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UNITED STATES GRAND JURY

SOUTHERN DISTRICT OF NEW YORK

- - - - - --x

UNITED STATES OF AMERICA :

-V-

: January 19, 2021 Additional

GHISLAINE MAXWELL :  
(2018R01618)

- - - - - x

United States Courthouse  
Foley Square  
New York, New York

March 29, 2021  
10:05 a.m.

A P P E A R A N C E S:

[REDACTED] [REDACTED]  
n [REDACTED] ted States Attorney

[REDACTED] [REDACTED]  
an [REDACTED] d States Attorney

[REDACTED] [REDACTED]  
Gr [REDACTED] Jury Reporter

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Balt. & Annap. 410-974-0947

1 (Colloquy Precedes)

2 (Witness Enters Room)

3 (Time Noted: 10:14 a.m.)

4 [REDACTED] [REDACTED] called as a witness, having been duly sworn by  
5 the Foreperson of the Grand Jury, was examined and  
6 testified as follows:

7 BY MS. [REDACTED]

8 Q. Good morning.

9 A. Good morning.

10 Q. Would you please state your name for the record?

11 A. Detective [REDACTED] [REDACTED]

12 Q. Detective [REDACTED] where do you work?

13 A. New York City Police Department.

14 Q. I'm going to ask you to please keep your voice up,  
15 and speak as slowly as you can.

16 UNIDENTIFIED SPEAKER. --

17 BY MS. [REDACTED]

18 Q. And you can pull the microphone toward you so that  
19 everyone in this big room can hear you. Thank you. Where  
20 do you work?

21 A. New York City Police Department.

22 Q. What is your title there?

23 A. Detective.

24 Q. How long have you been with the NYPD?

25 A. About 15 years.

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1 Q. Are you currently part of a federal task force?

2 A. Yes.

3 Q. What task force?

4 A. The Child Exploitation and Human Trafficking Task  
5 Force with the FBI.

6 Q. What is your title on the task force?

7 A. Task force officer.

8 Q. How long have you been a task force officer with  
9 the FBI?

10 A. Since about 2017.

11 Q. Generally, what are your duties and  
12 responsibilities on the task force?

13 A. We address cases of child sex-trafficking, adult  
14 sex-trafficking, child pornography, and child enticement.

15 Q. Over the last, approximately, three years have you  
16 been involved in an investigation into Jeffrey Epstein and  
17 his associates, including an individual named  
18 Ghislaine Maxwell?

19 A. Yes.

20 Q. During your investigation have you spoken with  
21 other people, including other law enforcement officers?

22 A. Yes.

23 Q. Have you reviewed reports and documents prepared  
24 by others, and transcripts of testimony in other court and  
25 grand jury proceedings?

1 A. Yes.

2 Q. Will your testimony today be based in part on  
3 those conversations and documents that you have reviewed?

4 A. Yes.

5 MS. [REDACTED] Ladies and gentlemen, some of the  
6 testimony you are going to hear from Detective [REDACTED] will  
7 include hearsay. That means he is not going to testify only  
8 from his own personal observations, he will also be  
9 testifying about what other people have told him and what he  
10 has read in documents.

11 Hearsay evidence, as you know, is admissible and  
12 proper in these proceedings, and you are permitted to rely  
13 on it in determining whether there is probable cause to  
14 indict the defendant, but if you want to hear testimony from  
15 other witnesses, or see particular documents, please let me  
16 know, and I will make my best efforts to bring those before  
17 you.

18 BY MS. [REDACTED]

19 Q. Detective [REDACTED] over the course of your  
20 investigation has another member of the FBI task force  
21 you're a part of testified before a different grand jury  
22 about the facts of this case?

23 A. Yes.

24 Q. I'd like to ask you to please pick up what should  
25 be in front of you and marked as Grand Jury Exhibit 3. Do

1 you recognize that?

2 A. Yes.

3 Q. Is this document a fair and accurate transcript of  
4 testimony given by FBI Special Agent [REDACTED] before a  
5 different grand jury, on June 29, 2020?

6 A. Yes.

7 Q. I'd like to read back a portion of this  
8 transcript. We will start at Page 2, Line 18. I will read  
9 the questions, you read the answers.

10 Q. "Where do you currently work?"

11 A. "The Federal Bureau of Investigation."

12 Q. "What is your title?"

13 A. "Special agent."

14 Q. "How long have you worked as a special agent?"

15 A. "About three years now."

16 Q. "Where are you currently assigned?"

17 A. "I work on the Violent Crimes Against Children's  
18 Squad."

19 Q. "What are your duties and responsibilities as a  
20 special agent on that squad?"

21 A. "We investigate crimes that have to do with child  
22 sexual abuse material, sextortion, exploitation, and  
23 enticement of minors, sex-trafficking."

24 MS. [REDACTED] You can stop there. I'll now jump to  
25 Page 4, line 13.

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1 BY MS. [REDACTED]

2 Q. "Have you participated in an investigation of  
3 Ghislaine Maxwell?"

4 A. "Yes, I have."

5 Q. "Have you spoken to other people, including other  
6 law enforcement officers about this investigation?"

7 A. "Yes."

8 Q. "Have you reviewed reports and documents prepared  
9 by others regarding this case?"

10 A. "Yes."

11 Q. "Is your testimony today based in part on those  
12 conversations with other law enforcement officers and  
13 documents that you have reviewed?"

14 A. "Yes."

15 MS. [REDACTED] Stepping out of the read back. At  
16 this point the AUSA provided the same hearsay instruction to  
17 the grand jury, at that time, as I just provided to you all.  
18 So that instruction applies with respect to  
19 [REDACTED] testimony the same way it applies to  
20 Detective [REDACTED] testimony.

