember the date, time, season,  
7     whatever.

8           Q.       Did you show your passport  
9     to Mr. Pottinger and Mr. Edwards when  
10    you were standing there at the  
11    consulate having the affidavit  
12    notarized?

13          A.       I showed my current passport  
14    when I had this signed.

15          Q.       Not the passport that  
16    contained dates from 2006?

17          A.       My current valid passport.  
18    You can only show a valid passport.

19          Q.       Fair enough.

20                    So you believe that your  
21    lawyers have produced your current  
22    valid passport to me?

23          A.       No --

24                    MS. MCCAWLEY: Objection.

25          A.       -- they have not produced my

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1                   HIGHLY CONFIDENTIAL AEO

2       current passport. They produced have  
3       my passport during that time frame,  
4       which clearly shows that -- when I  
5       entered the United States.

6           Q.       So when your lawyers wrote,  
7       "A copy of nonparty Sarah Ransome's  
8       current passport is attached hereto as  
9       RANSOME 157 to 168, which should be  
10      treated as confidential pursuant to  
11      the party's protective order," do you  
12      believe that to be an accurate  
13      statement?

14                  MS. MCCAWLEY:   Objection.  
15                You're asking her legal  
16                information that she's not privy  
17                to.

18                  MS. MENNINGER:   There was  
19                nothing legal about that comment.

20           A.       Sorry. That makes no sense  
21       to me, please. Can you repeat the  
22       question.

23           Q.       I'll do it this way.

24                  MS. MENNINGER:   Defendant's  
25                Exhibit 4.

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1                   HIGHLY CONFIDENTIAL AEO

2                   (Defendant's Exhibit 4,  
3           RANSOME\_000168, was marked for  
4           identification.)

5           Q.       Take a look at Defendant's  
6   Exhibit 4.

7           A.       Okay.

8           Q.       Just take a look at it. Do  
9   you recognize it?

10          A.       Yeah, this is my passport.

11          Q.       Do you know which passport  
12   this is?

13          A.       This is my old passport.

14          Q.       So it's not your current  
15   passport, correct?

16          A.       No, it's not my current  
17   passport, because it expired on --  
18   let's have a look here --

19          Q.       Can you turn to the  
20   second-to-last page. Sorry.

21          A.       Yes, here we go.

22          Q.       Does that have a Bates  
23   number? In other words, your name,  
24   RANSOME, with an underscore and then  
25   page numbers after that, that were

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1                   HIGHLY CONFIDENTIAL AEO

2       placed there by your attorneys.

3           A.       Hmm, sorry. I don't  
4       understand.

5           Q.       Do you see at the bottom of  
6       that page, your name, RANSOME\_000158?

7           A.       Yes.

8           Q.       All right. And that's on a  
9       document that is an expired passport?

10          A.       Yes.

11          Q.       This is not your current  
12       passport?

13                   MR. GUIRGUIS: Objection,  
14       asked and answered.

15          A.       No.

16          Q.       You have another passport  
17       that's not this passport that's  
18       currently in effect?

19                   MR. GUIRGUIS: Objection,  
20       asked and answered.

21          Q.       Correct?

22          A.       Yes.

23          Q.       If I could also have you  
24       take a look at -- and I'll have to  
25       show, if you can see, there are the

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1                   HIGHLY CONFIDENTIAL AEO

2   passport page numbers --

3           A.       Mm-hmm.

4           Q.       -- that show up on a  
5   passport.

6           A.       Yeah.

7           Q.       And these have been put in  
8   some order.

9           A.       Mm-hmm, the order of my  
10   passport, yes.

11          Q.       Right. That's not how they  
12   were produced, but that's the order  
13   they're in now.

14          A.       Okay.

15          Q.       If we could have you turn to  
16   RANSOME 162, which is page 16 of your  
17   passport.

18                   MR. GUIRGUIS: Is that the  
19   front -- sorry, 162.

20                   MS. MENNINGER: They're not  
21   in Bates order. They're put in  
22   the order of the passport.

23                   THE WITNESS: Oh, yeah.

24           Mm-hmm.

25                   MS. MENNINGER: It's page

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1                   HIGHLY CONFIDENTIAL AEO

2           16.

3           Q.       Do you see on that page a  
4   stamp from the Department of Homeland  
5   Security of the U.S., dated  
6   October 19, 2006?

7           A.       Mm-hmm.

8           Q.       Does that indicate to you  
9   that you were admitted to visit the  
10   U.S. on October 19th of 2006?

11          A.       Yes, it does.

12          Q.       Do you believe October 19th  
13   is during the summer in the U.S.?

14          A.       No. I don't see the  
15   relevance.

16          Q.       What season do you think  
17   October 19th is in the U.S.?

18          A.       Okay. Well, considering I  
19   arrived in September, October's in  
20   winter. But I arrived in September.

21          Q.       Okay. Well, do you believe  
22   that you did not enter the U.S. on  
23   October 19th, 2006?

24          A.       Well, it's stamped.

25          Q.       Does it say "admitted"?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.        "Admitted," yes.

3           Q.        Does it say "October 19,  
4   2006"?

5           A.        Yes.

6           Q.        Does it say "Department of  
7   Homeland Security, U.S. Customs and  
8   Border Patrol"?

9           A.        Yes.

10          Q.        So you do or do not believe  
11   you were admitted to the United States  
12   on October 19, 2006?

13          A.        I flew in and had my  
14   passport stamped after I went on my  
15   trip to London in the UK.

16                    Every time you go into a --  
17   as you all know, using your passport,  
18   every time you go into a new country,  
19   if you don't have their passport, you  
20   get a stamp. So if you go in several  
21   times, every time you go into that new  
22   country, it gets stamped.

23          Q.        So you think you went on a  
24   trip in October and came back to the  
25   U.S. on October 19th?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I obviously went -- I  
3 arrived in New York a day on the 19th  
4 of October.

5           Q.       Where were you coming from  
6 on October 19th?

7           A.       I can't remember.

8           Q.       You have no idea?

9           A.       I think it was London. I  
10 made a trip to London.

11          Q.       And how long were you in  
12 London in October?

13          A.       I can't remember.

14          Q.       A week?

15          A.       I can't remember.

16          Q.       Who paid for that ticket?

17          A.       Myself.

18          Q.       Did you go with anyone?

19          A.       No.

20          Q.       Did you have a new 90 days  
21 that began on October 19th?

22          A.       Yes. It automatically  
23 starts every time you enter.

24          Q.       So in order to be compliant  
25 with that visa, you needed to leave



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1                   HIGHLY CONFIDENTIAL AEO

2       within 90 days of October 19th?

3           A.       That's correct.

4           Q.       Do you know which airline  
5       you flew to London in 2006?

6           A.       I can't remember.

7           Q.       Do you know which class of  
8       service you flew?

9           A.       I can't remember.

10          Q.       Where is your current  
11       passport right now?

12          A.       It is in my hotel room.  
13       Here, in -- it's in my hotel room.

14          Q.       Got it.

15                   Did [REDACTED] fly with you to  
16       London?

17          A.       No.

18          Q.       Did Jeffrey pay for you to  
19       go to London?

20          A.       I can't remember.

21          Q.       Do you know whether you had  
22       met Jeffrey before you went to London  
23       in October of 2006?

24          A.       I had met Jeffrey by then.

25          Q.       Do you have any emails or

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1                   HIGHLY CONFIDENTIAL AEO

2           anything reflecting your travel plans  
3           on that trip?

4           A.       Oh, I think there was a  
5           plane, I think there was a plane  
6           booking or something.

7           Q.       For that trip to London in  
8           October of 2006?

9           A.       I think so. I would have to  
10          double check.

11          Q.       Where would you check?

12          A.       Well, I'm trying to go and  
13          find it in my email, my old email  
14          account, where all of my other emails  
15          exchanged between [REDACTED] [REDACTED] and  
16          [REDACTED] [REDACTED] are.

17          Q.       Do you have any frequent  
18          flyer accounts?

19          A.       No.

20          Q.       Did your first trip to the  
21          private island in the U.S. Virgin  
22          Islands before or after you went to  
23          London and returned?

24          A.       What was the date in October  
25          again? 19th. I can't remember. I

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1                   HIGHLY CONFIDENTIAL AEO

2       mean, I said earlier I can't remember  
3       the first time.

4           Q.       In the next sentence you  
5       say, "After that first trip, I  
6       traveled to the island several more  
7       times, usually on one of Jeffrey's  
8       private airplanes, and always at his  
9       direction."

10                   What do you mean by "always  
11       at his direction"?

12           A.       Well, I wasn't going to go  
13       there on my own, so I would have to be  
14       invited first. I didn't want to just  
15       go chill on my own. It was Jeffrey's  
16       house, so he had to phone me and  
17       invite me before I decided I wanted to  
18       go to his island.

19           Q.       So he phoned you, he invited  
20       you, and you decided you wanted to go  
21       to his island.

22           A.       No, I had to go to his  
23       island.

24           Q.       Why did you have to go to  
25       his island?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Because I was frightened of  
3 him.

4           Q.       Did Jeffrey ever hit you?

5           A.       No, he didn't.

6           Q.       Did you ever see Jeffrey  
7 with a weapon?

8           A.       No.

9           Q.       Have you reviewed any flight  
10 logs?

11          A.       No, not that I recall.

12          Q.       You've never seen a flight  
13 log?

14          A.       I've seen one which showed  
15 my name.

16          Q.       When did you first become  
17 frightened of Jeffrey Epstein?

18          A.       During my time with him in  
19 New York.

20          Q.       What period of time?

21          A.       Pretty much soon after I met  
22 him, actually, and he forced the  
23 vibrator on my vagina for an extended  
24 period of time, which considerably  
25 hurt my lady region, actually.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       That's when you became  
3   frightened of him?

4           A.       Yes, absolutely.

5           Q.       You've seen a flight log  
6   with your name on one flight?

7           A.       Yes, I have.

8           Q.       When did you see that?

9           A.       I saw it in January, and it  
10   was to confirm that --

11                   MR. GUIRGUIS: I'm going to  
12   object. Hold on.

13                   Is this -- if this is a  
14   communication with counsel, you  
15   should understand, any time she  
16   asks you a question, if the  
17   answer is it was with counsel,  
18   then you don't answer.

19                   Was this with counsel?

20                   THE WITNESS: Yes.

21                   MR. GUIRGUIS: Don't answer.

22                   MS. MENNINGER: Seeing a  
23   document when you're with counsel  
24   is privileged?

25                   MR. GUIRGUIS: I don't know

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1                   HIGHLY CONFIDENTIAL AEO

2                   what your next question is going  
3                   to be, so...

4                   MS. MENNINGER: I asked her  
5                   when she saw the flight logs.  
6                   And she said in January, correct?

7                   MR. GUIRGUIS: Right. And  
8                   then she was about to continue  
9                   the answer. I'm fine with the I  
10                  saw it in January. That's why I  
11                  didn't object when you asked the  
12                  question.

13                  I'm objecting to her  
14                  continuing and caution the  
15                  witness not to waive her  
16                  attorney/client privilege.

17                  Q. Don't tell me anything that  
18                  your lawyer said to you.

19                  You reviewed the flight log  
20                  in January?

21                  A. I reviewed one flight log,  
22                  which confirmed that I was there.

23                  Q. What other documents did you  
24                  review?

25                  A. No other documents.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. In addition to Jeffrey and  
3 [REDACTED] what other girls did you have  
4 sexual relations with on the island?

5 A. I can't remember their  
6 names.

7 Q. Can you remember any of  
8 their names?

9 A. There were a few.

10 Q. Can you remember any of  
11 their names?

12 A. [REDACTED] -- sorry, I  
13 misunderstood your question. I didn't  
14 have sexual relations with [REDACTED]  
15 Sorry, I misunderstood you.

16 It was [REDACTED] and  
17 [REDACTED] And there were a couple  
18 others, I don't remember their names.

19 Q. What are other guests did  
20 you have sexual relations with on the  
21 island?

22 A. It was only those ones.

23 Q. Do you know the ages of any  
24 of the individuals you had sexual  
25 relations with on the island?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       They were 18, I assumed.

3    [REDACTED] was around my age, was my age.

4           Q.       In the next paragraph, you  
5    refer to meeting Ghislaine Maxwell on  
6    one of your visits to the island,  
7    correct?

8           A.       Correct.

9           Q.       You said, "Watching her  
10   interact with the other girls on the  
11   island, it became clear to me that she  
12   recruited all or many of them to the  
13   island."

14                   What do you mean that?

15          A.       That she recruited a lot of  
16   the girls.

17          Q.       What did you see?

18          A.       I saw how she interacted  
19   with all the girls. You know, if you  
20   walk into any -- I mean, common  
21   sensewise, if you walk into a firm,  
22   you kind of know who the boss is.

23                   You know, all the girls kind  
24   of reported to Ghislaine. Ghislaine  
25   was like the mama bear, if you know



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1                   HIGHLY CONFIDENTIAL AEO

2       what I mean. She called the shots; we  
3       had to listen to Ghislaine.

4                   And Ghislaine was Jeffrey's  
5       right-hand woman, so, you know,  
6       whatever Jeffrey wanted went through  
7       Ghislaine and then filtered through.

8           Q.       What did any girl report to  
9       Ghislaine in your presence?

10                  MR. GUIRGUIS: Objection.

11               I'm not sure that's -- just  
12               objection to form.

13           Q.       You said that the girls  
14       reported to Ghislaine. What did you  
15       see or hear that caused you to say  
16       that?

17           A.       Well, it's pretty obvious.  
18       I mean, Ghislaine called the shots.

19                   So, for example, when -- I  
20       can't remember specifics, but [REDACTED]  
21       I think, had an issue. And she had to  
22       speak to Ghislaine if there was ever  
23       an issue.

24           Q.       What issue?

25           A.       I can't remember

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1 HIGHLY CONFIDENTIAL AEO

2 specifically. We always have issues.  
3 Girls have issues. We have period  
4 pains, we've got headaches.

5 You know, we had to look a  
6 certain way for Jeffrey. So if we put  
7 on a little bit of weight or, for  
8 example, if my hairstyle was wrong --  
9 Jeffrey liked girls to look a certain  
10 way.

11 So, for example, there was  
12 one occasion where Jeffrey didn't like  
13 my hair and Ghislaine told me to  
14 change it.

15 So there was -- everyone was  
16 afraid of Ghislaine. All the girls  
17 were afraid of her, so everyone --  
18 [REDACTED] [REDACTED] reported to her. [REDACTED]  
19 [REDACTED] reported to her. I don't know  
20 how to tell you.

21 So when I say reporting, I  
22 witnessed with my own two eyes [REDACTED]  
23 [REDACTED] reporting to Ghislaine in front  
24 of me, but I can't remember specifics.  
25 They were talking about girls. I

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1                   HIGHLY CONFIDENTIAL AEO

2       can't remember the specific  
3       conversation. But every single person  
4       100 percent, 200 percent reported to  
5       Ghislaine. 100 percent.

6           Q.       Okay. Great. I appreciate  
7       your certainty.

8           A.       Absolutely.

9           Q.       So we have [REDACTED] [REDACTED]  
10       having a discussion with Ghislaine  
11       about girls. What other discussions  
12       did you overhear?

13          A.       There were various  
14       discussions. We were always talking  
15       about girls. There was a constant  
16       influx of girls. There were so many  
17       girls. There were girls in Miami.  
18       There were guests coming. There  
19       were --

20                   It's like, I'm sure if you  
21       go into a hooker's brothel and see how  
22       they run their business, I mean, it's  
23       just general conversation about who's  
24       going to have sex with who and, you  
25       know -- what do you talk about when

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1                   HIGHLY CONFIDENTIAL AEO

2     all do you is have sex every day on  
3     rotation? I mean, what is there to  
4     talk about?

5           Q.       You were in Miami? When did  
6     you go to Miami?

7                   MR. GUIRGUIS: Objection.

8                   MS. MCCAWLEY: Objection.

9           A.       No, I didn't go to Miami. I  
10    didn't say that.

11          Q.       Apart from general  
12    conversation, do you recall any  
13    specifics of any female reporting to  
14    Ghislaine?

15          A.       Yes, I saw. And with my own  
16    eyes, I saw how Ghislaine and [REDACTED]  
17    [REDACTED] and the other girls reported to  
18    them.

19                   If you would like me to  
20    report specific conversations, I  
21    can't. But in my being an adult and  
22    having common sense and a sensible  
23    head on my shoulders, you can quite  
24    quickly work out who is the management  
25    there.

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1                   HIGHLY CONFIDENTIAL AEO

2                   And we were told by Jeffrey  
3 Epstein to listen to Ghislaine. So  
4 Ghislaine was the main right-hand  
5 woman of Jeffrey Epstein. We were  
6 told by Jeffrey Epstein to listen to  
7 Ghislaine.

8           Q.       When did Jeffrey Epstein  
9 tell you that?

10          A.       I can't remember the exact  
11 time, date or where I was standing, on  
12 which pavement or crack. But it was  
13 around the time that I met Ghislaine.

14          Q.       Which was on the island?

15          A.       I can't remember what date,  
16 time, pavement, where I was standing.  
17 But I was told during around the time  
18 I met Ghislaine that I had to listen  
19 to Ghislaine.

20          Q.       By Jeffrey?

21          A.       By Jeffrey. And every  
22 single other girl that I've ever met  
23 with Jeffrey.

24          Q.       And we know three names, but  
25 that's it?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Those are three names that I  
3   remember, but I met -- I met lots of  
4   girls.   Lots.

5           Q.       Okay.

6           A.       Yeah.

7           Q.       What activities was  
8   Ghislaine Maxwell in charge of?

9           A.       In terms of -- can you  
10   explain activities, please?

11          Q.       I'm actually just looking at  
12   your affidavit on paragraph 3, so why  
13   don't you take a look at that.

14          A.       Activities.   Activities.   So  
15   when we had to go to the island, when  
16   we had to go see Jeffrey in New York,  
17   when we had to go to his mansion.

18                 You know, we saw Jeffrey  
19   pretty regularly.   I was on rotation  
20   pretty much every day, so -- amongst  
21   other girls.

22                 So Ghislaine also called  
23   me -- she also called the other  
24   girls -- when Jeffrey wanted his  
25   massage.   So there was an occasion

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1                   HIGHLY CONFIDENTIAL AEO

2       that I didn't want to go, and she got  
3       angry with me because I didn't want to  
4       give Jeffrey a massage.

5           Q.       When was that?

6           A.       It was on one of my -- one  
7       of my stays on the island. I can't  
8       remember what specific date or what  
9       specific time.

10          Q.       How many times were you on  
11       the island with Ghislaine?

12          A.       I can't remember  
13       specifically.

14          Q.       More than once?

15          A.       Yeah.

16          Q.       More than twice?

17          A.       I can't remember. I also  
18       saw her in New York quite a lot, so --  
19       I mean, this isn't just based on the  
20       island. I spent just as much time  
21       with Jeffrey and Ghislaine in New  
22       York, so we can't just concentrate on  
23       the island, please.

24          Q.       Did you believe Ghislaine  
25       was living in New York in January of

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1                   HIGHLY CONFIDENTIAL AEO

2       2007?

3           A.       I don't know where the hell  
4       Ghislaina lived, to be honest.

5           Q.       But you saw her regularly in  
6       January of 2007?

7                   MR. GUIRGUIS:   Objection.

8                   MS. MCCAWLEY:   Objection.

9           A.       Regularly, what's regularly?  
10       I saw her a few times.   I don't know  
11       where she was living.   I tried to  
12       actually not spend -- well, I tried to  
13       spend as little time with her as  
14       possible because every time I saw her  
15       on the island, she would call me to  
16       give Jeffrey a massage, so...

17          Q.       You saw her more than once  
18       on the island and you saw her a few  
19       times in New York.   Did you see her  
20       anywhere else?

21                  MR. GUIRGUIS:   Objection.

22                  MS. MCCAWLEY:   Objection,  
23       mischaracterizes testimony.

24          A.       No.

25          Q.       In New York, you saw her at



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1                   HIGHLY CONFIDENTIAL AEO

2       Jeffrey's office. Did you see her  
3       anywhere else in New York?

4           A.       I can't remember. I saw  
5       them, I spent a lot of time with them,  
6       so...

7           Q.       How much time did you spend  
8       with Ghislaine?

9           A.       Enough.

10                  MR. GUIRGUIS: Objection.

11                 That's vague.

12           A.       Enough time. I mean, how  
13       long is a piece of string? I was here  
14       for a certain amount of time, and in  
15       that time, the majority of the time I  
16       spent with Jeffrey Epstein being  
17       involved with his pedophiling -- I  
18       mean, how much time have you spent  
19       with him? I don't know. It wasn't a  
20       lot of time, because I couldn't stand  
21       the woman and she was a bully and no  
22       one liked her, so no one really went  
23       out of their way to spend time with  
24       her.

25                         So I didn't spend a lot of

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1                   HIGHLY CONFIDENTIAL AEO  
2     time with her because she's a  
3     particularly unpleasant person. And  
4     when I did spend time with her, it was  
5     either directing me to massage Jeffrey  
6     or her showing me how to massage  
7     Jeffrey, or I spent a lot of time with  
8     her on the island.

9                   Yeah, so how much time did I  
10    spend with Ghislaine in total of  
11    hours? I can't recall because it was  
12    ten years ago. I mean, how many hours  
13    did I spend with Jeffrey? I mean,  
14    what a silly question.

15           Q.     How many days did you see  
16    Ghislaine?

17           A.     Don't know.

18           Q.     Less than ten or more than  
19    ten?

20           A.     I can't remember.

21           Q.     Less than five or more than  
22    five?

23           A.     Can't remember.

24           Q.     You indicate that many girls  
25    you saw appeared to be young

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1                   HIGHLY CONFIDENTIAL AEO

2       teenagers.   Where did you see young  
3       teenagers?

4           A.       It says they appeared to be  
5       teenagers.   All the girls I saw looked  
6       young.

7           Q.       Okay.   Where did you see  
8       girls who appeared to be young  
9       teenagers?

10          A.       On the island and in New  
11       York.

12          Q.       Describe for me a young  
13       teenager that you saw.

14                   MR. GUIRGUIS:   Objection,  
15       mischaracterizes testimony.

16          A.       So I never said I saw a  
17       teenager.   They appeared to look like  
18       teenagers, okay?   ██████████ was -- I try  
19       to look at ██████████ I don't know how  
20       old ██████████ is, but she looked young.  
21       And I'm sure you can agree, as a mom,  
22       in the photos, that she looks pretty  
23       young for an old man to be bonking.  
24       So she looks really young.   She looks  
25       younger than me.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you see her bonk  
3 someone?

4           A.       No, but she told me. She  
5 told me and [REDACTED] that they abused her  
6 on the island.

7           Q.       [REDACTED] said they abused who  
8 on the island?

9                   MR. GUIRGUIS: Objection,  
10 mischaracterizes testimony.  
11 That's not what she said.

12          A.       [REDACTED] said that Jeffrey  
13 and [REDACTED] had abused her.

14          Q.       Okay. And do you have any  
15 way to reach [REDACTED]

16          A.       I haven't spoken to her. I  
17 don't -- I just know her first name.

18          Q.       You said you recall seeing  
19 "a particularly young, thin girl who  
20 looked well under 18," and you recall  
21 asking her her age.

22                   When did you see this  
23 particularly young, thin girl who  
24 looked well under 18 and you recall  
25 asking her age?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       It was on the trips. I  
3 think you've got the photos. [REDACTED]  
4 is in the photos. So it was that trip  
5 in December.

6           Q.       Did you take a photo of the  
7 young, thin girl who looked well under  
8 18?

9           A.       I think I did take a photo  
10 of her. I don't have any more photos  
11 of her of my own.

12                   Well, I have photos of her.  
13 You've got the photos.

14          Q.       So the person --

15          A.       I've given you all the  
16 photos that I have.

17          Q.       The person that you wrote  
18 here was "a particularly young, thin  
19 girl who looked well under 18" is  
20 reflected in photographs you've  
21 produced in this case?

22          A.       That's correct.

23          Q.       And do you know her name?

24          A.       Sorry, can you just repeat  
25 that? Didn't I just answer this

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1 HIGHLY CONFIDENTIAL AEO

2 question?

3 Yeah, that's [REDACTED] who I  
4 was particularly concerned about,  
5 about her age, in the photos that I  
6 have supplied with -- you with, with  
7 me in them with [REDACTED]

8 Q. So in your affidavit in  
9 paragraph 3 where you talk about "a  
10 particularly young, thin girl who  
11 looked well under 18," you are  
12 referring to [REDACTED]

13 A. Yes.

14 Q. And you said you later  
15 learned she was a [REDACTED]

16 A. That's correct.

17 Q. How did you learn she was a  
18 [REDACTED]

19 A. Because she told me. And  
20 she told me Jeffrey Epstein was  
21 funding her [REDACTED] [REDACTED]

22 Q. And where was her [REDACTED]  
23 [REDACTED]

24 A. I don't know.

25 Q. When did she tell you this?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       During that December trip.

3           Q.       Was that the only trip you  
4 took with her?

5           A.       I can't -- I can't remember.  
6 I think there was another trip, but I  
7 can't remember.

8           Q.       Did you ever see her name on  
9 a flight log?

10          A.       No.

11          Q.       Was she on the plane with  
12 you?

13          A.       I can't -- I can't remember.  
14 I can't remember. Yeah, I just  
15 remember [REDACTED] on the island.

16          Q.       Other than her telling you  
17 she was a [REDACTED] did she tell you  
18 anything else about herself?

19          A.       Yeah, you know, I think she  
20 came from quite a tough background.

21          Q.       What did she say?

22          A.       Well, I can't remember the  
23 specifics, but I remember that -- I  
24 don't know if she had issues with her  
25 parents -- I don't know. She was a

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1                   HIGHLY CONFIDENTIAL AEO

2       bit of a -- you know, she was a -- I  
3       was worried about her.

4           Q.       What did she say to cause  
5       you to be worried about her?

6           A.       Well, I first met her -- she  
7       was new to Jeffrey Epstein's list of  
8       girls in December. And when I first  
9       met her, she was a really bubbly girl  
10      and -- I mean, she was young. She was  
11      inexperienced. She -- she was frail.  
12      And she changed quite quickly after  
13      that first trip.

14          Q.       How many trips did you take  
15      with her?

16          A.       I think it was more than  
17      one. I can't remember. I saw her a  
18      lot.

19          Q.       Where did you see her?

20          A.       Oh, it was either New York  
21      or the island. I mean, I can't  
22      remember.

23          Q.       In New York, where did you  
24      see her?

25          A.       I think we met -- like we



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1                   HIGHLY CONFIDENTIAL AEO

2       all met a couple times in New York.

3       We all kind of knew each other.

4           Q.       Did you ever see her [REDACTED]

5           A.       No.

6           Q.       Did she live in an apartment  
7       that you went to?

8           A.       I can't remember about her  
9       living arrangements.

10          Q.       Do you know where her [REDACTED]

11       [REDACTED] was?

12          A.       No.

13          Q.       When did you ask to see her  
14       passport?

15          A.       When we shortly arrived to  
16       the Virgin Islands, she looked  
17       particularly young. And you know what  
18       girls are like with passport -- with  
19       passport pictures. They don't -- they  
20       get embarrassed about their passport  
21       pictures.

22                   And she was quite cagey  
23       about her passport, so she didn't show  
24       me. I don't know whether that -- I  
25       don't know. She just didn't show me.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did she say why she wasn't  
3   showing it to you?

4           A.       She said it was because she  
5   was embarrassed about the picture.

6           Q.       Were you living in the same  
7   room with her on the island?

8           A.       Yeah, we stayed in the same  
9   room.

10          Q.       Did you ever attempt to look  
11   at her passport when she wasn't there?

12          A.       No.

13          Q.       Did you ever call any  
14   authorities about having seen this  
15   young, thin girl who looked well under  
16   18?

17          A.       No.

18          Q.       In the fourth paragraph, you  
19   described being lent out to Jeffrey's  
20   friends in New York.

21                   Which friends of Jeffrey's  
22   were you lent out to to have sex?

23          A.       Alan Dershowitz.

24          Q.       Who else?

25          A.       ██████████ All the girls that

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1                   HIGHLY CONFIDENTIAL AEO

2       were involved, really. I had to have  
3       sex with them, so...

4           Q.       Well, what do you mean by  
5       lent out?

6           A.       Lent out as in -- so I was  
7       one of the girls that regularly --  
8       that Jeffrey regularly asked to see  
9       sexually.

10                   And what my description was  
11       of being lent out is when -- it's  
12       almost like Jeffrey's quite possessive  
13       of his girls. He's -- you know, he  
14       lends them out.

15                   He samples the girls, he has  
16       friends come over to New York or the  
17       island and they -- they get to see who  
18       all the girls are around Jeffrey, and  
19       they get to pick one which they want  
20       to be with.

21           Q.       So you were with Jeffrey and  
22       a number of other females in New York  
23       when a person, a friend would come in,  
24       Alan Dershowitz would come in and look  
25       at all of the girls and choose one?

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MCCAWLEY: Objection.

3 MR. GUIRGUIS: Objection,  
4 mischaracterizes testimony.

5 MS. MENNINGER: I'm asking a  
6 question.

7 MR. GUIRGUIS: I'm objecting  
8 to your question.

9 A. So let me give you a  
10 specific example of that. So, for  
11 example, there was an occasion where I  
12 and some of the other girls were on  
13 the island. So a specific occasion  
14 was when [REDACTED] -- I don't know his  
15 surname, but he owns [REDACTED] or  
16 whatever, and he came with his  
17 fiancée.

18 So, you know, you got a  
19 table with Jeffrey Epstein of lots of  
20 women -- girls, women, whatever --  
21 beautiful girls, and you've got  
22 friends joining him. And friends  
23 popped over all the time.

24 So I had other -- there were  
25 other males that visited Jeffrey on

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1                   HIGHLY CONFIDENTIAL AEO

2     the island. I don't know who they  
3     are. I can't remember their names.

4                   But, yeah. I mean, he  
5     didn't -- he didn't line them up and  
6     go, hey, boys, pick which vagina you  
7     want. He didn't do it that blatantly.

8                   But they had spent time with  
9     the girls during a lunch on the  
10    island -- yeah, I mean, they -- his  
11    friends would spend time with us.

12           Q.     Okay. In paragraph 4, where  
13    you say, "At his townhouse, I was also  
14    lent out by him to his friends and  
15    associates to have sex."

16                   What do you mean by that  
17    sentence?

18           A.     Well, I mean, it's quite  
19    obvious with the incidents -- well,  
20    the incident that happened with Alan.  
21    So I would classify that as being lent  
22    out. I didn't willingly go, hey,  
23    Alan, let's have some fun, because no  
24    one on the planet would say that to  
25    Alan.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So you say "lent out by him  
3   to his friends and associates."

4                   Who are the friends and  
5   associates that you were lent out to?

6                   MR. GUIRGUIS:  Objection,  
7   asked and answered.

8           A.       Alan Dershowitz and [REDACTED]  
9   The girls that I mentioned.  There  
10  were other girls that I had sexual  
11  intercourse with, but I can't remember  
12  their names.

13          Q.       Were there any other men?

14          A.       No, there weren't any other  
15  men.

16          Q.       [REDACTED] [REDACTED]

17          A.       No.

18          Q.       [REDACTED] [REDACTED] [REDACTED]

19          A.       No, no, I don't know that.

20          Q.       [REDACTED] [REDACTED] Yes?  No?

21          A.       No.  That I would be lent  
22  out to have sex with?

23          Q.       Yes.

24          A.       No, no.

25          Q.       Tom Pritzker?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       [REDACTED] [REDACTED]

4           A.       No.

5           Q.       Were you paid money after  
6 you had sex with Alan Dershowitz?

7           A.       No.

8           Q.       Were you paid money after  
9 you had sex with [REDACTED]

10          A.       No.

11          Q.       Were you paid money after  
12 you had sex with [REDACTED]

13          A.       No.

14          Q.       Were you paid money after  
15 you had sex with any of the other  
16 girls --

17          A.       No.

18          Q.       -- of names you can't  
19 remember?

20          A.       I was only ever paid to --  
21 when I had sex with Jeffrey himself.

22          Q.       In the course of massage?

23          A.       Yes.

24          Q.       Did you ever have sex with  
25 Jeffrey not in a massage context?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yeah, we -- yeah. He was  
3 really intimate all the time. We  
4 had -- multiple times. I can't tell  
5 you how many times I've slept with  
6 Jeffrey. I mean, we were on rotation.  
7 Every single day, it was -- sometimes  
8 twice a day I was called.

9                   You know, Ghislaine, [REDACTED]  
10 [REDACTED] -- you know, it was -- yeah. I  
11 mean, how -- we were on rotation  
12 pretty much the whole time I was here.

13       Q.       And when you say you were on  
14 rotation, you mean you were having sex  
15 with Jeffrey multiple times per day?

16       A.       No. As in when I was  
17 finished, another girl was called by  
18 Ghislaine. And when they had  
19 finished, another girl was called.

20       Q.       How do you know that another  
21 girl was called by Ghislaine?

22       A.       Because I was there, and I  
23 saw it and heard it with all my  
24 senses. I saw Ghislaine call another  
25 girl, and she called me herself, to go



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1                   HIGHLY CONFIDENTIAL AEO

2       give Jeffrey Epstein a sexual massage.

3           Q.       What do you mean by call? I  
4       guess I'm thinking like telephone.

5       That may be my --

6           A.       No. As in going up to the  
7       person and going, Jeffrey wants to see  
8       you in his bedroom, which meant it's  
9       your turn to be abused. That kind of  
10      thing.

11          Q.       And this is on the island?

12          A.       This is on the island.

13          Q.       You heard -- as soon as you  
14      were done with Jeffrey, you heard  
15      Ghislaine go up to another girl and  
16      say, it's your turn with Jeffrey?

17          A.       So every single day, I  
18      mean -- so I don't know how quickly  
19      Jeffrey's sperm bank fills up. I  
20      mean, I know guys can normally cum  
21      once or twice a day, but Jeffrey's not  
22      a normal person.

23                  So, I mean, our rotation  
24      changed every day that specific trip  
25      we had in December.

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1                   HIGHLY CONFIDENTIAL AEO

2                   So, for example, I would be  
3                   called. Maybe a couple hours when  
4                   Jeffrey had a little, you know, break,  
5                   another girl was called, [REDACTED]  
6                   Then another girl was called. Every  
7                   single day.

8                   We tried to hide on  
9                   different -- like, so we wouldn't have  
10                  to get called. We'd generally have to  
11                  sit in the main area. There was like  
12                  a big pool, the main seating area.  
13                  There was a big table. We'd sit there  
14                  and do kind of art on the table, and  
15                  we always had to be around. We  
16                  weren't allowed to go very far on the  
17                  island.

18                  We always had to report to  
19                  Ghislaine and Jeffrey and tell them if  
20                  we were going down to the beach to  
21                  swim because they had an inflatable  
22                  trampoline. So they -- I mean, we  
23                  always had to tell Ghislaine and  
24                  Jeffrey where we were at all times.

25                  Q.       On the island?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       On the island, yeah.

3           Q.       In New York -- strike that.

4                   How many times a day, to  
5 your knowledge, did Jeffrey Epstein  
6 have sex?

7           A.       To my knowledge, from what I  
8 saw and what I've witnessed -- I don't  
9 know what he did when I wasn't  
10 there -- up to about three, four times  
11 a day.

12          Q.       So you had sex with him  
13 three or four times a day?

14                   MS. MCCAWLEY: Objection.

15          A.       No.

16          Q.       I'm sorry. You said to your  
17 knowledge, what you witnessed. I'm  
18 trying to understand what you mean.

19          A.       So as soon as I slept with  
20 Jeffrey, a certain time would go by.  
21 He maybe had a coffee. And then there  
22 was a specific occasion where then  
23 [REDACTED] was called to go and do that  
24 for Jeffrey.

25          Q.       And you were not in the room

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1                   HIGHLY CONFIDENTIAL AEO

2       when [REDACTED] was with Jeffrey?

3           A.       No, but I was certainly  
4       there afterwards, because she was  
5       forced to have sex with [REDACTED] and  
6       Jeffrey Epstein.

7           Q.       That happened?

8           A.       Yes. And she had never had  
9       a female experience before and she was  
10      very upset, very upset.

11          Q.       So you didn't personally see  
12      it, but you talked to [REDACTED] and saw  
13      her afterwards?

14          A.       Well, I don't think the  
15      girls, when they were called, were  
16      making cups of tea with Jeffrey in his  
17      room. So -- and when a girl comes out  
18      crying and I know that I've been  
19      sexually abused, it's quite safe to  
20      assume.

21                   And when that girl tells you  
22      she's being forced to have sex with  
23      Jeffrey Epstein and [REDACTED] you know,  
24      it's there, isn't it.

25          Q.       So she told you?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes, she told me. And with  
3 my own intelligence, in my -- you  
4 know, I can see with my own senses. I  
5 can hear things, see things. It's  
6 quite obvious what was going on.

7                   MS. MENNINGER: I need a  
8 small break.

9                   (Time noted: 4:17 p.m.)

10                  (Recess.)

11                  (Time noted: 4:28 p.m.)

12       Q.       On Defendant's Exhibit 3 in  
13 the last paragraph, you describe  
14 having had sex with Alan Dershowitz,  
15 correct?

16       A.       Correct.

17       Q.       You say in the last sentence  
18 that you recall "specific key details  
19 of his person."

20                  What specific key details of  
21 his person do you recall?

22       A.       You know, I recall his  
23 appearance. You know, I'd met him,  
24 you know, twice beforehand. So in  
25 terms of specific key details, I can

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1                   HIGHLY CONFIDENTIAL AEO

2       describe how he looked.

3           Q.       How did he look?

4           A.       He was, as I've explained --  
5       described earlier, quite -- quite an  
6       elderly man, wore glasses, quite  
7       pasty, pasty-skinned. Not well, I  
8       assumed, not at all well. He wasn't  
9       well, W-E-L-L. Like, he wasn't a --  
10      he wasn't -- he wasn't a healthy  
11      person.

12          Q.       And do you recall whether he  
13      had a mustache?

14          A.       I can't -- I can't recall if  
15      he had a mustache, no.

16          Q.       Which of those that you just  
17      described are the key details you are  
18      referring to in paragraph 4?

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

21          A.       As I've described. I  
22      mean...

23          Q.       Pasty skin?

24          A.       Pasty skin, wrinkly. I  
25      didn't -- I tried to pay as little

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1                   HIGHLY CONFIDENTIAL AEO  
2       attention to him as possible. During  
3       that session, I was completely  
4       overwhelmed. I -- it completely took  
5       me by surprise, that incident, and I  
6       was exceptionally upset by what was  
7       going on because I felt that I had  
8       been coerced beforehand, that it had  
9       been prior arranged to me arriving  
10      there.

11           Q.       Can you describe any other  
12      specific key detail of his person that  
13      you haven't already mentioned?