21 We can now go down to Page 5, line 17.

22 BY MS. [REDACTED]

23 Q. "[REDACTED] we've placed on the desk in  
24 front of you a PowerPoint that is Grand Jury Exhibit 2 which  
25 we're entering into the record. Do you recognize this?"

1 A. "Yes."

2 Q. "What is it?"

3 A. "It's a PowerPoint presentation to assist in  
4 testifying today."

5 Q. "Did you participate in preparing this Exhibit in  
6 connection with your testimony today?"

7 A. "Yes, I did."

8 Q. "If you could please turn to the first slide. Who  
9 are the individuals depicted in these photographs?"

10 A. "The picture on the left is Ghislaine Maxwell, and  
11 the picture on the right is Jeffrey Epstein with  
12 Ghislaine Maxwell."

13 Q. "Based on your participation in this investigation  
14 and your review of public source materials, have Maxwell and  
15 Epstein been photographed together many times over the  
16 years?"

17 A. "Yes."

18 Q. "Based on your participation in this investigation  
19 and your review of public materials, where is Maxwell from?"

20 A. "Maxwell was born in France, she grew up in United  
21 Kingdom, was educated in Oxford and is from a wealthy  
22 family."

23 Q. "Is she a citizen of France, the United Kingdom,  
24 and the United States?"

25 A. "Yes."

1 Q. "How old is she currently?"

2 A. "Fifty-eight."

3 Q. "Has the FBI investigated Maxwell and Epstein's  
4 conduct with minors during the 1990s?"

5 A. "Yes."

6 Q. "Generally speaking, what have you learned about  
7 the relationship between Maxwell and Epstein during the  
8 1990s?"

9 A. "Epstein and Maxwell had a romantic relationship,  
10 and she also worked for him; managing his homes, hiring and  
11 firing individuals."

12 Q. "During that time period, was she one of his  
13 closest associates?"

14 A. "Yes."

15 Q. "During the course of this investigation have you  
16 learned where Epstein maintained properties in the 1990s?"

17 A. "Yes."

18 Q. "Where did he maintain properties?"

19 A. "New York, Palm Beach, and New Mexico."

20 Q. "Turning to the next slide, did he maintain an  
21 address in Manhattan located at 9 East 71st Street?"

22 A. "Yes."

23 Q. "Does this slide fairly and accurately depict that  
24 residence?"

25 A. "Yes."



1 Q. "Can you please describe that property for the  
2 grand jury?"

3 A. "It's a seven-story home. It's located near  
4 Central Park. It's reportedly the largest residence in  
5 Manhattan."

6 Q. "Based on your participation in this  
7 investigation, did that house include a room that was used  
8 as a massage room?"

9 A. "Yes, it did."

10 Q. "All right. We'll talk more about that later but  
11 for now, moving on to the other properties. Did he maintain  
12 an address in Palm Beach, Florida, located at  
13 358 El Brillo Way?"

14 A. "Yes."

15 Q. "Turning to the next slide. Does this slide  
16 fairly and accurately depict the residence?"

17 A. "Yes, it does."

18 Q. "Could you please describe that property for the  
19 grand jury?"

20 A. "It's a water-front estate. It has an in-ground  
21 pool and a detached dwelling, or pool house, on the property  
22 as well."

23 Q. "Aside -- and from your participation in this  
24 investigation and your review of other materials, did that  
25 house include a room that was used as a massage room?"

1 A. "Yes."

2 Q. "Turning to the next property. Did Epstein also  
3 own a ranch in New Mexico?"

4 A. "Yes, he did."

5 Q. "And turning to the next slide, was that a  
6 property located at 49 Zorro Ranch Road in Stanley,  
7 New Mexico?"

8 A. "Yes."

9 Q. "Looking at the photograph on this slide does this  
10 accurately depict that property?"

11 A. "Yes, it does."

12 Q. "And we've been talking about the properties that  
13 Epstein owned during this time period. Did he also own a  
14 private jet?"

15 A. "Yes."

16 Q. "Is it fair to say that he was a multi-millionaire  
17 during this time period?"

18 A. "Yes."

19 Q. "During the 1990s did Epstein have an employee,  
20 [REDACTED] who ran his house in Palm Beach?"

21 A. "Yes, he did."

22 Q. "What was his job?"

23 A. "His job was making sure that everything in the  
24 house ran smoothly. He referred -- he described that  
25 Epstein liked to have his house run like a five-star hotel;

1 that everything had to be in its proper place. So he was  
2 responsible for managing that."

3 Q. "Have you interviewed [REDACTED] [REDACTED]"

4 A. "Yes."

5 Q. "How many times?"

6 A. "Twice."

7 Q. "And is the information you're about to provide  
8 based on your interviews with [REDACTED] [REDACTED]"

9 A. "Yes."

10 Q. "Did [REDACTED] begin working for Epstein in the early  
11 1990s?"

12 A. "Yes, he did."

13 Q. "At the time [REDACTED] came to work for Epstein in  
14 Palm Beach, was Epstein dating Ghislaine Maxwell at that  
15 point?"

16 A. "Not at that time."

17 Q. "Was it a few years before Epstein began dating  
18 Maxwell after [REDACTED] started working there?"

19 A. "Yes."

20 MS. [REDACTED] I'm going to step out of the read  
21 back. It sounds like the grand jurors are having difficulty  
22 hearing. Are you having difficulty hearing me, the witness,  
23 or both?

24 GRAND JURORS. The witness.

25 MS. [REDACTED] So Detective [REDACTED] I'm going to ask

1 you to please keep your voice up. Try to shout into the  
2 microphone. Can you pull the microphone toward you? Lift  
3 it and pull it all the way up to you? Thank you. We left  
4 off reading at Page 10, line 12.