14           A.       I can't remember specific  
15      ones. It was -- I just tried to just  
16      get it done as soon as possible to get  
17      out of there. I couldn't wait to get  
18      out of there quick enough, to be  
19      honest.

20           Q.       Did you tell your attorneys,  
21      I recall specific key details of this  
22      person?

23           A.       I think I've just described  
24      that key details of this person.

25           Q.       Did you say those words to

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1                   HIGHLY CONFIDENTIAL AEO

2       your attorneys when you drafted this?

3                   MR. GUIRGUIS:   Objection,  
4           asked and answered.

5                   MS. MCCAWLEY:   Objection.

6           A.       I do recall specific  
7       details, which I've given.

8           Q.       And they're the ones you've  
9       already given?

10          A.       I don't -- as I specified,  
11       this was a coerced event that took  
12       place. I was extremely upset. I did  
13       not want to have sexual intercourse  
14       with Alan.

15                   I did not -- I don't -- I  
16       don't remember specific -- I don't  
17       remember specific things. I remember  
18       ██████ -- me paying particular  
19       attention to ██████ because I didn't  
20       want Alan touching me, so it was -- as  
21       I said, it was a traumatic experience.

22                   I don't remember the finer  
23       details of Alan Dershowitz's private  
24       parts or any other thing. I tried to  
25       spend as little time as possible



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1                   HIGHLY CONFIDENTIAL AEO

2       touching Alan, as I'm sure you can  
3       imagine.

4           Q.       How was it coerced?

5           A.       It was coerced in the sense  
6       that when I arrived there, Alan  
7       Dershowitz was there and [REDACTED] was  
8       there. It was quite clear to me what  
9       their intention was after me arriving  
10      there.

11          Q.       There being where?

12          A.       Jeffrey's New York  
13      apartment.

14          Q.       When you arrived at  
15      Jeffrey's New York apartment, Alan was  
16      already there?

17          A.       Yes.

18          Q.       And [REDACTED] was already there?

19          A.       Yes.

20          Q.       What were the specific key  
21      details of the sex acts that you can  
22      remember that you have not already  
23      described?

24          A.       There was cunnilingus  
25      involved, masturbation.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Who performed cunnilingus on  
3   who?

4           A.       We all performed cunnilingus  
5   on each other.

6           Q.       So did anyone perform  
7   cunnilingus on Mr. Dershowitz?

8           A.       Is that the same as girls  
9   and boys?   Yeah, same definition.

10          Q.       Did you perform cunnilingus  
11   on [REDACTED]

12          A.       Yes.

13          Q.       Did she perform it on you?

14          A.       Yes.

15          Q.       Did Mr. Dershowitz perform  
16   it on you?

17          A.       Yes.

18          Q.       Did he perform it on [REDACTED]

19          A.       Yes.

20          Q.       And any other specific key  
21   details of the sex acts you can  
22   describe?

23          A.       There was a lot of touching,  
24   fondling, yeah.

25          Q.       When you say Professor

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1                   HIGHLY CONFIDENTIAL AEO

2       Dershowitz's name, you say Dershovitz  
3       with a V, phonetically, correct?

4           A.       I'm slightly dyslexic and  
5       I'm terrible with names. So it's  
6       known that I've always struggled with  
7       pronunciations, especially because of  
8       my accent as well.

9           Q.       Do you believe you were  
10      introduced to him as Dershovitz with a  
11      V?

12          A.       I was introduced to him as  
13      Alan.

14          Q.       Did you ever hear anyone say  
15      his last name?

16          A.       Yes.

17          Q.       Did you hear those people  
18      say it with a V?

19          A.       I can't recall the exact  
20      pronunciation of the tongue, but the  
21      way my ears hear words -- perhaps you  
22      can contact my university. I don't --  
23      I have difficulty with names and I'm  
24      slightly dyslexic, so...

25                   MS. MENNINGER:   Okay.   Can

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1                   HIGHLY CONFIDENTIAL AEO

2                   you mark this as Defendant's  
3                   Exhibit 5.

4                   (Defendant's Exhibit 5, jury  
5                   trial demand, was marked for  
6                   identification.)

7                   MS. MCCAWLEY: Because I  
8                   forget earlier, just for the  
9                   record, the plaintiff in the case  
10                  is going to mark the deposition  
11                  as confidential.

12                  MS. MENNINGER: Yes. I  
13                  discussed it with the court  
14                  reporter, and I think he already  
15                  has, but if not, he will do it.

16                  MS. MCCAWLEY: Okay.

17                  Q. Can you take a look at  
18                  Defendant's Exhibit 5.

19                  A. Yes.

20                  Q. Have you seen this document  
21                  before?

22                  A. Yes.

23                  Q. Did you review it before it  
24                  was filed?

25                  A. Yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What do you understand this  
3 document to be?

4 A. This is a complaint against  
5 Jeffrey Epstein.

6 Q. Anyone else?

7 A. Ghislaine Maxwell, [REDACTED]  
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
9 [REDACTED]

10 Q. And this is a complaint that  
11 you authorized be filed on your  
12 behalf?

13 A. That's correct.

14 Q. And at the end of this  
15 complaint, you ask for money to be  
16 awarded to you, correct?

17 A. Can you refer me to the  
18 specific page, please?

19 Q. Well, do you understand that  
20 you are asking for money to be awarded  
21 to you?

22 A. Can you tell me which page  
23 that's on, please.

24 Q. I'm just asking your  
25 understanding.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Nothing's been promised to  
3 me about money.

4           Q.       Were you seeking money when  
5 you authorized this complaint to be  
6 filed on your behalf?

7           A.       No. I just wanted a  
8 pedophile behind bars, really, and for  
9 him to stop abusing young girls.

10                   Seeing as I'm going to be a  
11 parent myself, I can't really live  
12 with myself, knowing that there's a  
13 pedophile with my kids on the planet.  
14 So as a responsible human being, I  
15 thought that I would come forward.

16           Q.       So your hope in filing this  
17 lawsuit was not to recover any money?

18           A.       No. I want Jeffery and  
19 Ghislaine and all of these people  
20 behind bars so I can then visit them  
21 in jail.

22           Q.       In paragraph 36 of this,  
23 which is on page 11, can I have you  
24 review that paragraph.

25           A.       Yep.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you know what that  
3 paragraph refers to?

4           A.       Yes, I do.

5           Q.       What is the basis for your  
6 statement that "Defendant [REDACTED]  
7 reported to Defendants [REDACTED] [REDACTED]  
8 and Maxwell, and was paid for her  
9 recruitment of young females,  
10 including the recruitment of  
11 plaintiff"?

12          A.       She told me face to face, in  
13 person, that she was paid by Jeffrey.

14                   And Jeffrey also offered to  
15 pay me \$5,000 to find him a new  
16 18-year-old model PA to help him with  
17 his multi-billionaire corporation,  
18 because she's that qualified.

19          Q.       So when you say recruitment  
20 of young females, you're referring to  
21 people who are 18?

22          A.       Yes.

23          Q.       And at the time you were in  
24 touch with Ms. [REDACTED] you were 22,  
25 correct?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       That's correct.

3           Q.       Apart from what Ms. [REDACTED]  
4 told you, do you have any other basis  
5 for knowing that [REDACTED] reported to  
6 [REDACTED] [REDACTED] and Maxwell and was paid  
7 for her recruitment of young females,  
8 including you?

9           A.       What she told me.

10          Q.       Apart from what she told  
11 you, do you have any other basis for  
12 that?

13          A.       Well, I saw it with my own  
14 eyes. I was a witness.

15          Q.       What did you witness?

16          A.       I witnessed the same thing  
17 all the other girls did, the same  
18 thing I had to do, was go and report  
19 to [REDACTED] [REDACTED] [REDACTED] [REDACTED] and  
20 Ghislaine.

21                   Ghislaine was the main lady.  
22 [REDACTED] [REDACTED] and [REDACTED] [REDACTED] did all  
23 the admin, like booking flights, like  
24 what a normal PA does.

25                   Do you understand?



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Well, did you get paid for  
3   recruitment of young females?

4           A.       Jeffrey Epstein told me that  
5   he would give me money to find him a  
6   PA for him in South Africa.

7           Q.       You did not find a PA,  
8   correct?

9           A.       Absolutely not.

10          Q.       And you did not get paid for  
11   recruitment of young females, correct?

12          A.       Absolutely not.

13          Q.       You say in paragraph 37 that  
14   you were introduced to Epstein by  
15   ██████████ correct?

16          A.       Correct.

17          Q.       And Epstein confirmed to you  
18   that he would use his wealth and  
19   influence to have you admitted into  
20   FIT, correct?

21          A.       That's correct.

22          Q.       What did Epstein say to you  
23   to confirm that? He said, I will use  
24   my wealth and influence to have you  
25   admitted, or some other words?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I can't remember the exact  
3       conversation, but from the very  
4       beginning Jeffrey and Ghislaine knew  
5       what my intentions were and why I  
6       wanted to stay in New York, which was  
7       to get a degree.

8           Q.       Did Epstein say something to  
9       you about a similar institute of  
10      higher learning offering a curriculum  
11      of fashion industry training?

12          A.       No. I was pretty adamant  
13      that I wanted to go to FIT. It's one  
14      of the best fashion schools, so...

15          Q.       In paragraph 38, you say  
16      Maxwell told you that you would "need  
17      to provide Epstein with body massages  
18      in order to reap the benefits of his  
19      and her connections."

20                   What did Ms. Maxwell say to  
21      you in regards to giving body massages  
22      in order to reap benefits of her  
23      connections?

24          A.       Well, the fact that she told  
25      me I had to weigh 52 kilograms in

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1                   HIGHLY CONFIDENTIAL AEO  
2       order for them to pay for my  
3       education, that was pretty -- that was  
4       one of the conversations that she had  
5       with me.

6           Q.       Does that have something to  
7       do with body massages?

8           A.       Can you repeat -- let me  
9       read the question again.

10                   So I would just like to  
11       clarify, body massages meant sex,  
12       okay? That's like a key word for sex.  
13       So as soon as you stop having sex with  
14       Jeffrey and his friends and his girls,  
15       you're out, because otherwise there's  
16       no reason for you to be associated  
17       with Jeffrey, because you're just  
18       there to have sex with him, so...

19           Q.       Can I direct your attention  
20       to the first sentence in paragraph 38,  
21       and can you just explain to me when  
22       that conversation took place.

23                   MR. GUIRGUIS: Objection,  
24       form.

25           A.       First time I met Ghislaine,

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1                   HIGHLY CONFIDENTIAL AEO

2       from the very first beginning.

3           Q.       What did Ghislaine say to  
4       you?

5           A.       I can't remember the  
6       specific conversation. But the fact  
7       that she helped me refine my massage  
8       skills to satisfy Jeffrey, I think  
9       it's pretty self-explanatory.

10          Q.       The one you described  
11       earlier?

12          A.       The one I described earlier.

13          Q.       Okay. In the second  
14       sentence, where it says, "Maxwell and  
15       Epstein also threatened plaintiff that  
16       while they had the ability to advance  
17       her education and career, they also  
18       had the ability to make sure that she  
19       would obtain no formal education or  
20       modeling agency contracts if she  
21       failed to provide the sexual favors  
22       desired by defendant Epstein or abide  
23       by the instructions given her by  
24       defendants Epstein and Maxwell."

25          A.       Mm-hmm.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       What did Ms. Maxwell say to  
3 you that gave rise to this particular  
4 statement?

5           A.       Well, the fact that she used  
6 to personally call me herself to give  
7 Jeffrey sexual massages. Not body  
8 massages; sexual massages. It should  
9 be rephrased.

10                   I mean, it was pretty  
11 obvious. I mean, the whole weight  
12 thing. I tried to swim off the  
13 island. I tried to escape from an  
14 island during the evening to try and  
15 escape from her because if I didn't  
16 lose weight, they would cut me out of  
17 their -- financially off. I would  
18 lose the place that I was staying at.  
19 I would lose my education. You name  
20 it.

21                   They bullied me with  
22 everything, just like they did with  
23 the other girls.

24           Q.       In paragraph 38, you say,  
25 "Maxwell and Epstein also threatened

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1                   HIGHLY CONFIDENTIAL AEO

2     plaintiff."

3                   What was the threat that was  
4     made to you by Maxwell?

5                   MS. MCCAWLEY:   Objection,  
6             asked and answered.

7             A.       The fact that I would lose  
8     everything that they promised me.  
9     They -- they were really naughty.   You  
10    know, they took girls from very  
11    underprivileged families.   They gave  
12    them accommodation, they gave them  
13    food, gave them money for  
14    transportation, you know, private  
15    planes, etcetera, etcetera.

16                   So if I didn't have sex with  
17    Jeffrey, I would be homeless and  
18    starving in New York, so -- and my  
19    dream of getting a full-time education  
20    at one of the top fashion institutes  
21    in the world would be diminished.

22                   And that's what he held over  
23    my head, exactly like he did with  
24    ██████████ and the other girls.   He was  
25    paying for all of their educations.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       How do you know that?

3           A.       Because they were telling  
4 me. It was common knowledge amongst  
5 all the girls. No other girl would be  
6 there willingly just to have sex with  
7 Jeffrey.

8           Q.       In paragraph 40, you say,  
9 "Maxwell instructed plaintiff how to  
10 massage Epstein using the techniques  
11 that he preferred."

12          A.       Correct.

13          Q.       Is that the accident you  
14 described earlier on the island?

15          A.       There were many times that  
16 she gave me massage techniques to help  
17 refine my techniques. Jeffrey Epstein  
18 was all about massages and the  
19 techniques. He liked as many girls  
20 touching him as possible all the time.

21                   So there was more than one  
22 occasion that Ghislaine showed me how  
23 to massage him. It could have been on  
24 that specific trip or the other one.

25                   I'm not quite sure day,

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1                   HIGHLY CONFIDENTIAL AEO  
2       time, what seat I was sitting in, what  
3       color the seat it is, but she on more  
4       than one occasion showed me how to  
5       massage Jeffrey and how to get out the  
6       extreme knots in his body. Because  
7       everyone knows about his knots and how  
8       he likes them to pop and, yeah, the  
9       specific techniques that he likes.

10           Q.       The next sentence reads,  
11       "During plaintiff's first massage,  
12       defendant Epstein converted it into a  
13       sexual act..." and it goes on.

14                   Your first massage that  
15       defendant Epstein converted into a  
16       sexual act was prior to you meeting  
17       Ms. Maxwell, correct?

18           A.       Yes.

19                   MS. MENNINGER: I'm going to  
20       show you Defendant's Exhibit 6,  
21       which are some photographs.

22                   (Defendant's Exhibit 6,  
23       Bates stamped Ransome\_000017, was  
24       marked for identification.)

25           Q.       Do you recognize the



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1                   HIGHLY CONFIDENTIAL AEO

2       photographs contained in Defendant's  
3       Exhibit 6?

4           A.       Yes, I do.

5           Q.       What are they?

6           A.       They are photos of Jeffrey's  
7       island and the trip in December.

8           Q.       Who took those photos?

9           A.       ██████ ██████ took these specific  
10       photos.

11          Q.       And when you were asked to  
12       provide these to us, where did you  
13       locate them?

14          A.       I had a disk that ██████ ██████  
15       had given me as a present and memento  
16       of that holiday.

17          Q.       Where is that disk now?

18          A.       In Spain.

19          Q.       Do you see in the corner  
20       there are some little numbers with  
21       your last name and then some --

22          A.       Oh, yeah, okay.

23          Q.       I'm only showing you that so  
24       we can together go through to some.

25          A.       Okay.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. So if I could ask you to  
3 turn to -- well, the first ones  
4 show --

5 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
6 [REDACTED] is kitesurfing.

7 Q. Got it.

8 A. Yeah, that's [REDACTED]

9 Q. How do you know that that's  
10 [REDACTED]

11 A. Because he came for lunch  
12 that day and [REDACTED] -- [REDACTED] hi, I'm  
13 [REDACTED]

14 Hi, [REDACTED]

15 Q. Did you have any sexual  
16 relations with [REDACTED]

17 A. No.

18 Q. If you could turn to the one  
19 that says RANSOME 22 in the corner.  
20 It's about five or six pages back.

21 A. Yes.

22 Q. Who is that in the  
23 photograph?

24 A. [REDACTED] [REDACTED]

25 Q. And who is the other person?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       That's me.

3           Q.       And when was this photograph  
4 taken?

5           A.       This was taken during the  
6 December trip.

7           Q.       Was there only one trip in  
8 December?

9           A.       From what I recall, yeah.

10          Q.       Was that the first trip that  
11 you had taken?

12          A.       No.

13          Q.       When was the first trip you  
14 had taken?

15          A.       I answered that previously,  
16 which was not so long after I met  
17 Jeffrey Epstein for the first time.  
18 So I had been there various times  
19 before these were taken.

20          Q.       Do you know how many?

21          A.       Like I said earlier,  
22 several. I mean, I...

23          Q.       And can you turn to RANSOME  
24 24?

25          A.       Mm-hmm.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Who is that?

3           A.       That's the wonderful [REDACTED]

4           [REDACTED]

5           Q.       Did you take these  
6           photographs?

7           A.       [REDACTED] [REDACTED] took these ones.

8           Q.       All of them?

9           A.       There were -- I had other  
10          photos as well.

11          Q.       That came later, a separate  
12          batch?

13          A.       Yeah, those are the hard  
14          copies.

15                   MS. MENNINGER: I will mark  
16          it now, the second batch,  
17          Defendant's Exhibit 7.

18                   (Defendant's Exhibit 7,  
19          Bates stamped Ransome\_000204, was  
20          marked for identification.)

21                   MS. MENNINGER: I apologize,  
22          Counsel. We just got these last  
23          night, so I only have one copy  
24          for the witness.

25                   MR. GUIRGUIS: That's fine.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       So is Defendant's Exhibit 7  
3 the second batch that you were  
4 referring to?

5           A.       Yes.

6           Q.       Okay. So I'm just trying to  
7 help be clear.

8                   Defendant's Exhibit 6, you  
9 believe were all given to you by [REDACTED]  
10 [REDACTED] on a disk?

11          A.       Well, there's a lot of  
12 photos here. So I took some, I had  
13 some hard copies, and they're all  
14 actually all together, so...

15          Q.       Okay, that's fine.

16          A.       Yeah. I don't want to be  
17 unclear on which exhibit is which.  
18 There's hundreds here.

19          Q.       So the photographs of [REDACTED]  
20 [REDACTED] you're saying were taken by  
21 [REDACTED] [REDACTED] that we were looking at in  
22 RANSOME 24?

23          A.       Well, I can recheck the disk  
24 and then I can actually tell you  
25 exactly which ones he took, but I

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1                   HIGHLY CONFIDENTIAL AEO

2       can't recall every single photo on  
3       ██████'s disk. But there were  
4       multiple photos that were produced  
5       from myself as well.

6           Q.       Okay. I will just ask you  
7       about a few.

8           A.       Okay.

9           Q.       RANSOME 24 is one that you  
10      said was -- of ██████ ██████ was one  
11      you said you thought ██████ ██████ had  
12      taken?

13          A.       Yes.

14          Q.       If you could turn to RANSOME  
15      40. And these are in order, so  
16      hopefully that will be easy.

17          A.       Okay. Mm-hmm.

18          Q.       Who is represented in this  
19      photograph?

20          A.       That's ██████

21          Q.       And where is ██████ in this  
22      photograph, if you know?

23          A.       This is by the beach.  
24      There's like -- there's like a small  
25      beach, like there's a beach house on

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1                   HIGHLY CONFIDENTIAL AEO

2       the beachfront.

3           Q.       Do you know who took this  
4       photograph?

5           A.       I can't remember.

6           Q.       Okay.   Turning a couple more  
7       pages to RANSOME 42, who is that?

8           A.       That's me.

9           Q.       Are you smoking?

10          A.       I am.   And that was after  
11       the argument that I had with Jeffrey  
12       about me being on lithium and me not  
13       being able to smoke.   And that was the  
14       reason I was really upset, that I  
15       couldn't smoke and that I was being  
16       put on a stupid diet.

17                   So Jeffrey -- yeah, Jeffrey  
18       said it was okay for me to smoke.   I  
19       wasn't allowed to smoke in front of  
20       him.   That was the rule.

21          Q.       Do you know who took this  
22       photograph?

23          A.       I don't remember who took  
24       that photograph.

25          Q.       Is it on the same trip in

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1                   HIGHLY CONFIDENTIAL AEO

2       December?

3           A.       Yes.

4           Q.       Turning the next page, is  
5       that also you and [REDACTED] [REDACTED]

6           A.       That's correct.

7           Q.       Do you know who took this  
8       photograph?

9           A.       I can't remember.

10          Q.       Was it also in the same time  
11       frame when you were upset?

12          A.       It was that same December  
13       trip, yes.

14                   MS. MENNINGER:   We can go  
15       off the record for just a minute.  
16       I think we're swapping out  
17       counsel.

18                   (Ms. McCawley left the  
19       hearing and Ms. Syed entered.)

20                   (Time noted:   4:56 p.m.)

21                   (Recess.)

22                   (Time noted:   4:56 p.m.)

23          Q.       Looking at RANSOME 44,  
24       you're saying it's in the same time  
25       period?



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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yeah.

3           Q.       And also true of 45?

4           A.       Yes.

5           Q.       And 47?

6           A.       Yes. It was the same  
7 holiday, the same trip.

8           Q.       And do you know who took  
9 these photographs?

10          A.       I don't remember.

11          Q.       Is that also true for 48,  
12 49, 50, 51, 52?

13          A.       I don't remember who took  
14 those photos.

15          Q.       Okay. Can you tell from 52  
16 where you were situated on the island?

17          A.       It was on the beach.

18          Q.       53, can you tell me who that  
19 is?

20          A.       That's [REDACTED]

21          Q.       54 and 55, also [REDACTED]

22          A.       That's correct.

23          Q.       69, who is that?

24          A.       That's Jeffrey Epstein.

25          Q.       Do you know who took this

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1                   HIGHLY CONFIDENTIAL AEO

2    photograph?

3           A.       I can't remember who took  
4    this photograph.

5           Q.       71, is that you?

6           A.       That's correct.

7           Q.       Were you posing for the  
8    photograph?

9           A.       Most people pose for  
10   photographs, every photograph. So I  
11   presume I was posing.

12          Q.       Do you know what [REDACTED] [REDACTED]'s  
13   line of work is?

14          A.       I think he's with modeling  
15   or something, like a modeling agent.

16          Q.       Do you know where he's  
17   based?

18          A.       I have no idea where he's  
19   based.

20          Q.       Did you meet him more than  
21   once?

22          A.       I can't remember if I met  
23   him more than once.

24          Q.       Did you have sexual contact  
25   with him?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       No.

3           Q.       Did you give him a massage?

4           A.       No.

5           Q.       Sorry.   Going back a little  
6 bit further to RANSOME 121.

7           A.       Mm-hmm.

8           Q.       Who is in that photograph?

9           A.       That's [REDACTED] and [REDACTED]

10          Q.       Okay.   So [REDACTED]'s on the  
11 left?

12          A.       That's correct.

13          Q.       And [REDACTED]'s on the right?

14          A.       That's correct.

15          Q.       Do you know what they're  
16 doing?

17          A.       I would love to know what  
18 they're doing myself, personally.

19          Q.       Did you take this  
20 photograph?

21          A.       I can't remember.

22          Q.       Turning to 123, do you know  
23 what is happening in that photograph?

24          A.       I think we were just playing  
25 around.   I don't think it was serious,

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1                   HIGHLY CONFIDENTIAL AEO

2    you know.

3           Q.       Okay.

4           A.       Just to make that clear.

5           Q.       Can I have you look at 126.

6           A.       Yeah.

7           Q.       Who is in that photograph?

8           A.       That's [REDACTED] and [REDACTED]

9           Q.       And [REDACTED] is in the  
10 background?

11          A.       That's correct.

12          Q.       On 127 --

13          A.       Mm-hmm.

14          Q.       -- who is in that  
15 photograph?

16          A.       To the right -- sorry, to  
17 the left it's myself, [REDACTED] [REDACTED]  
18 and then [REDACTED]

19          Q.       Is this on the same December  
20 trip?

21          A.       That's correct.

22          Q.       When did [REDACTED] [REDACTED] give you  
23 the disk?

24          A.       I can't remember when he  
25 gave me the disk.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you know if these  
3   photographs are ones that he took?

4           A.       They were photos that were  
5   taken during our holiday together, and  
6   they were given to me as a memento, as  
7   a present from [REDACTED] [REDACTED]

8           Q.       In person?

9           A.       I can't remember.

10          Q.       Do you recall the tortoise?

11          A.       I can't remember the  
12   tortoise.

13          Q.       Apart from [REDACTED] [REDACTED]  
14   [REDACTED] and yourself and [REDACTED] [REDACTED], do  
15   you remember anyone else being on this  
16   particular trip?

17          A.       There were -- there were  
18   quite a few people that visited the  
19   island. I don't remember their names.

20          Q.       Can I have you look at 138.

21          A.       Mm-hmm, yeah.

22          Q.       Do you know who took that  
23   photograph?

24          A.       I don't know who took that  
25   photograph.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you know when it was  
3 taken?

4           A.       It was taken that December  
5 trip that I took with Ghislaine and  
6 Jeffrey.

7           Q.       How do you know that?

8           A.       Because I remember what she  
9 was wearing. And I was there. I was  
10 there in person. Like, I was there.

11          Q.       So you saw her on the island  
12 wearing those clothes?

13          A.       I saw her on the island  
14 wearing those clothes.

15          Q.       Did you see her sitting in  
16 this position while on the island?

17          A.       I saw her with my own eyes  
18 sitting in this position. I was  
19 probably sitting next to her.

20          Q.       But you don't know if you  
21 took the photograph or someone else?

22          A.       You know what? Photos are  
23 photos. I don't remember if I took  
24 the photo or if someone else took the  
25 photo.

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1                   HIGHLY CONFIDENTIAL AEO

2                   All I remember is I was with  
3 Ghislaine on this trip. I was  
4 probably sitting next to her in this  
5 photo. I don't know who -- which  
6 specific girl took the photo.

7           Q.       Do you know if it was a girl  
8 who took the photo?

9           A.       I have no idea who took the  
10 photo. I just remember sitting there  
11 and remember being next to Ghislaine  
12 while she was wearing that outfit. I  
13 was there during that time frame.

14          Q.       RANSOME 139, who is that, if  
15 you know?

16          A.       That is [REDACTED] [REDACTED] after  
17 she had a shower, and she's in  
18 Victoria's Secret pajamas that were  
19 supplied to us.

20          Q.       They were supplied to you?

21          A.       Yes. All of the outfits --  
22 there were clothes that were provided  
23 on the island by Jeffrey Epstein,  
24 which were all Victoria's Secret  
25 clothing: bikinis, nightwear.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       You're talking about the  
3 flannel pajamas?

4           A.       Yes.

5           Q.       Page 140, do you know who  
6 took this photograph?

7           A.       I don't remember taking this  
8 photo, but I remember that very well  
9 because we are doing mosaic on that  
10 table. We were busy doing a fish. So  
11 that's what all these are apparatus  
12 are. We were doing mosaics.

13                   So I don't remember if I  
14 took that photo, but I remember I was  
15 there, because we were all doing  
16 mosaics.

17          Q.       142?

18          A.       Mm-hmm.

19          Q.       Do you remember who took  
20 that photograph?

21          A.       I can't remember -- oh, the  
22 BlackBerry. I can't remember who took  
23 all the photos when I was there. You  
24 can see the mosaics that we were doing  
25 together.



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you still have that  
3 mosaic?

4           A.       No. It was on the big table  
5 that she's sitting at, the large  
6 table. So we actually stuck the  
7 mosaic on the table.

8           Q.       143, do you know who took  
9 that?

10          A.       No. We were all there  
11 together.

12          Q.       Going through the rest, do  
13 you see any that you know who took the  
14 photo?

15          A.       No.

16                   MR. GUIRGUIS: Take your  
17 time and look at each onem.  
18 Don't just -- take your time.

19                   Can we take a break for just  
20 a minute.

21                   (Time noted: 5:06 p.m.)

22                   (Recess.)

23                   (Time noted: 5:15 p.m.)

24          Q.       Did you have a chance to  
25 look through the rest of the

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1                   HIGHLY CONFIDENTIAL AEO

2       photographs in Defendant's Exhibit 6?

3           A.       No, because I took a break,  
4       so I will continue now.

5           Q.       Sure.

6           A.       I can't remember who took  
7       these photos. It was during all the  
8       same trip.

9           Q.       It was what?

10          A.       It was during that same  
11       trip.

12          Q.       Can I have you take a look  
13       at RANSOME 154. It's one of the last  
14       few of that exhibit.

15          A.       Yes.

16          Q.       Do you know where that  
17       photograph was taken?

18          A.       I can't remember.

19          Q.       Do you know if you were  
20       there?

21          A.       I can't remember.

22          Q.       Does it appear to be inside  
23       of a shop?

24          A.       It appears that way.

25          Q.       Do you recall going to any

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1                   HIGHLY CONFIDENTIAL AEO

2       shops on that trip?

3           A.       I went everywhere with  
4       Jeffrey, so...

5           Q.       Did that include shops?

6           A.       Yes.

7           Q.       Do you recall this shop?

8           A.       There were many shops that I  
9       visited. I can't recall this specific  
10      shop.

11          Q.       Do you know who the  
12      gentleman is?

13          A.       I can't remember his name.

14          Q.       And by gentleman, I mean the  
15      person on the left.

16          A.       Thank you for clarifying  
17      that.

18                   No, I don't recall. I don't  
19      know who this Jeffrey -- Jeffrey's on  
20      the right. I don't know the name, I  
21      can't remember the name of this guy.

22          Q.       Wearing a belt?

23          A.       Trying on a belt, yeah.

24          Q.       Okay. Turning to  
25      Defendant's Exhibit 7.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes.

3           Q.       Do you recognize these  
4 photographs?

5           A.       I remember this photograph,  
6 the first one, very well.

7           Q.       What is it?

8           A.       It's a box -- it's a box of  
9 condoms that were placed around the  
10 island for the guests to use at their  
11 leisure.

12          Q.       Where on the island was this  
13 one?

14          A.       I can't remember.

15          Q.       Did you take the photograph?

16          A.       I can't remember.

17          Q.       Do you have this photograph  
18 at your house now?

19          A.       I'll have to recheck. I  
20 can't remember where this photo came  
21 from, if it was either on the disk or  
22 by myself. But it was -- I recognize  
23 the box. There were boxes like this  
24 put everywhere.

25          Q.       Did you have any photographs

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1                   HIGHLY CONFIDENTIAL AEO

2       contained on your computer?

3           A.       No.

4           Q.       Where were photographs that  
5       you gathered together to produce?

6           A.       You've got them all there.  
7       I just need to -- all the photos that  
8       I have, you guys have. So I don't  
9       know.

10          Q.       Where were they? Where did  
11       you find them?

12          A.       My photos?

13          Q.       Yes.

14          A.       In my storage.

15          Q.       Where is that?

16          A.       It was in England. It was  
17       in my private box where I keep all my  
18       photos from, you know, when I was a  
19       baby to now, so...

20          Q.       Is that with your mother?

21          A.       No, that wasn't with my  
22       mother.

23          Q.       Where is the storage in  
24       London?

25          A.       The storage was in Ramsgate.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And where did it go?

3           A.       It's now in my current  
4       residency in Spain.

5           Q.       When you gathered the photos  
6       together and gave them to your lawyer  
7       to give to us, did you gather them in  
8       Spain or in London?

9           A.       My stuff was in London and I  
10       moved to Barcelona. I was currently  
11       staying in Barcelona with [REDACTED] and  
12       we were just going to commute between  
13       St. Albans and Barcelona.

14                   When I came forward, I knew  
15       that I had photos that I had taken and  
16       I knew that I had materials.

17                   At that same time is --  
18       during that same time, I contacted  
19       Maureen Callahan. When I contacted  
20       Maureen Callahan, there were people  
21       that were following me in Barcelona,  
22       and I got scared.

23                   I then contacted my estate  
24       agent. I got my entire flat packed up  
25       in St. Albans and moved to Spain. I

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1                   HIGHLY CONFIDENTIAL AEO  
2       was too frightened to actually fly  
3       back myself and pack, so I stayed in  
4       Barcelona and a company packed my  
5       things for me and brought them to me.

6           Q.       Okay. So they were in St.  
7       Albans. You had them all packed up  
8       and sent to you in Barcelona, where  
9       you relocated?

10          A.       That's correct.

11          Q.       When you were interacting  
12       with Ms. Callahan, did you send her  
13       any photographs?

14          A.       Sorry, sorry. Who is  
15       Ms. Callahan? Sorry. I'm just really  
16       tired. I'm really bad with names.  
17       Callahan first name, please.

18          Q.       Do you know who Ms. Callahan  
19       is?

20          A.       It's really late, I've had a  
21       really long day, and I've said  
22       numerous times throughout the day that  
23       I am slightly dyslexic and I have  
24       difficulty with names.

25                   Can you just tell me

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1 HIGHLY CONFIDENTIAL AEO

2 Ms. Callahan's first name so I can  
3 answer the question, please.

4 Q. Is Ms. Callahan the name of  
5 the individual that you said worked  
6 for the New York Post?

7 A. Oh, sorry. Maureen  
8 Callahan, yes.

9 Q. Did you send Ms. Callahan  
10 any photographs?

11 A. Not of this, no. Not of  
12 this.

13 Q. Did you send her photographs  
14 of something else?

15 A. I did. I sent her a photo  
16 of [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18 A. [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]



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1 HIGHLY CONFIDENTIAL AEO

2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED] [REDACTED]

4 Q. Why did you send

5 Ms. Callahan a photograph of [REDACTED]

6 [REDACTED] [REDACTED] [REDACTED]

7 A. Because I wanted to show her

8 I was telling the truth about

9 everything. I didn't want to send a

10 journalist anything regarding Jeffrey

11 Epstein because I -- I -- well, I sent

12 her a picture of [REDACTED] [REDACTED] [REDACTED]

13 to show that I was telling my story,

14 that my story was straight from the

15 beginning, [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED], etcetera. So...

17 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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

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1                   HIGHLY CONFIDENTIAL AEO

2   [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3   [REDACTED] [REDACTED] [REDACTED]

4           Q.       Apart from the photograph

5   [REDACTED] [REDACTED] [REDACTED] [REDACTED], did you send

6   Ms. Callahan any other documents or

7   photographs?

8           A.       I can't remember.

9           Q.       Did you have contact with  
10 any other media person?

11          A.       I can't remember.

12          Q.       Did you meet with anyone  
13 from the Daily Mail?

14          A.       No.

15          Q.       From the Mirror?

16          A.       No.

17          Q.       Did you speak to anyone from  
18 the Daily Mail?

19          A.       No.

20          Q.       Anyone from the Mirror?

21          A.       No.

22          Q.       The Independent?

23          A.       No.

24          Q.       The Guardian?

25          A.       No.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       When you got these boxes of  
3   items from St. Albans and you looked  
4   at them while you were in Barcelona;  
5   is that right?

6           A.       I --

7                   MR. GUIRGUIS:   Objection.

8           A.       I looked at them -- I  
9   vaguely went through the photos in St.  
10   Albans.   I knew what was there.   Yeah,  
11   I -- they were there, so I saw them.  
12   I went through my photos, like all my  
13   memorabilia that had been in storage.  
14   But that's about it.

15          Q.       And you selected photographs  
16   to send to your lawyers to give to us,  
17   correct?

18          A.       I was asked to -- well I  
19   just provided every -- all the  
20   evidence that I had.

21          Q.       When did do you that?

22                   MR. GUIRGUIS:   I'm going to  
23   object.   If you're talking about  
24   a communication between client  
25   and counsel -- is that what

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1                   HIGHLY CONFIDENTIAL AEO

2                   you're asking for?

3                   MS. MENNINGER: No. I'm  
4                   asking when did you provide all  
5                   of your evidence, which is what  
6                   she said that she had.

7                   MR. GUIRGUIS: The photos --  
8                   you mean when she provided them  
9                   to her counsel?

10                  MS. MENNINGER: Yes.

11                  Q.       When did you provide them to  
12                  your counsel?

13                  MR. GUIRGUIS: Objection.  
14                  Do not answer.

15                  Q.       Did you receive a subpoena  
16                  in this case?

17                  A.       I don't know what a subpoena  
18                  is.

19                  MS. MENNINGER: Let's mark  
20                  Defendant's Exhibit 8.

21                  (Defendant's Exhibit 8,  
22                  Notice of Service of Rule 45  
23                  Subpoena and Notice of Deposition  
24                  of Sarah Ransome, was marked for  
25                  identification.)

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Have you seen this document  
3 before?

4           A.       Let me just have a look,  
5 okay. I don't remember.

6           Q.       Have you ever seen this  
7 document before?

8                   MR. GUIRGUIS: Objection,  
9 asked and answered.

10                  MS. MENNINGER: I'm sorry.  
11 I didn't hear an answer.

12           A.       I've seen various papers. I  
13 remember specifically seeing the  
14 depositions. There's been millions of  
15 documents. I can't remember which  
16 specific documents I've seen.

17           Q.       Okay. If I could have you  
18 turn to the last three pages, where it  
19 says "Documents to be Produced."

20           A.       Mm-hmm.

21           Q.       Have you seen that list  
22 before?

23           A.       Yes, I have.

24           Q.       Did you conduct a search of  
25 your records to produce documents?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Yes, I believe that I  
3       produced every single document I can.

4           Q.       After looking at this list,  
5       did you go back and look through your  
6       photographs in Barcelona?

7           A.       As I said, I looked at  
8       everything I had during that time  
9       frame and I produced everything I can  
10      during that time frame that I was with  
11      Jeffrey.

12          Q.       Just tell me what you did in  
13      order to make sure you had produced  
14      everything that was called for in this  
15      list.

16          A.       Okay. So I went through a  
17      box of about over 5,000 photos that I  
18      had, and I went through every single  
19      photo, every single disk, everything  
20      that I had.

21                   I went through all my  
22      emails.

23                   I tried to look for the  
24      BlackBerry sim card, which I had hoped  
25      that I had kept, which had all

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1                   HIGHLY CONFIDENTIAL AEO  
2       Ghislaine's messages on and Jeffrey's  
3       and [REDACTED]'s, and stupidly I misplaced  
4       that, which is really annoying.

5                   But I myself, you know,  
6       considering my objective is to get  
7       these people and get justice for the  
8       abuse that Ghislaine caused me -- and  
9       Jeffrey -- I have given as sufficient  
10      evidence that I have.

11           Q.       Did you look for all  
12      photographs taken by you or containing  
13      any image of you at or near any home,  
14      business, private vehicle or any other  
15      property owned or controlled by  
16      Jeffrey Epstein, as indicated in  
17      paragraph 7?

18           A.       Yes.

19           Q.       Likewise in paragraph 8, did  
20      you look for any photographs that  
21      depict any home, business, private  
22      vehicle or any other property owned or  
23      controlled by Jeffrey Epstein?