5 BY MS. [REDACTED]

6 Q. "From what [REDACTED] [REDACTED] told you, how did [REDACTED]  
7 work change once Maxwell arrived on the scene?"

8 A. "[REDACTED] described Epstein as being of more  
9 pleasant to work with prior to Maxwell coming into the  
10 picture. Once she came into the picture, he said things  
11 became more secretive. He wasn't allowed to be in the room  
12 with guests, wasn't allowed to talk with them, associate  
13 with them; it became a different environment."

14 MS. [REDACTED] Detective [REDACTED] I'm going to ask you  
15 to take the microphone and try to put it right under where  
16 your mouth would be when you're reading because as you're  
17 looking down, you're moving your mouth away from the  
18 microphone. Thank you. Picking back up at Page 10,  
19 line 20.

20 BY MS. [REDACTED]

21 Q. "You talked about some of the rules that were  
22 placed, changing. Were there any rule changes about eye  
23 contact once Maxwell began staying at the Palm Beach house?"

24 A. "Yes. [REDACTED] wasn't allowed to make eye contact  
25 with Epstein and others."

1 MS. [REDACTED] We're going to jump now to Page 11,  
2 Line 6.

3 BY MS. [REDACTED]

4 Q. "Shifting gears. I want to talk to you about  
5 someone else that you've interviewed during this  
6 investigation. During the course of this investigation,  
7 have you participated in interviews with an individual named  
8 [REDACTED]?"

9 A. "Yes."

10 Q. "So for these purposes, I'm just going to refer to  
11 her as [REDACTED]. Is that okay?"

12 A. "Yes."

13 Q. "How many times have you interviewed [REDACTED]?"

14 A. "Approximately five times."

15 Q. "If you could please just page through the next  
16 two slides in front of you? Are these photographs of  
17 [REDACTED]?"

18 A. "Yes."

19 Q. "Is it your understanding that these photographs  
20 depict [REDACTED] from approximately ages 13 to approximately  
21 17?"

22 A. "Yes, it does."

23 Q. "Okay. Let's take a look at some of those  
24 photographs. I'm going to publish the next slide. Is  
25 [REDACTED]'s date of birth [REDACTED]?"

1 A. "Yes."

2 Q. "Are these two photographs of [REDACTED]?"

3 A. "Yes, they are."

4 Q. "If you could turn to the second slide of  
5 photographs, are these also photographs of [REDACTED]?"

6 A. "Yes."

7 Q. "Based on your participation in this investigation  
8 and your interviews with [REDACTED], where was she living when  
9 she was approximately 14 years old?"

10 A. "She was living in Palm Beach, Florida."

11 Q. "Who was she living with when she was 14?"

12 A. "Her mother and her siblings."

13 Q. "What was her whole life like at that time?"

14 A. "At that time her father had passed away the year  
15 prior, so the family was struggling financially and having  
16 some difficulties."

17 Q. "What did [REDACTED]'s father do before he passed away?  
18 What was his profession?"

19 A. "He was involved in [REDACTED]. [REDACTED]

20 [REDACTED]."

21 Q. "Was [REDACTED] involved in [REDACTED]?"

22 A. "Yes, she was."

23 Q. "Were her siblings?"

24 A. "Yes."

25 Q. "What kinds of [REDACTED] were they involved in?"

1 A. "Singing. She was a singer."

2 Q. "Like, what kind of singer?"

3 A. "Opera."

4 Q. "In the summer of 1994, how old was [REDACTED]?"

5 A. "She was 13 going on 14."

6 Q. "You testified earlier that her birthday was in

7 [REDACTED]. So did she turn 14 in [REDACTED]?"

8 A. "Yes."

9 Q. "What did she do that summer?"

10 A. "She attended an arts camp at Interlochen Center  
11 for the Arts."

12 Q. "And is Interlochen summer arts program located in  
13 Michigan?"

14 A. "Yes."

15 Q. "Did [REDACTED] meet Jeffrey Epstein and  
16 Ghislaine Maxwell that summer?"

17 A. "Yes, she did."

18 Q. "Did she meet them at summer camp?"

19 A. "Yes."

20 Q. "What did she tell you about that?"

21 A. "She said that she was sitting at a picnic table  
22 with friends when Epstein and Maxwell walked by. They  
23 stopped to talk to her, engaged her in conversation, asked  
24 her if she liked her classes; her teachers. During that  
25 conversation she found out that she was also from Palm Beach

1 and that he said he gives scholarships to students."

2 Q. "How did they leave the conversation? Was there  
3 any contact information exchanged?"

4 A. "They asked for [REDACTED]'s phone number."

5 Q. "As part of your investigation have you attempted  
6 to gather records to corroborate that [REDACTED], Maxwell, and  
7 Epstein were all at that summer camp that summer?"

8 A. "Yes."

9 Q. "If you could turn to the next slide, please.  
10 Have you obtained records from Interlochen for the summer of  
11 1994?"

12 A. "Yes."

13 Q. "And what are we looking at on this slide?"

14 A. "This shows who -- some of the individuals that  
15 were there, were present for that camp in '94. On here is  
16 [REDACTED], [REDACTED]."

17 Q. "And have you investigated whether Maxwell and  
18 Epstein were also at Interlochen that summer of 1994 as  
19 [REDACTED] described?"

20 A. "Yes."

21 Q. "Based on your review of records from Interlochen,  
22 what is your understanding of Epstein's relationship with  
23 Interlochen?"