24           A.       Yes.

25           Q.       And you did that after

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1                   HIGHLY CONFIDENTIAL AEO

2       reviewing this list of documents?

3           A.       Yeah, I mean, I received the  
4       list and I've complied with  
5       everything. I have given absolutely  
6       everything that I can to you guys.

7           Q.       Have you given all of your  
8       passports, travel visas or permissions  
9       to live, work or study in other  
10      country?

11          A.       I haven't given my current  
12      passports, but I've given everything  
13      that I have; documents, passports that  
14      I had during, commercial plane  
15      tickets.

16          Q.       Do you have any visas?

17          A.       I have a visa coming here,  
18      but that's the only visa that I have.

19          Q.       Do you have any visa  
20      applications?

21          A.       No.

22          Q.       Do you have any other plane  
23      tickets or boarding passes for the  
24      period 2006 to 2007?

25          A.       No.



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Turning back to Defendant's  
3   Exhibit 7, these photographs, do you  
4   know what the second photograph  
5   represents?

6           A.       Yes, that's me playing with  
7   Ghislaine's dog, a Yorkshire Terrier.

8           Q.       Where are you in this  
9   picture?

10          A.       I was in the girls' bedroom  
11   where we all slept, and I was on my  
12   bed playing with Ghislaine's dog.

13          Q.       When was this photograph  
14   taken?

15          A.       I can't remember.

16          Q.       Was it the same trip as  
17   Defendant's Exhibit 6?

18          A.       I can't remember.

19          Q.       Okay. Do you know who took  
20   the photograph in 205?

21          A.       I can't remember.

22          Q.       206?

23                   MR. GUIRGUIS: Objection to  
24   form.

25          A.       I can't remember.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       207?

3                   MR. GUIRGUIS:  Objection to  
4           form.

5           A.       Can't remember.

6           Q.       Who is depicted in 208?

7           A.       ██████████

8           Q.       And?

9           A.       Oh, and me.  That's me.

10          Q.       And 209?

11          A.       Sorry.  That's me, ██████████

12          ██████ ██████, and one of Jeffrey's staff  
13          members in the background.

14          Q.       Turning to 213, is that you?

15          A.       Yes, that's me.

16          Q.       And where are you located?

17          A.       I'm trying to remember  
18          specifically where that is on the  
19          island.  I think it's near the main  
20          house, there was a -- yeah, there was  
21          a fountain near the main house.

22          Q.       Do you know whether you took  
23          this?

24          A.       I don't remember.

25          Q.       Do you know whether you had

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1                   HIGHLY CONFIDENTIAL AEO

2       this photograph on the disk?

3           A.       I think these were one of my  
4       photos.

5           Q.       Was it in hard copy, like an  
6       actual print?

7           A.       I can't remember. I have to  
8       double check if there are more copies.  
9       But I think -- yeah, I'm pretty sure  
10      this is a hard copy.

11          Q.       Does it have a back, like  
12      when it was developed or printed?

13          A.       I can check.

14          Q.       Is it back in Barcelona?

15          A.       No.

16          Q.       Where are these photographs?

17          A.       I have given all the  
18      photographs to my lawyers.

19          Q.       Okay. How did you do that?  
20      By handing them over in person?  
21      Sending them by mail?

22          A.       Handing them over in person.

23          Q.       Was this some type of photo  
24      shoot represented in RANSOME 214, 215,  
25      216?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Sorry. 214, this is not a  
3 photo shoot. We were just messing  
4 around on the island.

5           Q.       Do you know who you were  
6 messing around with?

7           A.       We were all having fun  
8 together.

9           Q.       Were there photographs of  
10 other people taken around the same  
11 time that you have?

12          A.       I have given all the photos  
13 that I have.

14          Q.       In other words, if you were  
15 messing around with [REDACTED] at this  
16 time and there's a photo of [REDACTED]  
17 that you have, did you provide that?

18          A.       I provided every single  
19 photograph that I have.

20          Q.       And 218, was that a photo  
21 shoot?

22          A.       That was me when I was  
23 naked, actually, and I had a towel  
24 around me. So I think I just had a  
25 massage by Jeffrey, because I was

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1                   HIGHLY CONFIDENTIAL AEO

2       naked underneath the towel.

3           Q.       Also 219 and 220?

4           A.       Yep.

5           Q.       Those were just after a  
6       massage?

7           A.       Yeah. You can tell I look  
8       really, really happy to be out of  
9       there, so...

10          Q.       Do you know which trip that  
11       was on?

12          A.       I can't remember which trip.

13          Q.       And page RANSOME 221, who is  
14       in that photograph?

15          A.       Myself, [REDACTED] and [REDACTED] [REDACTED],  
16       and a staff member in the background.

17          Q.       Do you know what's happening  
18       in 223?

19          A.       Oh, no. Yes. So Jeffrey  
20       provided cosmetics for all the girls.  
21       We had to look our best. So that was  
22       a Crème de la Mer facial mask that he  
23       regularly gave to the girls so their  
24       skin was nice. We had top-line  
25       cosmetics in our bathroom to use at

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1                   HIGHLY CONFIDENTIAL AEO

2       our disposal.

3           Q.       So in 223 and 224 you're  
4       doing a facial mask?

5           A.       I'm attempting to do a  
6       facial.   It's not going that well.

7           Q.       And going to 229, do you  
8       know where that was taken?

9           A.       That was on Jeffrey's  
10      speedboat to -- going to the island.

11          Q.       Do you know when?

12          A.       I don't recall which date  
13      that was.

14          Q.       Did you have any contact  
15      with the mail on Sunday?

16                   MR. GUIRGUIS:   Objection.

17           Huh?

18          Q.       Did you ever have any  
19      contact with the mail on Sunday?

20          A.       No.

21                   MR. GUIRGUIS:   You mean the  
22      mail as in postage?   I'm sorry.

23                   MR. PAGLIUCA:   The  
24      newspaper.

25          A.       No, no, I haven't had

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1                   HIGHLY CONFIDENTIAL AEO

2       correspondence with them, no.

3           Q.       Apart from Ms. Callahan,  
4       have you had contact with any member  
5       of the press?

6           A.       Oh, I contacted [REDACTED]  
7       [REDACTED] because [REDACTED] [REDACTED] [REDACTED]  
8       [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9           Q.       Okay. Did you have any  
10       contact with any other member of the  
11       press?

12          A.       No.

13          Q.       When was the last time that  
14       you saw Ghislaine Maxwell?

15          A.       In New York, before I left  
16       in 2007.

17          Q.       How long before you left?

18          A.       I can't remember.

19          Q.       What time of year was it?

20          A.       When I left?

21          Q.       Yes.

22          A.       It was the end of April.

23          Q.       How do you know that?

24          A.       Because I am -- on some of  
25       the emails, I wanted to go home.

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1                   HIGHLY CONFIDENTIAL AEO

2       Actually, back to my mom.

3           Q.       When's the last time you  
4       spoke to Ghislaine Maxwell?

5           A.       Before I left New York.

6           Q.       Okay. Do you know how long  
7       before you left?

8           A.       I can't remember.

9           Q.       Tell me what you recall  
10       about the last time you saw Ghislaine  
11       Maxwell.

12          A.       I can't remember.

13          Q.       Where it was?

14          A.       I can't remember my last  
15       interaction with Ghislaine.

16          Q.       Or the last time you spoke  
17       with her?

18                   MR. GUIRGUIS: Objection,  
19       asked and answered.

20          A.       I can't remember the last  
21       time I spoke to her. Yeah, I don't  
22       remember the specifics.

23          Q.       Were you living with [REDACTED] at  
24       the time you last spoke to Ghislaine?

25          A.       Yes.



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1 HIGHLY CONFIDENTIAL AEO

2 Q. What did she say to you when  
3 you last spoke to her --

4 MR. GUIRGUIS: Objection,  
5 asked and answered.

6 Q. -- when you were living with

7 [REDACTED]

8 MR. GUIRGUIS: Objection,  
9 asked and answered.

10 A. I can't remember.

11 Q. Did you speak to her about  
12 FIT?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. I had spoken to her numerous  
16 times about FIT.

17 MS. MENNINGER: Counsel,  
18 when did I already ask her, did  
19 you speak to her about FIT.

20 MR. GUIRGUIS: You've asked  
21 her --

22 THE WITNESS: Several times.

23 MS. MENNINGER: I'm not  
24 talking to you.

25 MR. GUIRGUIS: Okay.

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1                   HIGHLY CONFIDENTIAL AEO

2                   THE WITNESS: That was rude.

3                   MR. GUIRGUIS: It was, and  
4 I'm not going to answer her  
5 question now.

6                   You can proceed, Counsel.

7                   MS. MENNINGER: When did I  
8 last ask her about --

9                   MR. GUIRGUIS: I'm not going  
10 to answer your question. I'm not  
11 being deposed. I'm not arguing  
12 objections with you. You have  
13 asked her about it before; that's  
14 why I made my objection.

15                  You can proceed with your  
16 questioning whenever you like,  
17 Counsel.

18                  MS. MENNINGER: Thank you.

19                  MR. GUIRGUIS: Feel free to  
20 search the transcript later.

21                  MS. MENNINGER: I would like  
22 to mark as Defendant's Exhibit 8.

23                  (Defendant's Exhibit 8,  
24 Bates stamped RANSOME\_000004, was  
25 marked for identification.)

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you recognize Defendant's  
3 Exhibit 8?

4           A.       Yes, I do.

5           Q.       What is it?

6           A.       They're emails.

7           Q.       Did you find these emails  
8 and produce them?

9           A.       That's correct.

10          Q.       Where did you find them?

11          A.       On my old email account that  
12 I had during that time.

13          Q.       What was your old email  
14 account?

15          A.       [REDACTED]

16          Q.       When did you stop using that  
17 email account?

18          A.       A guess a year or a few  
19 months after. I can't recall when I  
20 stopped using it.

21          Q.       Do you see on the first page  
22 where it says RANSOME 004, there are  
23 two emails in the chain which are  
24 visible?

25          A.       That's correct.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       And did you produce the  
3 other emails between those two that  
4 are not visible?

5           A.       Yes.

6           Q.       When did you do that?

7           A.       The same time I provided all  
8 the emails originally.

9           Q.       Okay. So you believed that  
10 you produced six emails of  
11 conversation between yourself and

12           ██████████ ██████████

13                   MR. GUIRGUIS: I'm going to  
14 object and just ask for  
15 clarification.

16                   I'm not trying to give you a  
17 hard time on this one. When you  
18 say produced, you're asking the  
19 witness if she provided it to her  
20 attorneys, right? Because  
21 obviously the attorneys produced  
22 the documents in this case.

23                   MS. MENNINGER: Correct.

24                   MR. GUIRGUIS: So just --  
25 she didn't produce anything,

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1                   HIGHLY CONFIDENTIAL AEO

2                   obviously.

3                   So she's asking you did you  
4                   collect this email and give it to  
5                   the lawyers, I guess is the  
6                   question.

7                   A.       Yeah, I collected all --  
8                   all -- everything I had, I gave to my  
9                   lawyers.

10                  Q.       Okay. So you believe you  
11                  gave six emails between yourself and  
12                  [REDACTED] [REDACTED] to your attorneys?

13                  A.       Yes, I gave all my evidence.

14                  Q.       Okay. And --

15                  MR. GUIRGUIS: I'm going to  
16                  object to that last question also  
17                  as misrepresenting the testimony.

18                  MS. MENNINGER: What was  
19                  misrepresenting what testimony?

20                  MR. GUIRGUIS: You're saying  
21                  that she gave six emails.

22                  MS. MENNINGER: Well, let's  
23                  go back, then, and get the  
24                  testimony right.

25                  Q.       On RANSOME 004, how many

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1                   HIGHLY CONFIDENTIAL AEO

2       emails between yourself and [REDACTED]

3       [REDACTED] do you see total?

4                   There's one at 1:04 a.m.,  
5       correct?

6                   MR. GUIRGUIS: Counsel,  
7       you're doing the exact thing that  
8       I just tried to avoid confusion  
9       on, right?

10                  There's a difference between  
11       what was produced to you -- and  
12       apparently and you're saying that  
13       six emails were produced to  
14       you --

15                  MS. MENNINGER: No, I was  
16       not saying that.

17                  MR. GUIRGUIS: -- which  
18       she's providing to her counsel.

19                  MS. MENNINGER: No, I'm not  
20       saying that. So I'm trying to  
21       get it straight now.

22       Q.       There's an email indicated  
23       on the first page from [REDACTED] to you  
24       at 1:04 a.m. on February 3rd, 2007,  
25       correct?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Mm-hmm.   Yes.

3           Q.       And you can read the text of  
4   that email, correct?

5           A.       Yes, I can.

6           Q.       And the next email down says  
7   "Sarah Ransome" at 4:07 -- at 4:01  
8   p.m.

9           A.       Mm-hmm.

10          Q.       Can you read that email?

11          A.       No, because it's on Yahoo.  
12   It's a technological thing. You can't  
13   read all emails.

14          Q.       So did you produce the  
15   February '04, '07, 4:01 p.m. email  
16   from yourself to [REDACTED] [REDACTED] to  
17   your attorneys?

18                   MR. GUIRGUIS: Objection to  
19   the use of the word produce.

20          A.       I've given all my email  
21   correspondence to my lawyers.

22          Q.       Did you give that email to  
23   your lawyer?

24          A.       I've given all my emails to  
25   my lawyers.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Okay. The next email down  
3       says "Sarah Ransome, February 5, 2007,  
4       at 10:09 p.m."

5                   Can you read the text of  
6       that email on this document?

7           A.       Mm-hmm.

8           Q.       What does the 10:09 p.m.  
9       email say?

10          A.       As I've specified before,  
11       this is a screenshot, okay, of the  
12       actual Yahoo email. This is a  
13       screenshot. So technically I can't  
14       read that anyways, seeing as it's a  
15       screen shot.

16          Q.       Okay.

17          A.       This isn't a computer. I  
18       can't tap into that email on a page  
19       because it's a screen shot.

20          Q.       Did you give a February 6th,  
21       '07, 2:00 a.m. email between yourself  
22       and [REDACTED] [REDACTED] to your attorneys?

23          A.       I have handed all over my  
24       evidence to my attorneys.

25          Q.       Did you give a February 8,



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1                   HIGHLY CONFIDENTIAL AEO

2       2007, 9:12 p.m. email from yourself to  
3       [REDACTED] [REDACTED] to your attorneys?

4           A.       I have given all my evidence  
5       to my attorneys.

6                   MS. MENNINGER: I'm going to  
7       show you Defendant's Exhibit 10.

8                   (Defendant's Exhibit 10,  
9       Bates stamped RANSOME\_000006, was  
10      marked for identification.)

11          Q.       Do you recognize Defendant's  
12      Exhibit 10?

13          A.       Yes.

14          Q.       What is it?

15          A.       It's an email correspondence  
16      between [REDACTED] [REDACTED] and myself.

17          Q.       On the second page, RANSOME  
18      0008, do you see other emails with  
19      headings but no text visible in the  
20      screenshot?

21          A.       Mm-hmm.

22          Q.       Did you give each one of  
23      those emails to your attorneys?

24          A.       I have given all my  
25      correspondence to my attorneys.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Do you see in the "Smart  
3 View" column on the left side a folder  
4 named "[REDACTED] [REDACTED]"?

5           A.       Yes, I do.

6           Q.       Does that folder contain  
7 your correspondence with [REDACTED]

8 [REDACTED]

9           A.       I didn't even know that  
10 folder was there, but I presume so,  
11 which is why I would have created it  
12 in the first place.

13          Q.       And it also shows a  
14 substantial number of documents in  
15 your Inbox.

16          A.       Yes.

17          Q.       Did you search your Inbox  
18 for documents responsive to the  
19 subpoena that I showed you a little  
20 while ago?

21          A.       I did. I wanted to be  
22 thorough with my research, so I,  
23 during that time frame, went through  
24 every single email.

25          Q.       You went through each one?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       I went through all of my  
3 emails to make sure I gave all my  
4 evidence to my lawyers.

5           Q.       Did you search for keywords  
6 or did you just read each email?

7           A.       I read each email.

8           Q.       And did you print out each  
9 email?

10          A.       I didn't print out. I saved  
11 them to a USB stick.

12          Q.       All of them or just the ones  
13 that you thought were needed?

14          A.       Just the ones that were  
15 for -- just anything related to  
16 Jeffrey, I sent over.

17          Q.       And I think you testified  
18 earlier you believe you still have  
19 your FIT application in an email?

20          A.       I haven't read it. I'm  
21 assuming I have it.

22                   MS. MENNINGER: I want to  
23 show you Defendant's Exhibit 11.

24                   (Defendant's Exhibit 11,  
25 Maureen Callahan article, was

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1                   HIGHLY CONFIDENTIAL AEO

2                   marked for identification.)

3           A.       Oh, it's 9th of October,  
4       sorry.

5           Q.       Do you recognize this  
6       document?

7           A.       Let me go to the last  
8       sentence. That catchphrase that I  
9       mentioned earlier, as I said earlier,  
10      I couldn't remember the contents of  
11      the article earlier. I do apologize,  
12      I got the date wrong from the 16th.  
13      It was actually the 9th of October. I  
14      couldn't remember the specific date.

15                   I remember the specific  
16      statement that really struck a chord  
17      with me, which was, "The true number  
18      of Epstein's victims will never be  
19      known."

20          Q.       So you believe this is the  
21      document by Maureen Callahan that you  
22      read last October that caused you to  
23      come forward?

24          A.       I'm presuming so, because  
25      I've gone straight to the bank, and

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1                   HIGHLY CONFIDENTIAL AEO

2       the sentence that I told you that I  
3       remembered is this.    So I'm assuming,  
4       yes, that it's the same.

5           Q.       And this article had a big  
6       impact on you because it caused you to  
7       come forward, I think you testified  
8       earlier; is that correct?

9           A.       That's correct.

10          Q.       All right.   Do you also see  
11       on that last page, just right where  
12       you were, there's a little box on the  
13       left hand side.   Can you read that out  
14       loud, beginning "Today Jeffrey  
15       Epstein..."

16                   Do you see that in bold  
17       letters on that last page?

18          A.       Oh.

19          Q.       Can you just read that  
20       sentence to us?

21          A.       "Today Jeffrey Epstein is a  
22       free man, albeit one who routinely has  
23       civil lawsuits brought against him by  
24       young women out of court."

25                   MS. MENNINGER:   Okay.

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1                   HIGHLY CONFIDENTIAL AEO

2                   Defendant's Exhibit 12.

3                   (Defendant's Exhibit 12,  
4                   website printout titled How to  
5                   Apply, was marked for  
6                   identification.)

7                   Q.       Do you recognize this  
8                   document?

9                   A.       I've seen it before, yes.

10                  Q.       And what do you recognize it  
11                  be?

12                  A.       It's the application how you  
13                  apply to FIT.

14                  Q.       It talks about students  
15                  applying to different parts of the  
16                  school, including arts and design or  
17                  business and technology.

18                         Do you recall if you were  
19                  applying to a particular area at FIT  
20                  or a general admission?

21                  A.       I wanted to specialize in  
22                  fashion designing.

23                  Q.       Do you know if that was a  
24                  special area?

25                  A.       Yes, it was.   FIT's the

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1                   HIGHLY CONFIDENTIAL AEO

2       financial -- fashion school, so yeah.

3           Q.       Did you visit the building  
4       where FIT is located?

5           A.       Yes, I did.

6           Q.       Did you attend classes  
7       there?

8           A.       No.

9           Q.       I mean did you visit a  
10       class. I know you didn't enroll, but  
11       did you visit a class?