24 A. "My understanding was that he was a donor to the  
25 school."



1 Q. "Did he make any substantial donations?"

2 A. "He did."

3 Q. "Did he donate a lodge to the camp in the summer  
4 of 1994?"

5 A. "Yes, he did."

6 Q. "Did he have a long-standing relationship as a  
7 donor to Interlochen?"

8 A. "Yes."

9 Q. "Turning to the next slide. Is this an excerpt of  
10 a letter from Interlochen to Epstein?"

11 A. "Yes, it is."

12 Q. "And does this letter thank Epstein for donating a  
13 scholarship lodge?"

14 A. "Yes."

15 Q. "Does it invite Epstein to visit in August of  
16 1994?"

17 A. "Yes."

18 Q. "In 1994 did Epstein have a private jet?"

19 A. "Yes, he did."

20 Q. "Have you obtained the flight logs for that jet?"

21 A. "Yes."

22 Q. "Do those logs include passenger lists and the  
23 airport code for the airports the plane flew into and out  
24 of?"

25 A. "Yes."

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1 Q. "Turning to the next slide. Is this a page of the  
2 flight logs that you reviewed?"

3 A. "Yes."

4 Q. "And on this excerpt of the flight logs, where the  
5 red arrow is, is that a log entry showing an August 18, 1994  
6 flight to an airport with the airport code TBC?"

7 A. "Yes."

8 Q. "Is TBC the airport code for Cherry Capitol  
9 Airport in Traverse City, Michigan?"

10 A. "Yes, it is."

11 Q. "About how far is that airport from Interlochen by  
12 car?"

13 A. "About 25 minutes, give or take."

14 Q. "And who were the listed passengers on this  
15 flight?"

16 A. "Jeffrey Epstein, [REDACTED] (ph), and  
17 [REDACTED] (ph)."

18 Q. "Turning to the next slide. Is it the same  
19 excerpt just with a different arrow?"

20 A. "Yes."

21 Q. "Okay. So a few lines down is there a flight out  
22 of Traverse City just two days later, on August 20, 1994?"

23 A. "Yes."

24 Q. "And do the passengers listed in the flight out of  
25 Traverse City include the initials GM?"

1 A. "Yes, they do."

2 Q. "Are those Ghislaine Maxwell's initials?"

3 A. "Yes."

4 Q. "Have you obtained any records from Interlochen to  
5 indicate that Maxwell was at Interlochen in 1994?"

6 A. "Yes."

7 Q. "If we could turn to the next slide. Can you  
8 please explain for the grand jury what we're looking at on  
9 this slide?"

10 A. "This was a letter from Interlochen  
11 explaining -- addressed to Maxwell -- telling her that they  
12 had found an envelope in the lodge that they had been  
13 staying."

14 Q. "All right. We were talking a few minutes ago  
15 about how [REDACTED] described meeting Maxwell and Epstein at  
16 summer camp and you testified that she provided them with  
17 her phone number. Did [REDACTED] explain to you whether or not  
18 she had any contact with Epstein or Maxwell after she  
19 returned home to Palm Beach?"

20 A. "Yes."

21 Q. "When was the next time that happened?"

22 A. "Shortly thereafter."

23 Q. "And how did that occur?"

24 A. "She was invited to his house, so her and her  
25 mother went to Epstein's house to visit."

1 Q. "What did [REDACTED] tell you about that visit to  
2 Epstein's house with her mother?"

3 A. "She said it was -- wait, can you rephrase that?"

4 Q. "Of course. Did [REDACTED] go to the house by  
5 herself or with her mother?"

6 A. "With her mother."

7 Q. "Okay. When they went to the house what did they  
8 do there?"

9 A. "They had tea."

10 Q. "Who was there when they had tea at the house?"

11 A. "Epstein and Maxwell."

12 Q. "What did they discuss as they had tea?"

13 A. "They just talked about her life and, you know,  
14 what she wanted to do."

15 Q. "Did Epstein make any offers?"

16 A. "He said that he gives scholarships; he likes to  
17 mentor people."

18 Q. "How did [REDACTED]'s mother react when Epstein said  
19 this?"

20 A. "She was happy for her daughter and often times  
21 referred to Epstein as [REDACTED]'s godfather."

22 Q. "After that occasion when they went over to the  
23 house, thereafter, did [REDACTED] subsequently begin regularly  
24 spending time with Maxwell and Epstein at Epstein's house in  
25 Palm Beach?"

1 A. "Yes."

2 Q. "Did that start when she was approximately age  
3 14?"

4 A. "Yes."

5 Q. "Did it continue until she was about age 17?"

6 A. "Yes, it did."

7 Q. "And during those years does she regularly go over  
8 to Epstein's house in Palm Beach and spend time with Maxwell  
9 and Epstein?"

10 A. "Yes."

11 Q. "What happened in the summer of 1997 when [REDACTED]  
12 was 17, about to turn 18?"

13 A. "She moved to New York City."

14 Q. "Why did she move to New York City?"

15 A. "She wanted to pursue a career in acting and  
16 modeling."

17 Q. "We'll talk about that in a moment, but for now, I  
18 want to focus on the years you talked about, in Palm Beach,  
19 from the ages 14 to 17, when [REDACTED] would regularly go to  
20 Epstein's house. In the beginning, in the first few months  
21 when she went there, what kinds of things did she do when  
22 she would visit the house when Maxwell and Epstein were  
23 there?"

24 A. "They'd hang out by the pool. He -- they would  
25 take her to the movies, take her shopping. She described

1 that behavior as grooming."

2 Q. "When you say grooming, did she explain what she  
3 meant by that?"

4 A. "She meant that they were building a relationship  
5 with her, giving her things, taking her places, and then  
6 usually when the grooming happens, an offender will -- once  
7 they gain that trust -- they will make their relationship  
8 turn sexual."

9 Q. "Now you testified just a moment ago that [REDACTED]  
10 described to you that she felt at this time period they were  
11 grooming her, is that right?"

12 A. "Yes."

13 Q. "Is that something that she realized at the time  
14 when she was 14, or is that something she's described to you  
15 now?"

16 A. "Something she's described now. She didn't  
17 realize that at the time."

18 Q. "So we'll talk a little bit more about grooming in  
19 a moment, but just to give context, are you familiar with  
20 the term grooming based on your experience investigating  
21 crimes involving sexual exploitation of minors?"

22 A. "Yes."

23 Q. "Generally speaking, you were touching on this a  
24 moment ago, but if you could just explain it in full, what  
25 is grooming?"

1 A. "Grooming is when someone builds a relationship  
2 with a child. They will find a vulnerability or a need and  
3 then they work on gaining that child's trust. And then  
4 often times gaining a parent's trust. Once they have that  
5 trust, they show that in ways that they can care about them;  
6 like giving them gifts and promises. And then once that's  
7 established, they then turn the relationship sexual; often  
8 times, making sexual comments and normalizing the behavior."

9 Q. "Now during these visits that you've been  
10 describing, that [REDACTED] told you about, did [REDACTED] say whether  
11 Epstein ever gave her anything?"

12 A. "Yes, she did."

13 Q. "What did he give her?"

14 A. "He gave her cash. Sometimes he'd tell her to  
15 give the cash to her mom because he knew that they needed  
16 it. He paid for her voice lessons as well."

17 Q. "Now you were describing how [REDACTED] has  
18 characterized these visits now, but based on your  
19 conversations with her, at the time did she feel that these  
20 visits were strange at all?"

21 A. "She thought they were strange, but Maxwell  
22 normalized it for her. She was like a cool, older sister  
23 and made comments like, this is what grownups do."

24 Q. "You used the phrase cool, older sister. Is that  
25 a phrase that [REDACTED] used to describe how she felt about

1 Maxwell at the time, and what Maxwell was like?"

2 A. "Yes. Those are her words."

3 Q. "Did there come a time -- these visits -- when  
4 [REDACTED] saw Maxwell topless by the pool?"

5 A. "Yes."

6 Q. "What did she tell you about that?"

7 A. "She was a little taken back, but Maxwell just  
8 acted normal."

9 Q. "Did [REDACTED] tell you about an incident several  
10 months into this arrangement when she was alone with Epstein  
11 in the pool house?"

12 A. "Yes."

13 Q. "And when they were alone together, did Epstein  
14 ask [REDACTED] what she wanted to do with her life?"

15 A. "He did."

16 Q. "What did she say?"

17 A. "She said she wanted to be an actress and a  
18 model."

19 Q. "How did Epstein respond?"

20 A. "He told her that he was best friends with the  
21 owner of Victoria's Secret. Told her that she would have to  
22 have photographs taken and that she had to be comfortable in  
23 her underwear and not be a prude. When she was asked what  
24 she meant by that, he pulled her into his lap and  
25 masturbated."



1 Q. "What was her reaction?"

2 A. "She felt paralyzed. She froze."

3 Q. "After this incident did [REDACTED]'s encounters with  
4 Epstein begin to include sexual contact?"

5 A. "Yes."

6 Q. "Over time did the sexual abuse escalate?"

7 A. "It did."

8 Q. "From what she's described to you, did the abuse  
9 include Epstein digitally penetrating [REDACTED]?"

10 A. "Yes."

11 Q. "Did it include Epstein using a vibrator on her?"

12 A. "Yes."

13 Q. "Did she describe to you that there were times  
14 when Epstein would direct [REDACTED] to massage him while he  
15 masturbated?"

16 A. "Yes."

17 Q. "Did [REDACTED] explain to you what her memories are  
18 like of the abuse?"

19 A. "Yes."

20 Q. "What did she say about that?"

21 A. "She said that it happened so often that it all  
22 kind -- it all runs together for her. That it's hard to  
23 separate out some of the different instances of abuse."

24 Q. "You were describing how [REDACTED] explained to you  
25 that the abuse began. Did that occur, based on what [REDACTED]

1 told you, within the first year that she met Epstein and  
2 Maxwell?"

3 A. "Yes."

4 Q. "Now did [REDACTED] also describe to you that once this  
5 abuse started Epstein would also bring her into his massage  
6 room in his house?"

7 A. "Yes."

8 Q. "And were there times, where he did this, where  
9 there were other women present, including Maxwell?"

10 A. "Yes."

11 Q. "Was [REDACTED] abused during those episodes?"

12 A. "Yes, she was."

13 Q. "During these group encounters what were [REDACTED] and  
14 the adult women wearing?"

15 A. "They were usually just in their underwear."

16 Q. "Once they were all in the massage room, how would  
17 these episodes generally start?"

18 A. "They would generally start with one of the girls  
19 massaging Epstein. [REDACTED] was usually massaging his feet.  
20 Maxwell was kind of teasing the other girls. She'd grab the  
21 girl's breasts, and she would direct the girls on what to  
22 do."

23 Q. "When these episodes would start, in general, was  
24 Epstein generally lying face down on the massage table?"

25 A. "Yes."

1 Q. "What would happen as things progressed, generally  
2 speaking, from what she described to you?"

3 A. "When Epstein would decide he was kind of done  
4 with the regular massage, he would turn over on his back,  
5 and he'd grab whichever girl he wanted to, either, touch him  
6 or whatever girl he wanted to touch."