12          A.       No, I didn't. But I went to  
13       the university, had a look around.

14          Q.       Did you take a tour?

15          A.       Not per se. I mean, I went  
16       around, I looked at the university. I  
17       didn't go on a big personalized tour  
18       with a specific person, no.

19          Q.       Did you talk to any of the  
20       teachers there?

21          A.       No, I didn't.

22          Q.       Do you recall there being  
23       multiple steps for applications to  
24       FIT?

25          A.       There's multiple steps on

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1                   HIGHLY CONFIDENTIAL AEO

2   any college application form.

3           Q.       Do you remember what those  
4   steps were when you were applying?

5           A.       No.

6           Q.       Do you remember an original  
7   application which had details?

8           A.       I can't remember the  
9   original application form, no.

10          Q.       Do you remember there being  
11   a separate essay portion?

12          A.       Yes, I do remember that.

13          Q.       Do you remember a separate  
14   portion that relates to students who  
15   are applying who are not U.S.  
16   citizens?

17          A.       I can't remember that. I  
18   can't remember the specific form.

19          Q.       Do you remember filling out  
20   any special paperwork for someone who  
21   was applying who was not a U.S.  
22   citizen?

23          A.       No, there was no paperwork  
24   as such for that. Jeffrey Epstein was  
25   sorting that out for me with his



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1                   HIGHLY CONFIDENTIAL AEO

2       connections at FIT.

3           Q.       So you don't believe you  
4       filled that part out?

5                   MR. GUIRGUIS:   Objection.

6           A.       I said I can't remember  
7       filling that part out.

8           Q.       Do you remember getting a  
9       copy of your transcript from Queen  
10      Margaret University?

11          A.       I haven't got my transcripts  
12      yet, but I can get them.

13          Q.       Do you remember submitting  
14      them to FIT?

15          A.       I can't remember.

16          Q.       Did you get a degree from a  
17      school in Edinburgh, high school?

18          A.       So I finished all my high  
19      school qualification, which, you know,  
20      my grades were good enough to get into  
21      psychology and sociology in Edinburgh.

22          Q.       What was the name of your  
23      high school?

24          A.       Grantown Grammar School.

25          Q.       Did you get a transcript

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1                   HIGHLY CONFIDENTIAL AEO

2       from that school to provide to FIT?

3           A.       I think I was in the process  
4       of getting my transcripts from Queen  
5       Margaret. I did have a copy of my  
6       high school grades as well. When you  
7       fill out an application, you submit  
8       all your grades, high school.

9           Q.       And that's the one in  
10      Scotland?

11          A.       Yes, that's correct.

12                 MS. MENNINGER: I think I've  
13      only got a couple more questions,  
14      but I got my piles messed up.  
15      Can we take a two-minute break  
16      and I can get organized and  
17      finished.

18                 (Time noted: 5:54 p.m.)

19                 (Recess.)

20                 (Time noted: 6:07 p.m.)

21                 MS. MENNINGER: I'm going to  
22      mark a new exhibit Defendant's  
23      Exhibit 13.

24                 (Defendant's Exhibit 13,  
25      Bates stamped RANSOME\_000007 was

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1                   HIGHLY CONFIDENTIAL AEO

2                   marked for identification.)

3           Q.       Do you recognize this  
4 document?

5           A.       Yes, I do.

6           Q.       What is it?

7           A.       It was an email sent to my  
8 friend [REDACTED]

9           Q.       Is that different than [REDACTED]  
10 that you were with on the island?

11          A.       I was never with [REDACTED] on the  
12 island. It was [REDACTED]

13          Q.       Do you remember testifying  
14 about someone named [REDACTED]

15          A.       [REDACTED] was my friend in New  
16 York.

17          Q.       Is that the same person you  
18 were writing here, or is that a  
19 different person?

20          A.       It's the same person; it's  
21 just I called her [REDACTED] It's a [REDACTED]  
22 [REDACTED] name. She's [REDACTED] [REDACTED]

23          Q.       How did you know [REDACTED]

24          A.       I met her in New York.

25          Q.       Do you know whether you paid

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1                   HIGHLY CONFIDENTIAL AEO

2       for your plane ticket to come back to  
3       New York from South Africa in February  
4       of '07?

5           A.       I didn't pay for my ticket.

6           Q.       You did not?

7           A.       No.

8           Q.       Do you see in your email  
9       exchange in Defendant's Exhibit 13  
10      that you wrote to [REDACTED] on February 8th  
11      of '07, "Not going to Miami anymore,  
12      clearly, and have to pay for me flight  
13      back."

14                   It's in the second paragraph  
15      towards the bottom.

16          A.       Mm-hmm.

17          Q.       Did you write that?

18          A.       Yes.

19          Q.       But you did not, in fact,  
20      pay for your flight back?

21          A.       No.

22          Q.       Do you know what you meant  
23      by "Not going to Miami anymore,  
24      clearly..."?

25          A.       I can't remember what that

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1                   HIGHLY CONFIDENTIAL AEO  
2       whole Miami thing was about. It never  
3       came about, so I can't remember the  
4       specific details on Miami. But it was  
5       via Jeffrey Epstein.

6           Q.       Okay. How did it happen  
7       that you were writing, "I'm going to  
8       have to pay for me flight back," but  
9       you did not, in fact, pay for your  
10      flight back?

11          A.       Because Jeffrey Epstein and  
12      I had a fight about my weight. So  
13      that was probably during the argument,  
14      the time frame that I had the argument  
15      with Jeffrey. He said that he refused  
16      to pay for my flight back if I didn't  
17      get down to 52 kilograms.

18          Q.       And how did it come about  
19      that you did not pay for your flight  
20      back?

21          A.       I carried on losing weight  
22      to try and get to the goal that  
23      Jeffrey and Ghislaine had set for me,  
24      which is 52 kilograms.

25          Q.       How does that relate to

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1                   HIGHLY CONFIDENTIAL AEO

2       payment for a flight?

3                   MR. GUIRGUIS:   Objection.

4           A.       Well, I didn't pay for that  
5       flight because Jeffrey was financing  
6       me, so I wouldn't have had the money  
7       to pay for my own flight back.

8           Q.       But you said you were "going  
9       to have to pay for my flight back,"  
10      right?

11          A.       That's correct.

12          Q.       And then what changed?

13                  MR. GUIRGUIS:   Objection,  
14      asked and answered.

15          A.       I made up with Jeffrey. I  
16      tried to meet my target weight of  
17      52 kilograms.

18          Q.       And how did you make up with  
19      him?

20          A.       I can't remember if it was  
21      telephone call or email or message,  
22      but there were various phone calls  
23      that were made to my family home from  
24      Ghislaine and Jeffrey during that time  
25      frame.

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1                   HIGHLY CONFIDENTIAL AEO

2                   It was a very delicate time  
3 because my family were up in arms the  
4 fact I was told to be 52 kilograms,  
5 which is not -- it can't be achievable  
6 with my body frame, and they saw me  
7 getting very ill.

8                   And I didn't have the funds  
9 to buy a flight back, so I had to do  
10 what Ghislaine and Jeffrey told me do.

11           Q.       What did you do?

12           A.       Continue to lose weight.

13           Q.       Did you see any medical  
14 professionals while you were in South  
15 Africa?

16           A.       No.

17           Q.       How did you communicate to  
18 Jeffrey that you had decided to  
19 continue losing weight?

20           A.       So Jeffrey, Ghislaine,  
21 again, we all corresponded by  
22 telephonic call, BBM, message, my  
23 house phone. I decided to lose  
24 weight. I was given an ultimatum that  
25 either I do it or I'm finished. At

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1                   HIGHLY CONFIDENTIAL AEO

2       that point I had no option.

3           Q.       If you wanted the flight  
4       back.

5           A.       If I wanted the flight back.  
6       I had all my stuff in New York, I had  
7       my life in New York, I was going to  
8       FIT.

9                   I didn't have any finances;  
10       Jeffrey was funding me. So I was  
11       stuck. I either had to do what  
12       Ghislaine and Jeffrey told me do or I  
13       was stuck, really.

14          Q.       You were stuck at your  
15       father and stepmother's house in South  
16       Africa, where you grew up?

17          A.       I didn't grow up with my  
18       father and my stepmother.

19          Q.       You grew up in South Africa?

20          A.       I grew up in Johannesburg.

21          Q.       When you say you were stuck,  
22       you're describing a time you were in  
23       South Africa?

24          A.       I'm describing a time I was  
25       on holiday visiting my family, that



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1                   HIGHLY CONFIDENTIAL AEO

2   Jeffrey paid for.

3           Q.       Okay. Did you finish your  
4   answer?

5           A.       Sorry, I just read here.  
6   I'm describing a time that I was on  
7   holiday visiting my family, that was  
8   paid for by Jeffrey and Ghislaine.  
9   They financed my ticket. They  
10   financed every ticket. They financed  
11   my whole lifestyle.

12          Q.       Ghislaine financed your  
13   ticket?

14          A.       Well, they were one entity.  
15   Ghislaine is Jeffrey's right-hand  
16   woman. They --

17          Q.       When did Ghislaine finance  
18   this ticket?

19          A.       It was through Jeffrey's  
20   company that she worked with.

21          Q.       Did you correspond by email  
22   with Ghislaine about financing this  
23   ticket?

24          A.       No.

25          Q.       You searched for emails with

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1                   HIGHLY CONFIDENTIAL AEO

2       yourself and Ghislaine, correct?

3           A.       That's correct.

4           Q.       And you found none, correct?

5           A.       That's correct.

6           Q.       You found emails between  
7       yourself and [REDACTED] [REDACTED] about the  
8       plane ticket back, correct?

9           A.       That's correct.

10          Q.       But none with Ghislaine?

11          A.       I never said once today that  
12       I had email communication with  
13       Ghislaine.

14          Q.       But you just said that  
15       Ghislaine financed your holiday in  
16       South Africa. And what is your basis  
17       for saying that?

18                   MR. GUIRGUIS: Objection.

19               She did not say that Ghislaine  
20               financed it.

21          Q.       What is your basis for  
22       referring to Ghislaine financing your  
23       holiday in South Africa?

24                   MR. GUIRGUIS: Objection.

25          A.       So Ghislaine is Jeffrey's

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1                   HIGHLY CONFIDENTIAL AEO

2       right-hand man, so she -- so we report  
3       to her. I told them I wanted to go  
4       and see my family. They paid for my  
5       flight.

6           Q.       You told them when they were  
7       together in the same place?

8           A.       I can't remember the  
9       specific location. I just wanted to  
10      go on holiday to see my family, which  
11      Ghislaine and Jeffrey paid for.

12          Q.       How did Ghislaine pay for  
13      it?

14          A.       I don't know. You should  
15      ask Ghislaine.

16          Q.       Did she write a check?

17          A.       You should ask Ghislaine.

18          Q.       Did she put it on a credit  
19      card?

20                   MR. GUIRGUIS: Objection.

21          A.       You should ask Ghislaine.

22          Q.       Do you have any idea how  
23      Ghislaine Maxwell paid for your trip  
24      to South Africa?

25                   MR. GUIRGUIS: Objection.

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       You should ask Ghislaine.

3           Q.       Is that an answer?

4                   MR. GUIRGUIS:  Objection.

5           Q.       Do you have an answer?

6                   MR. GUIRGUIS:  Objection.

7           A.       You should ask Ghislaine how  
8 she funded my ticket.

9           Q.       I appreciate the tip.

10                   Do you have any information  
11 inside of your head about how  
12 Ghislaine financed your trip to South  
13 Africa?

14                   MR. GUIRGUIS:  Counsel, she  
15 has repeatedly stated that she  
16 does not know.  You keep asking  
17 her the same question.

18                   MS. MENNINGER:  No, she has  
19 repeated to he me that she  
20 needed -- I needed to ask my  
21 client.

22                   MR. GUIRGUIS:  Hold on.

23                   "QUESTION:  Ghislaine funded  
24 your ticket?

25                   "ANSWER:  Well, she was his

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1                   HIGHLY CONFIDENTIAL AEO

2                   right-hand...

3                   "QUESTION:   When did  
4                   Ghislaine finance this ticket?

5                   "ANSWER:   Well, it was  
6                   through Jeffrey's company that  
7                   she worked with."

8                   Are you asking a different  
9                   question, Counsel?   Am I  
10                  misunderstanding?

11                  MS. MENNINGER:   Yeah, you  
12                  are.

13                  MR. GUIRGUIS:   Please.

14                  MS. MENNINGER:   Can you read  
15                  the question that I asked.

16                  (Requested portion of the  
17                  record was read back.)

18                  A.       In my head, I can't remember  
19                  how she financed, how she and Jeffrey  
20                  financed.

21                  Q.       Did you see any invoice paid  
22                  by Ghislaine for your ticket?

23                  A.       No.   But a ticket was  
24                  produced which enabled me to fly back  
25                  to my family, so a ticket was produced

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1                   HIGHLY CONFIDENTIAL AEO

2       by Ghislaine and Jeffrey in order for  
3       me to fly home to see my family.

4           Q.       How did Ghislaine produce a  
5       ticket to you?

6           A.       I can't remember.

7           Q.       Did it come by email?

8                   MR. GUIRGUIS:   Objection.

9           A.       I've provided all the emails  
10       that I have.

11          Q.       That's not the question.

12                   Did the ticket get produced  
13       to you by Ghislaine by email?

14                   MR. GUIRGUIS:   Objection.

15          A.       No.

16          Q.       Did it get sent by a courier  
17       to you from Ghislaine?

18                   MR. GUIRGUIS:   Objection.

19          A.       I can't remember how I  
20       received the ticket specifically.

21          Q.       Your final line to [REDACTED] is,  
22       "You must save some partying energy  
23       for me when I come back.   Lots of  
24       love, Sarah."

25                   Correct?

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1                   HIGHLY CONFIDENTIAL AEO

2           A.       Mm-hmm.

3           Q.       Is that right?

4           A.       Mm-hmm.

5           Q.       In the first paragraph, do  
6   you advise Sarah, "Still very loved  
7   up, so much so that he asked me to  
8   move in with him and I accepted. All  
9   good," exclamation point, exclamation  
10   point, exclamation point -- well,  
11   about eight of them, or ten.

12          A.       Mm-hmm.

13          Q.       Is that what you wrote?

14          A.       Yes, that's what you wrote.

15          Q.       Is that true?

16          A.       Yes.

17          Q.       Looking back at Defendant's  
18   Exhibit 8, which you testified earlier  
19   were your communications with [REDACTED]  
20   [REDACTED] or some of them --

21          A.       That's Exhibit 9.

22                   MR. GUIRGUIS: We seem to be  
23   missing Exhibit 8 from the stack.

24                   MS. MENNINGER: I checked it  
25   during the break.

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS:   It's just out  
3                   of order.

4                   THE WITNESS:   Is this  
5                   Defendant's Exhibit 8?

6                   MS. MENNINGER:   Eight.

7                   THE WITNESS:   Is this  
8                   Exhibit 8?

9                   MR. GUIRGUIS:   Yes, it is.

10                  Q.       So the emails with [REDACTED]  
11                  Maybe I wrote it down wrong.   I  
12                  apologize.

13                  MR. GUIRGUIS:   With who?  
14                  I'm sorry?

15                  MS. MENNINGER:   [REDACTED] --

16                  THE WITNESS:   That was  
17                  Exhibit -- oh, gosh.   This is  
18                  Exhibit 9 between [REDACTED] and  
19                  myself.

20                  Q.       Okay.   And it's got RANSOME  
21                  0004 and 0005; is that right?   Just  
22                  making sure we're looking at the same  
23                  thing.   On the lower right-hand  
24                  corner.

25                  A.       Yes, 000004.



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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       All right. Those are emails  
3 that you and [REDACTED] exchanged in  
4 February of 2007, correct?

5           A.       That's correct.

6           Q.       And can you read to us the  
7 email at the bottom from you to [REDACTED]  
8 on February 8, 2007.

9           A.       "Hey sweetie, how are you?  
10 I'm busy writing my essay for FIT.  
11 What fun. I had a bit of a fight with  
12 Jeffrey. Oh, well, what can you do.  
13 I meant to ask in my last email can  
14 you please email me your address. It  
15 looks like I'm not going to Miami  
16 either. Well, at least I will be back  
17 in NY. Hope you are well and look  
18 forward to seeing you soon. Please  
19 tell [REDACTED] I say hi. Lots of hugs  
20 and kisses, Sarah."

21          Q.       Were you writing your FIT  
22 essay in February 2007 while you were  
23 in South Africa?

24          A.       Yeah. It took me quite some  
25 time writing my essay, so it was over

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Page 409

1                   HIGHLY CONFIDENTIAL AEO

2       a duration of...

3           Q.       Did you email your essay  
4       from South Africa to Ghislaine  
5       Maxwell?

6           A.       I don't recall emailing her.

7           Q.       Defendant's Exhibit 10, I  
8       think it is, with [REDACTED] [REDACTED]?

9           A.       Yes.

10                  MR. GUIRGUIS: Hold on a  
11       second. Let me just find my  
12       copy.

13           Q.       And I show RANSOME 006 is  
14       the first one in the lower right-hand  
15       corner.

16           A.       Yes.

17           Q.       So did you correspond with  
18       [REDACTED] about faxing your FIT  
19       application in to her on or about  
20       February 8, 2007?

21           A.       Yes.

22           Q.       Did you also ask her to look  
23       into booking a flight for you back to  
24       New York?

25           A.       That's correct.

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Did you give her the date  
3   you wanted to fly back?

4           A.       That's correct.

5           Q.       And the next email down, did  
6   you say, "Hi, can you please phone  
7   back?"

8           A.       Mm-hmm.

9           Q.       Was that to [REDACTED] or to  
10   Jeffrey?

11          A.       I can't remember who it was  
12   to.   Jeffrey never corresponded  
13   directly; he either did it through  
14   [REDACTED] [REDACTED] or -- so I can't remember  
15   who phoned me back.

16          Q.       Can you turn two pages back  
17   to where it says RANSOME\_0009.

18                   Do you see those emails?

19          A.       Mm-hmm.

20                   MR. GUIRGUIS:   Read the  
21   emails, don't just...

22          Q.       Did [REDACTED] ask what type of  
23   visa you were coming on, student or  
24   tourist?

25                   MR. GUIRGUIS:   Hold on,

Highly Confidential

Page 411

1                   HIGHLY CONFIDENTIAL AEO

2           Counsel.

3                   Are you through with it?

4                   THE WITNESS: Sorry, I  
5           haven't finished reading yet.

6           Q.       Did [REDACTED] ask what type of  
7   visa you were coming on, student or  
8   tourist?

9           A.       That's correct.

10          Q.       And what was your response?

11          A.       I can't remember what my  
12   response was.

13          Q.       Is it visible in this  
14   exhibit?

15          A.       No.

16          Q.       All right. You said you  
17   left New York in late April --

18          A.       That's correct.

19          Q.       -- 2007?

20                   Did you find any records  
21   reflecting that departure when you  
22   were going through all of your emails  
23   and your other documents?

24          A.       No.

25          Q.       When was the last time you

Highly Confidential

Page 412

1                   HIGHLY CONFIDENTIAL AEO

2       saw Jeffrey Epstein?

3           A.       April 2007.

4           Q.       Where did you see him last?

5           A.       In New York.

6           Q.       Where in New York?

7           A.       I can't remember where I  
8       last saw him.

9           Q.       Do you remember what  
10       happened the last time you saw him?

11          A.       No, I can't remember what  
12       happened.

13          Q.       Do you know whether he gave  
14       you any money the last time you saw  
15       him?

16          A.       No, he didn't give me money.

17          Q.       Do you know if you talked  
18       about FIT the last time you saw him?

19          A.       I didn't really want  
20       anything do with Jeffrey and Ghislaine  
21       at that stage. So at that point I did  
22       not talk about FIT anymore with them.  
23       I just wanted to go back home to my  
24       mom.

25          Q.       And this is when you were

Highly Confidential

Page 413

1                   HIGHLY CONFIDENTIAL AEO

2       living with [REDACTED]

3           A.       Yes.

4           Q.       When did you decide you  
5       didn't want to have anything to do  
6       with Jeffrey Epstein?

7           A.       After my trip to South  
8       Africa, my relationship deteriorated  
9       with Jeffrey and Ghislaine. So I  
10      didn't really want to be here anymore.

11          Q.       When did you make that  
12      decision?

13          A.       I was kind of toying with  
14      the idea of going back. I was in a  
15      bit of a mess after what I had been  
16      through with Ghislaine and Jeffrey,  
17      so -- yeah.

18          Q.       And who purchased your plane  
19      ticket to London?

20          A.       I think it was my mom. I  
21      can't remember.

22          Q.       Were you still taking the  
23      medications at the time you went back?

24          A.       Yes.

25          Q.       And you returned from South

Highly Confidential

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1                   HIGHLY CONFIDENTIAL AEO

2       Africa in February 2007, correct?

3           A.       That's correct.

4           Q.       And that's when you made the  
5       decision to break with Jeffrey by  
6       moving in with [REDACTED] correct?

7           A.       I wanted to distance myself  
8       from Jeffrey. Things weren't great.  
9       What he was doing was wrong and what  
10      he was doing to me was wrong, and I  
11      got pretty depressed about it. I was  
12      in -- I was stuck in a dark hallway.  
13      I was basically being abused by a man,  
14      and I -- I didn't -- I didn't know  
15      what to do, where to go.

16          Q.       Did you have a bank account  
17      in New York?

18          A.       Yes, I did.

19          Q.       With which bank?

20                   MR. GUIRGUIS: Objection.

21                   Same objection I gave at the  
22                   beginning, financial information  
23                   for a nonparty witness.

24                   MS. MENNINGER: The name of  
25                   the bank. The name of the bank.

Highly Confidential

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1                   HIGHLY CONFIDENTIAL AEO

2           Q.       Let me ask you this: What  
3 did you do with the cash you received  
4 from Jeffrey Epstein? Did you put it  
5 in the bank?

6           A.       No. I spent it on food,  
7 cabs. General expenses.

8           Q.       Where did you get the money  
9 that you put into the bank?

10          A.       From the occasional modeling  
11 job that I got, freelance modeling.

12          Q.       Were you still modeling in  
13 the spring of 2007?

14          A.       No.

15                   MR. GUIRGUIS: Off the  
16 record.

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

19                   MR. GUIRGUIS: Back on the  
20 record.

21                   MS. MENNINGER: I think if  
22 you can just give my co-counsel  
23 and I a minute off the record.

24                   (Time noted: 6:28 p.m.)

25                   (Recess.)



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1                   HIGHLY CONFIDENTIAL AEO

2                   (Time noted: 6:29 p.m.)

3           Q.       In February of 2007, you  
4   decided to make a break with Jeffrey  
5   Epstein, correct?

6           A.       No, I didn't decide to make  
7   a break with Jeffrey Epstein. He let  
8   me down with my FIT application and he  
9   wasn't taking me seriously, and he  
10   wasn't following through his end of  
11   the deal, basically.

12          Q.       How did he let you down with  
13   your FIT application?

14          A.       Because I didn't go to FIT.

15          Q.       And why didn't you go to  
16   FIT?

17          A.       Because I wanted to go home  
18   back to my mom.

19          Q.       When did you decide that he  
20   let you down with the FIT application?

21          A.       Well, I think it was pretty  
22   much after that incident with Alan and  
23   the fact that I had been sexually  
24   abused for months on end by Jeffrey, I  
25   kind of wanted to call it time with

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1                   HIGHLY CONFIDENTIAL AEO

2       him.

3                   I saw how he was acting with  
4       the other girls. I saw how they got  
5       pretty mentally messed up as well; for  
6       example, [REDACTED] So...

7           Q.       And you saw that before you  
8       went to South Africa?

9           A.       Yes.

10          Q.       And while you were in South  
11       Africa, you got in a fight with  
12       Jeffrey.

13          A.       That's correct.

14          Q.       And you didn't want to lose  
15       this weight, correct?

16          A.       I didn't want to lose this  
17       weight because I would be dead if I  
18       weighed 52 kilograms.

19          Q.       You didn't want to lose the  
20       weight in South Africa, correct?

21          A.       I wanted to -- I was  
22       desperate to go to FIT. I tried to  
23       lose as much weight as I could for  
24       Jeffrey and Ghislaine.

25          Q.       While you were in South

Highly Confidential

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1                   HIGHLY CONFIDENTIAL AEO

2       Africa, you did some reevaluating of  
3       your life?

4                   MR. GUIRGUIS:   Objection.

5           A.       Reevaluating of my life?   I  
6       wouldn't say I spent the holiday  
7       reevaluating my life, no.

8           Q.       Were you happy when you were  
9       in South Africa?

10          A.       I was concerned because I  
11       was being asked and being hounded to  
12       find a 18-year-old PA for Jeffrey, and  
13       I knew that was wrong because he would  
14       do exactly the same thing to that girl  
15       that he did to me, and I would not let  
16       him do that to another girl.

17          Q.       So when you were in South  
18       Africa, you decided to make a break  
19       from Jeffrey.

20                  MR. GUIRGUIS:   Objection.

21          A.       I didn't decide to make a  
22       break; I decided to distance myself  
23       from Jeffrey.   Not make a break, but  
24       to distance myself.

25          Q.       When you came back, you

Highly Confidential

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1                   HIGHLY CONFIDENTIAL AEO

2       moved in with [REDACTED]

3           A.       That's correct.

4           Q.       You can't remember the last  
5       time that you saw Jeffrey?

6                   MR. GUIRGUIS:   Objection.

7           That's not the testimony.

8           A.       No.

9                   MS. MENNINGER:   No further  
10       questions.   Thank you.

11                   THE WITNESS:   Thank you.

12                   MS. MENNINGER:   Do you have  
13       any?

14                   MR. GUIRGUIS:   Give me one  
15       second to confer.

16                   We have no questions.

17                   MS. MENNINGER:   Counsel,  
18       we're going to, unfortunately,  
19       before we go off the record, need  
20       to leave the deposition open,  
21       just because there are some email  
22       documents that were referenced  
23       but not produced.   And we can  
24       follow up and have a discussion  
25       with counsel about that.

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1                   HIGHLY CONFIDENTIAL AEO

2                   MR. GUIRGUIS:   Okay.   So on  
3                   the record -- we can carry on the  
4                   conversation, certainly, off the  
5                   record.

6                   But while we're on the  
7                   record, I will say that my  
8                   understanding is that those  
9                   documents were all produced to  
10                  you, including all the emails  
11                  that you asked her about, and  
12                  where are the missing emails, and  
13                  she kept saying they'd been  
14                  produced to her attorneys.   My  
15                  understanding is that the  
16                  attorneys did provide them to  
17                  defense counsel.

18                  MS. MENNINGER:   Well,  
19                  there's a current passport that  
20                  we know was not produced, there  
21                  is an FIT application that we  
22                  know was not produced, and I  
23                  believe there are emails that  
24                  were not produced.

25                  And I'm happy to have the

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1                   HIGHLY CONFIDENTIAL AEO  
2           conversation continue off the  
3           record, but I'm telling you those  
4           are some of my recollections.

5                   MR. GUIRGUIS:   Okay.   And to  
6           be clear so that I'm not  
7           misrepresenting, I see that I  
8           said there were documents and the  
9           emails.   I meant to clarify, as  
10          in the emails I know were  
11          produced.

12                   I can't speak to any other  
13          documents that you might want to  
14          raise a dispute about.   But with  
15          respect to the emails that you  
16          said, my understanding, at least  
17          as I sit here, is that they were  
18          produced.

19                   That said, I think we can go  
20          off the record and resolve any  
21          other issues between counsel and  
22          I.

23                   (Time noted:   6:34 p.m.)  
24  
25

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HIGHLY CONFIDENTIAL AEO

-----  
SARAH RANSOME

Signed and subscribed to  
before me, this \_\_\_\_\_ day  
of \_\_\_\_\_ 2017.

-----  
Notary Public

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Page 423

1

2

C E R T I F I C A T E

3

STATE OF NEW YORK )

:

4

COUNTY OF NEW YORK)

5

6

7

8

I, Jeremy Richman, a Notary Public  
within and for the State of New York, do hereby  
certify:

9

10

11

12

13

THAT SARAH RANSOME, the witness  
whose deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition is a  
true record of the testimony given by such  
witness.

14

15

16

17

I further certify that I am not  
related to any of the parties to this action by  
blood or marriage; and that I am in no way  
interested in the outcome of this matter.

18

19

IN WITNESS WHEREOF, I have hereunto  
set my hand this 19th day of February 2017.

20

21

22



Jeremy Richman

23

24

25



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1		
2	INDEX	
3	EXAMINATION BY	
4	MS. MENNINGER	7
5	P.M. Session	199
6		
7	EXHIBITS MARKED	
8	(Defendant's Exhibit 1, hand-drawn	128
9	picture marked for identification.)	
10	(Defendant's Exhibit 2, hand-drawn	149
11	picture, was marked for	
12	identification.)	
13	(Defendant's Exhibit 3, affidavit,	262
14	was marked for identification.)	
15	(Defendant's Exhibit 4,	274
16	RANSOME_000168, was marked for	
17	identification.)	
18	(Defendant's Exhibit 5, jury trial	323
19	demand, was marked for	
20	identification.)	
21	(Defendant's Exhibit 6, Bates	335
22	stamped Ransome_000017, was marked	
23	for identification.)	
24	(Defendant's Exhibit 7, Bates	339
25	stamped Ransome_000204, was marked	

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1	for identification.)	
2	(Defendant's Exhibit 8, Notice of	363
3	Service of Rule 45 Subpoena and	
4	Notice of Deposition of Sarah	
5	Ransome, was marked for	
6	identification.)	
7	(Defendant's Exhibit 8, Bates	377
8	stamped RANSOME_000004, was marked	
9	for identification.)	
10	(Defendant's Exhibit 10, Bates	384
11	stamped RANSOME_000006, was marked	
12	for identification.)	
13	(Defendant's Exhibit 11, Maureen	386
14	Callahan article, was marked for	
15	identification.)	
16	(Defendant's Exhibit 12, website	389
17	printout titled How to Apply, was	
18	marked for identification.)	
19	(Defendant's Exhibit 13, Bates	393
20	stamped RANSOME_000007 was marked	
21	for identification.)	
22		
23	QUESTIONS INSTRUCTED NOT TO ANSWER	
24	do you have any source of income?	10
25	so I'm going to ask you a last	12

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1	time: Do you have any source of	
2	income?	
3	what is your partner's occupation?	13
4	and where do your parents live?	14
5	Ms. Ransome, there was a question	15
6	pending when you took a break with	
7	your lawyers. Can you please	
8	answer the question.	
9	what is your partner's cell phone	28
10	number?	
11	and you're staying where while	31
12	you're here?	
13	have you been promised that you	34
14	would have counsel to help you	
15	bring a lawsuit against a number of	
16	people?	
17	what's the private legal matter?	172
18	what did you talk about with Alan	184
19	Dershowitz?	
20	did you sign a common interest	185
21	agreement with Jeffrey?	
22	did he do anything in terms of	199
23	contacting anyone on your behalf?	
24	what was the specific legal matter	199
25	that you were seeking	

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1 representation for?

2 who prescribed it to you? 204

3 so please tell me how to reach your 241

4 stepmother, [REDACTED] [REDACTED].

5 when did you see that? 284

6 when did you provide them to your 363

7 counsel?

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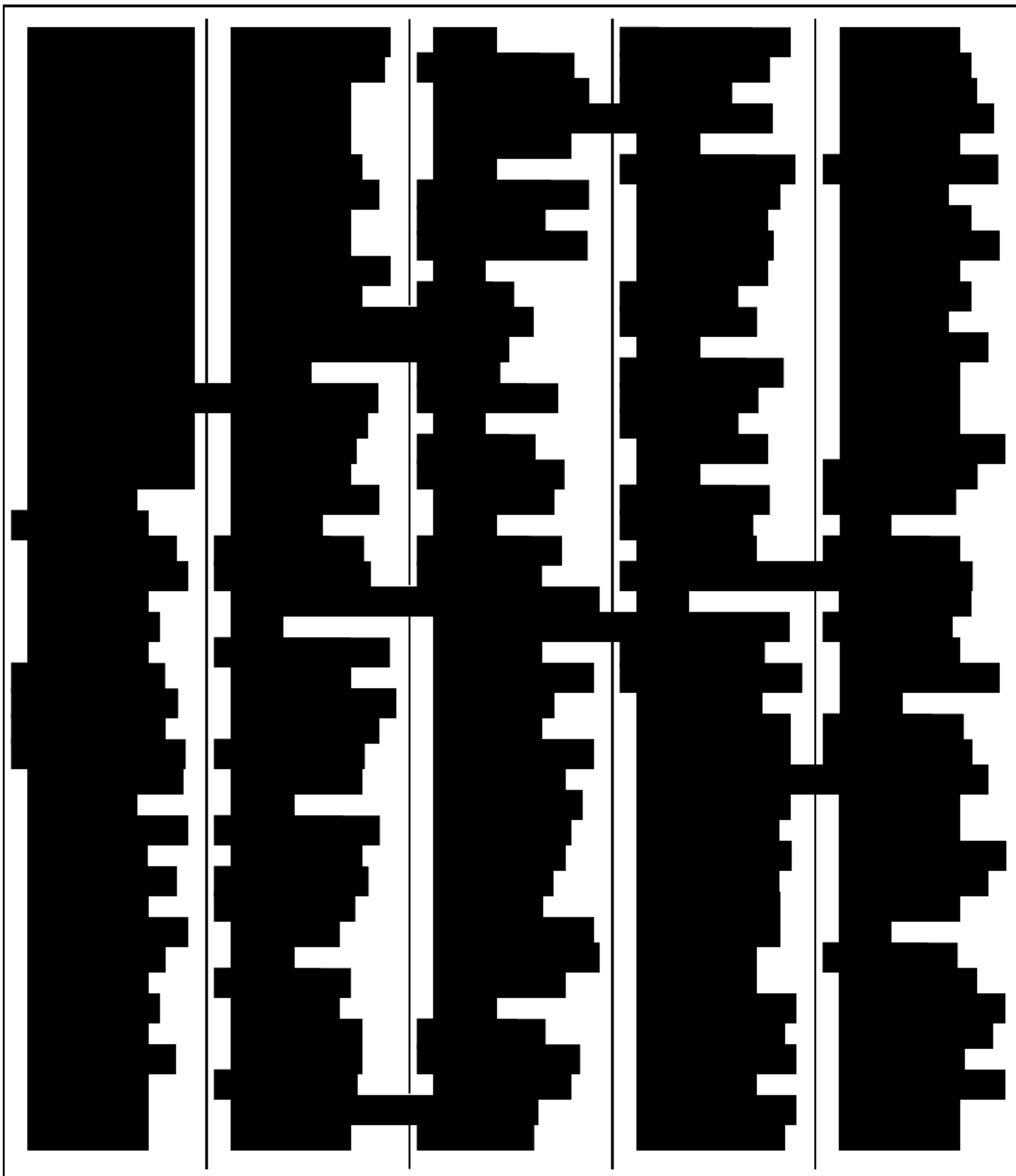
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Page 1

<div>[REDACTED]</div>	<div>[REDACTED]</div>	<div>[REDACTED]</div>	<div>[REDACTED]</div>	<div>[REDACTED]</div>
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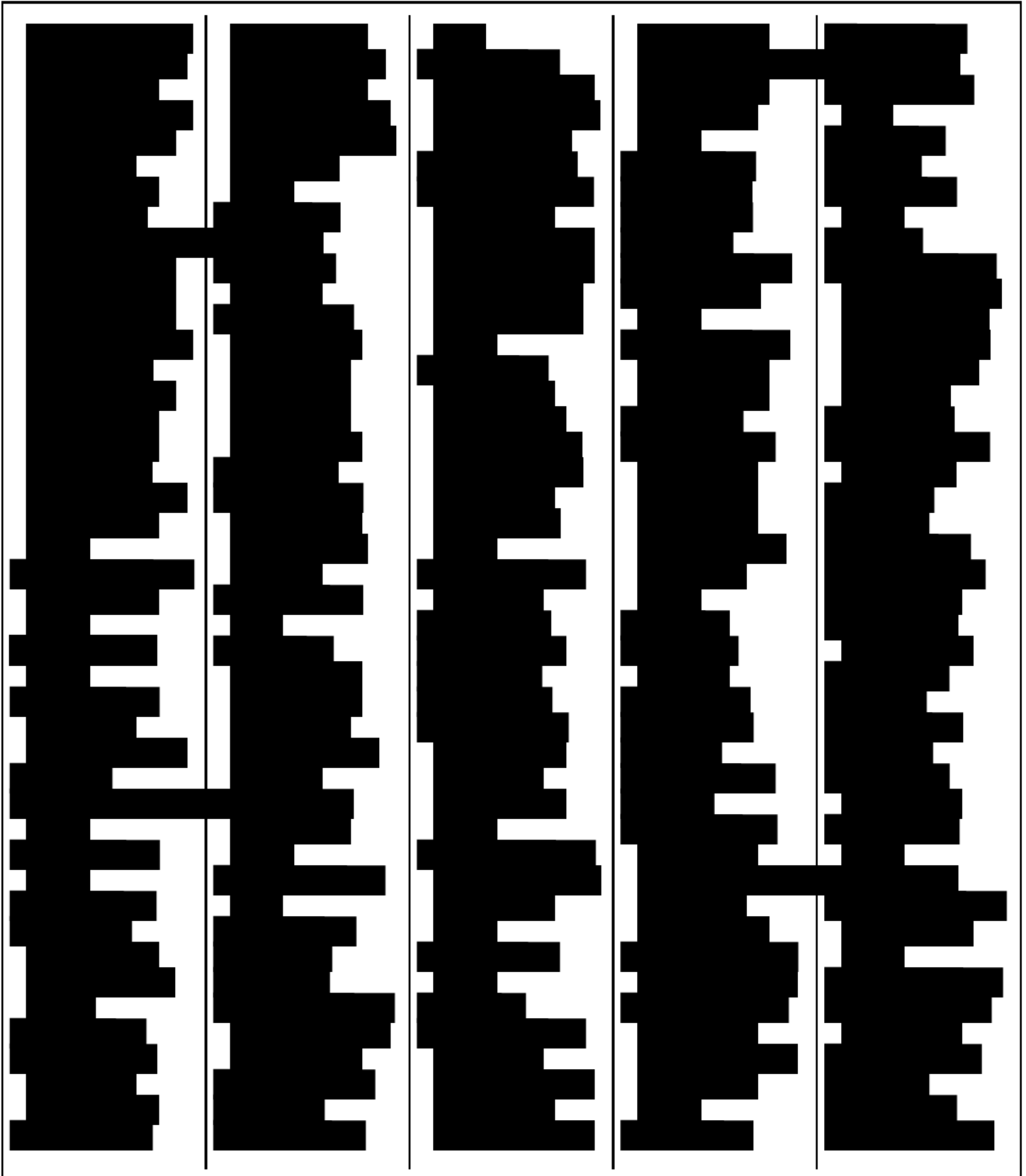
Page 2