7 Q. "Did these episodes include sex acts that over  
8 time, in various instances, included Epstein masturbating,  
9 Epstein receiving oral sex, and Epstein engaging in  
10 intercourse?"

11 A. "Yes."

12 Q. "You were describing for a moment what [REDACTED] told  
13 you about Maxwell's role during these group encounters.  
14 Would Maxwell sometimes guide the women and give  
15 instructions about what to do?"

16 A. "Yes, she would."

17 Q. "What would [REDACTED] typically do during these  
18 episodes?"

19 A. "She would try not to look at Maxwell because she  
20 gave off that sister-vibe, so it felt weird for her. She  
21 would try to be invisible in the room so they would ignore  
22 her as much as possible."

23 Q. "In the beginning, when [REDACTED]'s approximately 14  
24 or 15, would she generally begin by just massaging Epstein's  
25 feet?"

1 A. "Yes."

2 Q. "Is that something she was told to do?"

3 A. "Yes."

4 Q. "Did she -- you mentioned that she tried to be  
5 invisible -- was -- I believe that was your testimony?"

6 A. "Yes."

7 Q. "And over time has she described to you that over  
8 time she believed she became more involved in the sexual  
9 activity which varied in each encounter?"

10 A. "Yes."

11 Q. "Were there times -- let me rephrase that. How  
12 did -- you touched on this for a moment, but just to be  
13 clear -- how did [REDACTED] describe Maxwell's attitude during  
14 these incidents?"

15 A. "It was very casual; she acted like this was  
16 normal. She gave off that vibe to her and yeah."

17 Q. "Did that make her feel more comfortable with what  
18 was happening?"

19 A. "It did."

20 Q. "Was [REDACTED] sometimes fully nude during these  
21 episodes?"

22 A. "Yes."

23 Q. "And during these episodes did the abuse include  
24 Epstein touching [REDACTED]'s breasts?"

25 A. "Yes."

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1 Q. "Did it include directing [REDACTED] to touch Epstein's  
2 genitals?"

3 A. "Yes."

4 Q. "Beginning when [REDACTED]'s approximately 14, does  
5 she begin to travel with Epstein and Maxwell to  
6 New York City on occasion?"

7 A. "Yes, she did."

8 Q. "Was that to the property you testified about  
9 earlier; the townhouse on the upper-east side?"

10 A. "Yes."

11 Q. "When [REDACTED] traveled to New York City, did she  
12 stay in Epstein's townhouse in New York City?"

13 A. "Yes, she did."

14 Q. "Did she recall that Maxwell and Epstein took her  
15 shopping on one of her early trips to New York City?"

16 A. "Yes."

17 Q. "Did she remember them buying her anything?"

18 A. "She recalled them buying her white cotton  
19 underwear. Her description was that they were like little  
20 girl's underwear."

21 Q. "From ages 14 to 17 did Epstein ask [REDACTED] to  
22 periodically fly to New York for weekends at that townhouse  
23 in New York?"

24 A. "I'm sorry, say it again?"

25 Q. "You testified that she began travelling to

1 New York City at age 14. Did she then periodically travel  
2 to New York City, in a similar manner, from ages 14 to 17?"

3 A. "Yes."

4 Q. "Were there times, when she travelled on those  
5 trips, when she flew on Epstein's private jet?"

6 A. "Yes."

7 Q. "Did she also sometimes fly commercially?"

8 A. "Yes, she did."

9 Q. "Was Maxwell sometimes present on the trips to New  
10 York?"

11 A. "Yes."

12 Q. "You testified earlier that [REDACTED] was sexually  
13 abused in Palm Beach. Did she describe to you that she was  
14 also sexually abused on these trips to New York?"

15 A. "Yes, she did."

16 Q. "Did Maxwell encourage [REDACTED] to go on these  
17 trips?"

18 A. "Yes."

19 Q. "What does [REDACTED] -- what did [REDACTED] tell you about  
20 her memory of how these trips were arranged?"

21 A. "She recalled that Maxwell was usually the one  
22 that would schedule her flights. If she was flying  
23 commercially she would schedule the flights, sometimes  
24 calling her mother to schedule."

25 Q. "Was that the general impression of how they were

1 arranged?"

2 A. "Yes."

3 Q. "In addition to the trips to New York City you  
4 just described, did [REDACTED] also remember travelling, at least  
5 once, to Epstein's ranch in New Mexico?"

6 A. "Yes, she did."

7 Q. "Does she remember whether or not she was sexually  
8 abused in New Mexico?"

9 A. "She couldn't recall. She couldn't remember."

10 Q. "In general, how would [REDACTED] get to the airport in  
11 Florida when she would fly on Epstein's jet; what did she  
12 describe to you?"

13 A. "Usually a driver; one of Epstein's drivers would  
14 pick her up from her house and take her to the airport."

15 Q. "Now you testified earlier that you reviewed  
16 flight records for Epstein's private jet, is that correct?"

17 A. "Yes."

18 Q. "And have you reviewed records from the 1990s to  
19 see if there -- whether there's a person named [REDACTED] listed  
20 on the records?"

21 A. "Yes."

22 Q. "Turning to the next slide. Is this an excerpt  
23 from those records?"

24 A. "Yes, it is."

25 Q. "And does the red arrow point to -- does the red

1 arrow point to a November 11th, 1996 flight?"

2 A. "Yes, it does."

3 Q. "And does this say -- does this flight log reflect  
4 that it was a flight from Palm Beach, Florida to Teterboro,  
5 New Jersey?"

6 A. "Yes."

7 Q. "Is there a private airfield in Teterboro,  
8 New Jersey?"

9 A. "Yes, there is."

10 Q. "What's it called?"

11 A. "Teterboro Airport."

12 Q. "Are the passengers listed on this entry JE?"

13 A. "Yes."

14 Q. "Are the -- do the entries also include  
15 (ph) plus friend, Jeff Shamf's (ph), family,

16 (ph), (ph), (ph), and (ph)?"