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Page 5

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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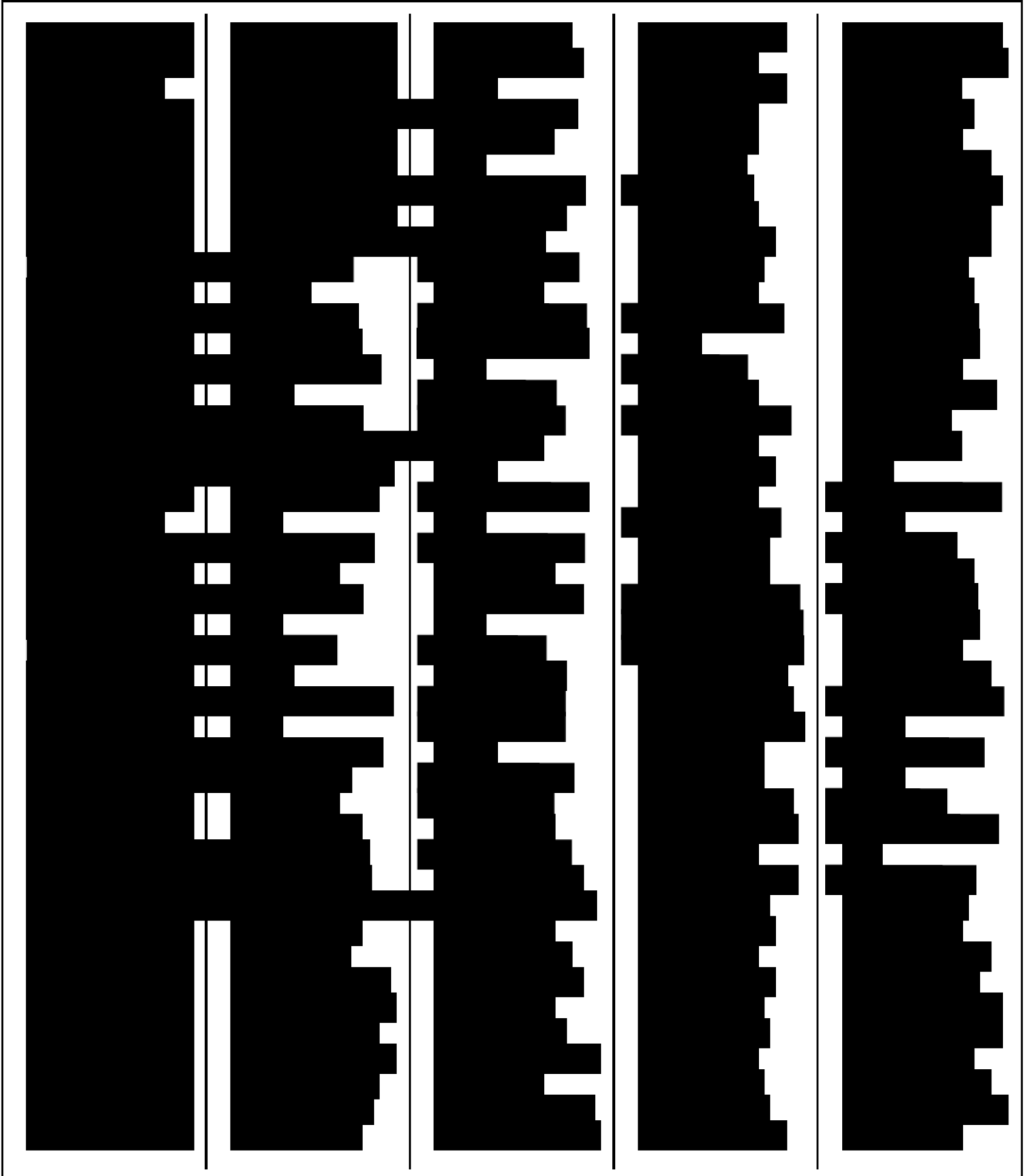
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[illegible]

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Page 10

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[illegible]

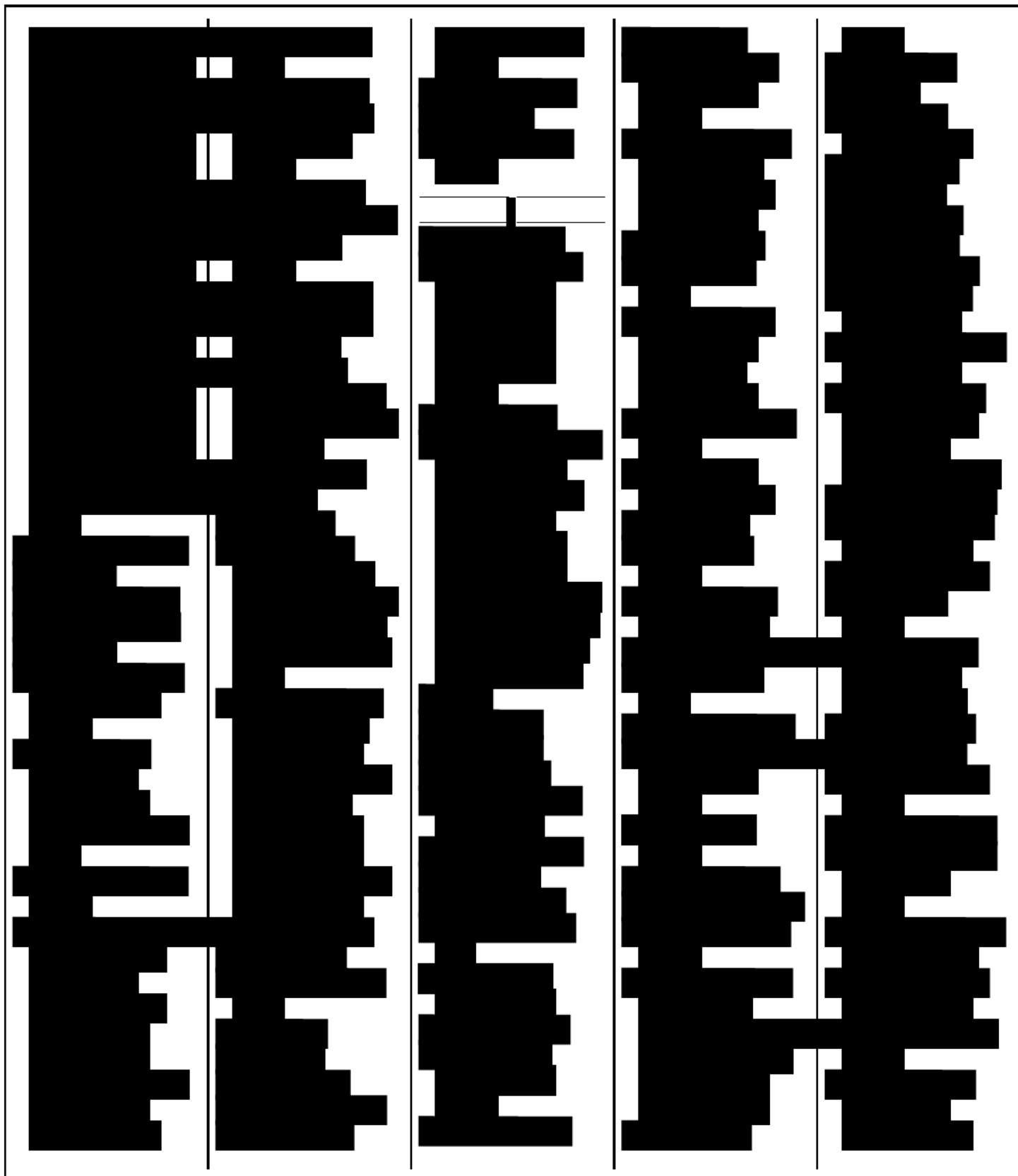
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
------------	------------	------------	------------	------------

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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<div data-bbox="99 197 380 357">[REDACTED]</div> <div data-bbox="99 357 380 1831">[REDACTED]</div>	<div data-bbox="380 197 667 1831">[REDACTED]</div>	<div data-bbox="667 197 954 1831">[REDACTED]</div>	<div data-bbox="954 197 1242 1831">[REDACTED]</div>	<div data-bbox="1242 197 1523 1831">[REDACTED]</div>
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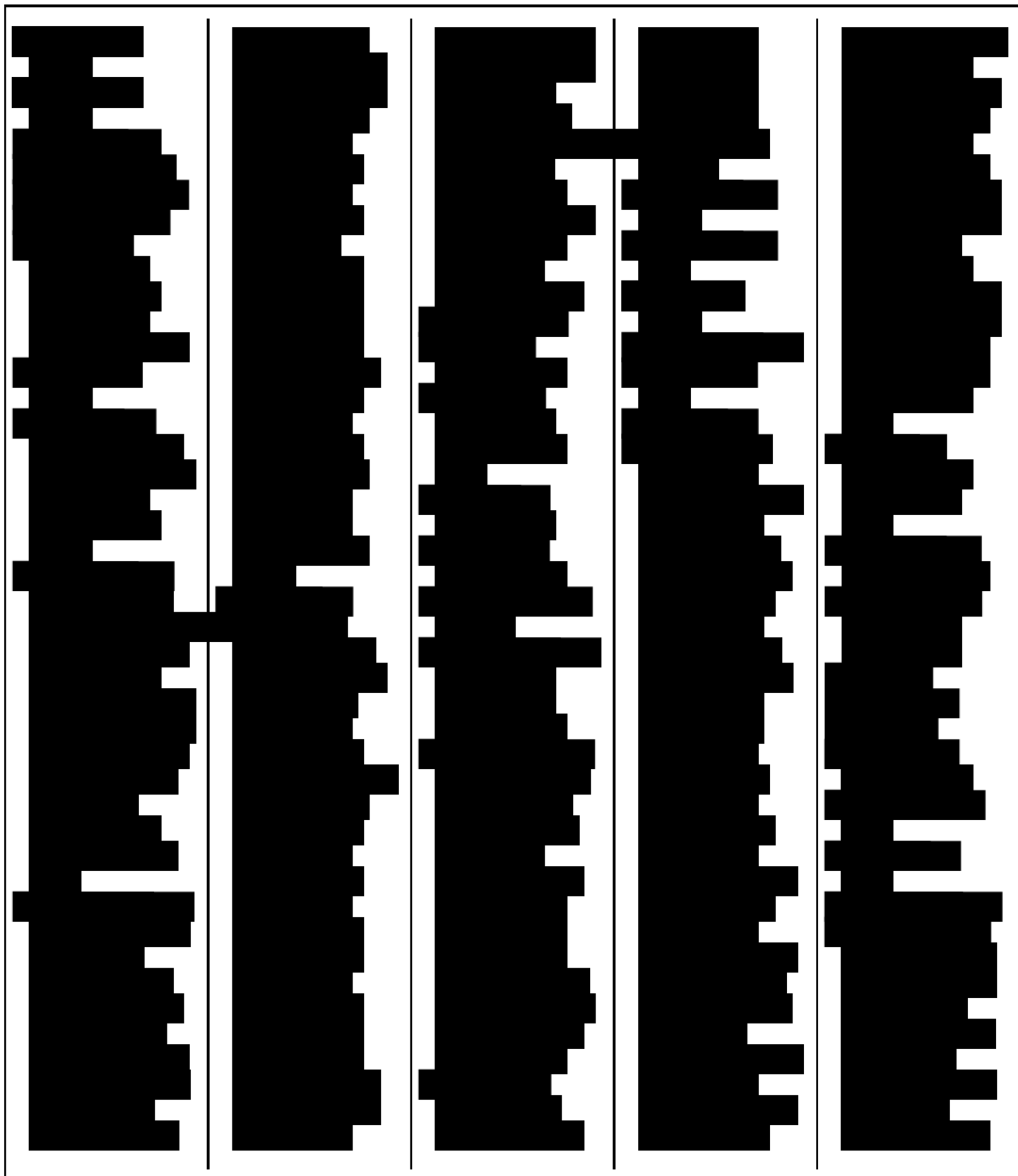
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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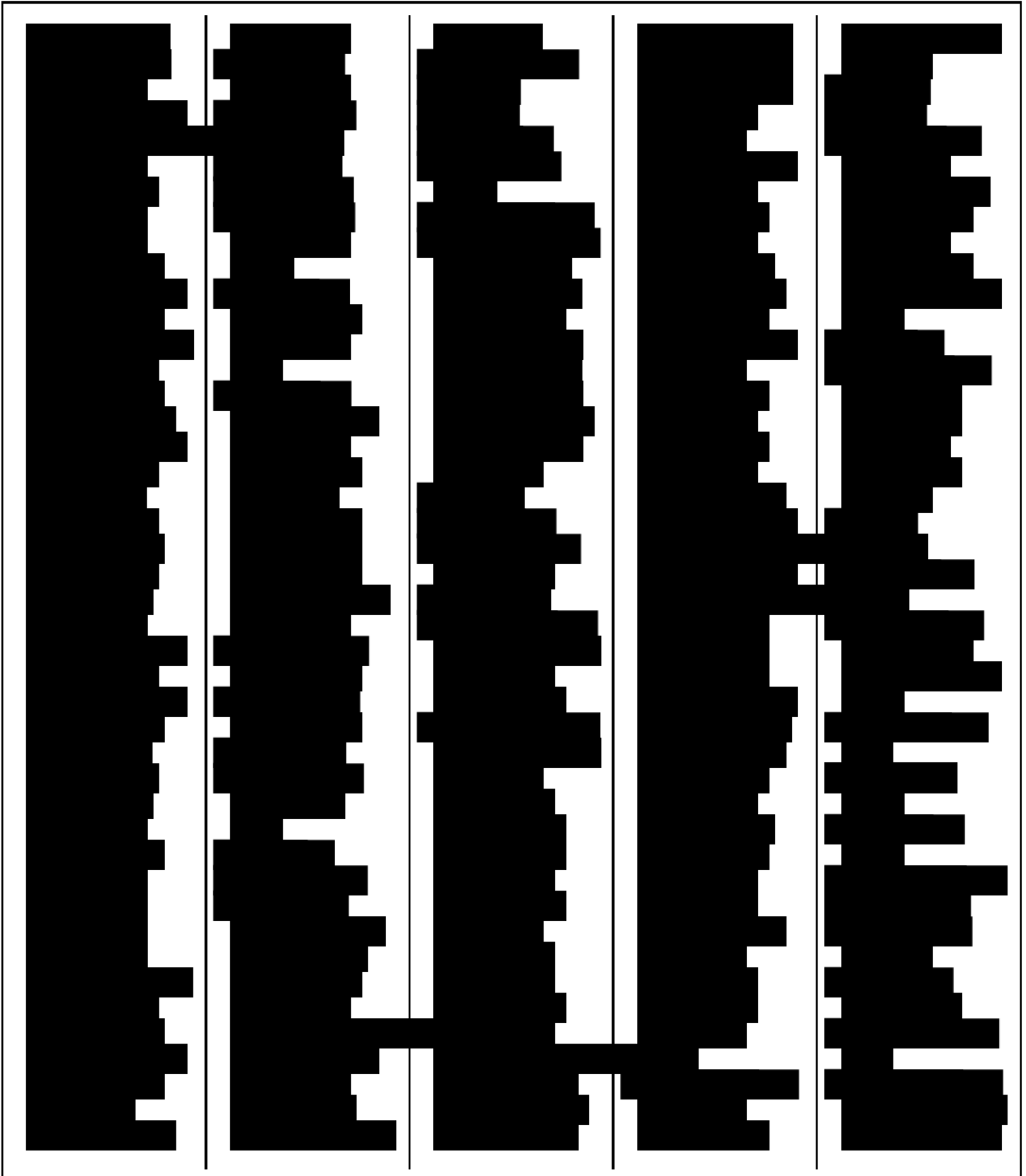


[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[illegible]

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[illegible]

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[illegible]



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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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86	87	88	89	90
91	92	93	94	95
96	97	98	99	100

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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Page 32

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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96	97	98	99	100

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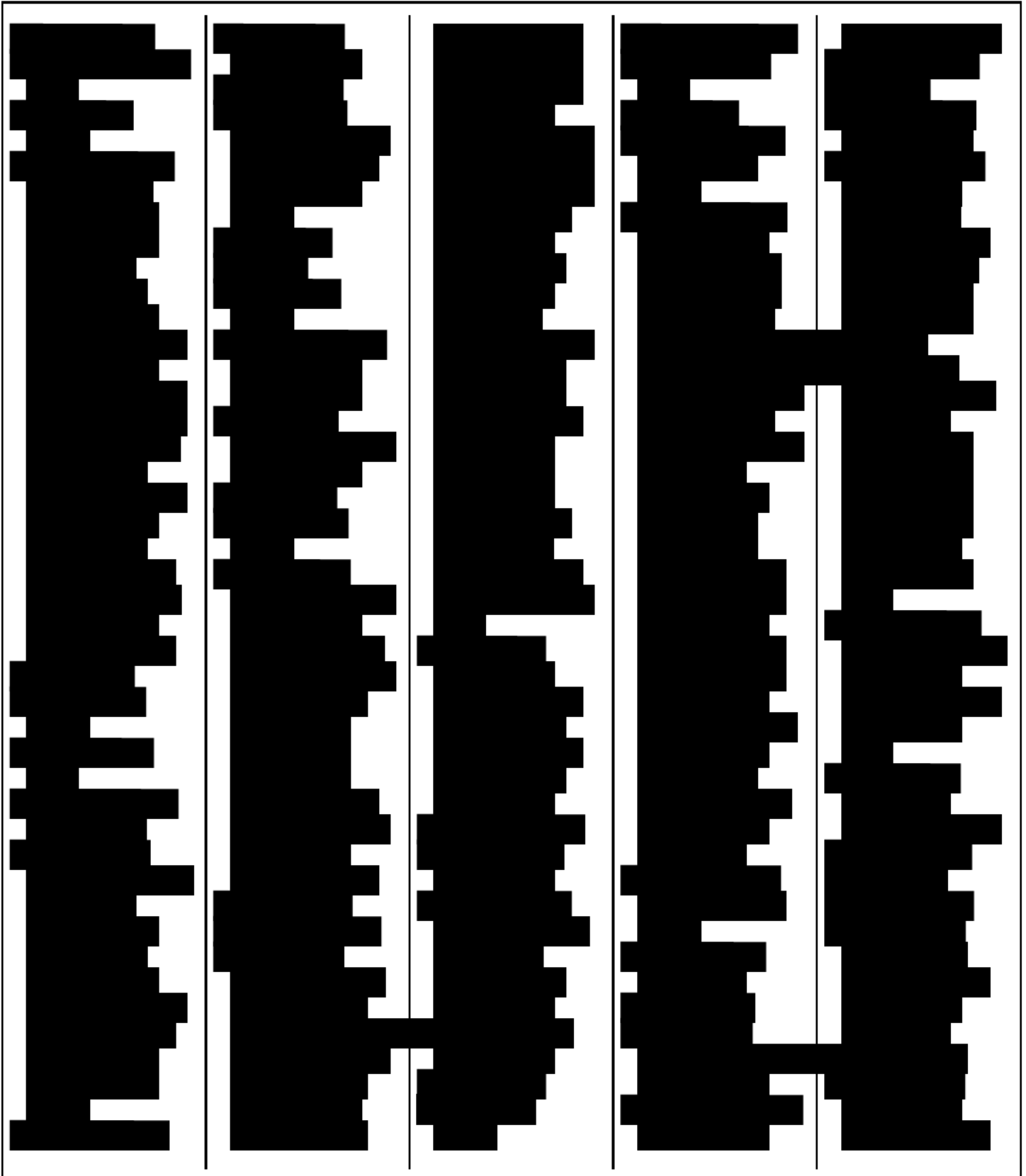




[illegible]

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