17 A. "Yes."

18 Q. "Was (ph), based on your awareness of (ph)'s  
19 date of birth and the date of this flight, was (ph) 16 on  
20 the date of this flight?"

21 A. "Yes, she was."

22 Q. "Turning to the next slide. You testified earlier  
23 about Teterboro Airport. What are we looking at on this  
24 slide?"

25 A. "This is directions from Teterboro Airport to



1 Epstein's residence here in Manhattan."

2 Q. "So based on your review of this map, if someone  
3 were to fly into Teterboro and travel to New York City,  
4 would they -- would the most natural route be to travel to  
5 Teterboro Airport and crossing into New York through  
6 Manhattan?"

7 A. "Yes."

8 Q. "Turning to the next slide. Is this also an  
9 excerpt from the flight records that you've reviewed?"

10 A. "Yes, it is."

11 Q. "And does this show a May 9, 1997 flight from  
12 Teterboro, New Jersey to Santa Fe, New Mexico?"

13 A. "Yes, it does."

14 Q. "And are the passengers listed on this log JE, GM,  
15 and [REDACTED]?"

16 A. "Yes."

17 Q. "Based on your knowledge of [REDACTED]'s birthdate and  
18 the date of this flight, would [REDACTED] have been 16 on the  
19 date of this flight?"

20 A. "Yes, she would have been."

21 Q. "Turning to the next flight -- slide. Is this  
22 also an excerpt from the flight records?"

23 A. "Yes."

24 Q. "And does the red arrow point to a flight entry on  
25 May 3, 1998?"

1 A. "Yes, it does."

2 Q. "Based on the airport codes, did this reflect that  
3 there is a flight on that date from Palm Beach, Florida to  
4 Teterboro, New Jersey?"

5 A. "Yes."

6 Q. "And are the passengers listed on this log JE, GM,  
7 ET, [REDACTED], Glenn (ph), [REDACTED] (ph), [REDACTED] (ph), Manny  
8 (ph), [REDACTED] (ph)?"

9 A. "Yes."

10 Q. "Based on your knowledge of [REDACTED]'s birthday and  
11 the date of this flight, would [REDACTED] have been 17 on this  
12 date?"

13 A. "Yes."

14 Q. "Am I correct that you testified earlier that in  
15 addition to sometimes flying on Epstein's private jet, she  
16 also travelled on commercial airlines, is that right?"

17 A. "Yes, it is."

18 Q. "Based on your review of these flight logs, does  
19 every flight entry list the name of every single passenger;  
20 or are there sometime when a passenger is noted female?"

21 A. "There's times where a passenger is just noted  
22 female."

23 Q. "I'm going to walk -- talk to you about two  
24 examples of that. Turning ahead two slides. Looking at  
25 Slide 18, does this reflect a January 3rd, 1995 flight where

1 the flight log says JE, two females?"

2 A. "Yes, it does."

3 Q. "And do the two entries below, also, just list  
4 female next to the initials JE?"

5 A. "Yes, they do."

6 Q. "Turning to the next slide, Slide 19. Is this  
7 another example of an entry like that; focusing on the entry  
8 on February 12, 1995?"

9 A. "Yes."

10 Q. "Does that entry also say, female?"

11 A. "Yes, it does."

12 Q. "Now, you testified that [REDACTED] sometimes flew on  
13 commercial airlines and that arrangements for her travel  
14 were made for her to fly commercially for these trips, is  
15 that right?"

16 A. "Yes."

17 Q. "Have you been able to obtain commercial flight  
18 records?"

19 A. "We tried. We were not able to obtain those  
20 records."

21 Q. "Why is that?"

22 A. "Airlines do not keep records past a certain  
23 year."

24 Q. "Does [REDACTED] recall group sexualized massages  
25 involving Epstein and Maxwell, in both the New York and

1 Florida residences, during the time period we've been  
2 talking about?"

3 A. "Yes."

4 Q. "You testified earlier about the time that Epstein  
5 and Maxwell would spend together and the activities that  
6 they were involved in. During this time period did [REDACTED]  
7 have occasions to talk with Maxwell?"

8 A. "She -- I'm sorry, can you ask the question  
9 again?"

10 Q. "During the beginning when she was 14, when she  
11 began spending time with Epstein and Maxwell, and through  
12 the years, did [REDACTED] often have conversations with Maxwell  
13 about her life?"

14 A. "Yes."

15 Q. "Did they talk about that often?"

16 A. "They did."

17 Q. "Did Maxwell ask [REDACTED] about her family, her  
18 classes, and other aspects of her life?"

19 A. "Yes, she did."

20 Q. "You testified earlier, just before she turned 18,  
21 [REDACTED] moved to New York City, is that right?"

22 A. "Yes."

23 Q. "Did she go to school there in New York City her  
24 senior year?"

25 A. "Yes, she did."

1 Q. "What school did she go to?"

2 A. "She went to the [REDACTED]."

3 Q. "What is the [REDACTED]?"

4 A. "They cater to individuals who want to pursue  
5 careers in the arts."

6 Q. "Have you reviewed records from the [REDACTED]  
7 [REDACTED]?"

8 A. "Yes."

9 Q. "If you could turn to Slide 17. Can you please  
10 explain for the grand jury what we're looking at here?"

11 A. "This is an excerpt from [REDACTED]'s application to  
12 the [REDACTED]. On it is listed, who is  
13 financially responsible for her, and that is  
14 Jeffrey Epstein."

15 Q. "From what [REDACTED] told you did Maxwell encourage  
16 [REDACTED] to accept Epstein's financial help?"

17 A. "Yes."

18 Q. "When [REDACTED] moved to New York City who was she  
19 living with?"

20 A. "She lived with her mother and her brother  
21 in -- [REDACTED] apartment."

22 Q. "Did Epstein help pay for her rent?"

23 A. "He did."

24 Q. "During that year, her senior year of high school,  
25 when she was in New York City, did [REDACTED] remain in contact

1 with Epstein?"

2 A. "Yes."

3 Q. "What was the nature of their contact like during  
4 that time period?"

5 A. "During this time he was still sexually abusing  
6 her."

7 Q. "Did that continue to occur at his townhouse in  
8 Manhattan that year?"

9 A. "Yes, it did."

10 Q. "What happened at the end of her senior year of  
11 high school?"

12 A. "She moved to Los Angeles to pursue a career in  
13 acting."

14 Q. "Did she get a job as an actress when she turned  
15 18?"

16 A. "She did."

17 Q. "Has [REDACTED] lived in Los Angeles and worked as an  
18 actress on television ever since then?"

19 A. "Yes."

20 Q. "After she moved to Los Angeles, did she continue  
21 being in touch with Epstein?"

22 A. "For a short period of time."

23 Q. "Did she ultimately break contact with him?"

24 A. "Yes, she did."

25 Q. "Is [REDACTED] currently pursuing a civil lawsuit

1 against Maxwell and Epstein's estate?"

2 A. "Yes."

3 Q. "Have you talked with [REDACTED] about whether, when  
4 she was a teenage girl and all of this was happening,  
5 whether she told anyone that she was being sexually abused?"

6 A. "Yes. She said she didn't tell anyone. She felt  
7 like she couldn't. She -- the -- nothing was talked about  
8 outside of that room, so it made it so that she couldn't  
9 talk about it. And then she also -- her mother is Middle  
10 Eastern, and her mother raised her that women are supposed  
11 to do what they're told even if someone is beating you.

12 When she was 13 and her father passed, she, she  
13 went to a guidance counselor at school to talk about it, and  
14 her mother found out about it and smacked her. She felt  
15 like she couldn't talk to anyone about it."

16 Q. "Did [REDACTED]'s mother encourage her to accept  
17 Epstein's financial assistance?"

18 A. "Yes, she did."

19 Q. "Have you become aware that in 2005 police  
20 officers from the Palm Beach Police Department executed a  
21 search warrant at Epstein's house at the  
22 El Brillo Way address in Palm Beach?"

23 A. "Yes."

24 Q. "Have you reviewed some of the materials seized  
25 during the search?"

1 A. "Yes."

2 Q. "Did they find massage tables and sex toys?"

3 A. "Yes, they did."

4 Q. "Did they find any photographs of [REDACTED]?"

5 A. "Yes."

6 Q. "Was one of the photographs signed by [REDACTED]?"

7 A. "Yes, it was."

8 Q. "Did it say, [REDACTED],  
9 [REDACTED]?"

10 A. "Yes."

11 Q. "During your interviews with [REDACTED], did [REDACTED] tell  
12 you how she felt about Epstein and Maxwell in the 90s when  
13 she was a young girl?"

14 A. "She did. She expressed that she felt like they  
15 loved her. She felt they were her family; that they  
16 supported her, and that they felt like -- she was made to  
17 feel that she was needed to be grateful to them."

18 Q. "Okay. Did she tell you that she felt like they  
19 were trying to help her?"

20 A. "Yes."

21 Q. "Have you talked with [REDACTED] about how she feels  
22 about this now?"

23 A. "Yes."

24 Q. "What was [REDACTED]'s demeanor like when she described  
25 to you what Epstein and Maxwell had done to her?"



1 A. "She was upset. She recognized that now. It's  
2 affected her life to a great degree. She's struggled in  
3 relationships with opening up to people and trusting people;  
4 both personal and professional relationships."

5 Q. "Did she tell you that she struggled to tell  
6 anyone what had happened to her for most of her adulthood?"

7 A. "Yes."

8 Q. "When was the first time you interviewed [REDACTED]?"

9 A. "Last fall."

10 Q. "Was that the first time she ever reported this to  
11 law enforcement?"

12 A. "Yes, it was."

13 Q. "Now you testified earlier about your interviews  
14 with [REDACTED] [REDACTED] who worked at Epstein's Palm Beach house.  
15 Did he remember a girl named [REDACTED] coming to the house  
16 during that time?"

17 A. "Yes, he did."

18 Q. "Did he recall [REDACTED], Maxwell, and Epstein meeting  
19 in the Palm Beach house together?"

20 A. "Yes."

21 Q. "What was his understanding of why [REDACTED] was  
22 there?"

23 A. "He thought that Epstein was helping her. That's  
24 what Epstein had told him, and [REDACTED] had told him that  
25 Epstein was helping her."

1 Q. "Did he ever observe Epstein interacting with  
2 [REDACTED] physically?"

3 A. "Yes."

4 Q. "What did he see?"

5 A. "He saw Epstein kiss [REDACTED]'s cheek and pat her on  
6 the bottom."

7 Q. "Did he have any knowledge about what was  
8 happening with Epstein or Maxwell when he wasn't present?"

9 A. "He didn't."

10 Q. "Did [REDACTED] ever recall picking up [REDACTED] from her  
11 house?"

12 A. "Yes."

13 Q. "And when he would pick her up from her house,  
14 would he then bring her back to the Palm Beach house?"

15 A. "Yes."

16 Q. "Did he remember who, in general, would tell him  
17 to pick up [REDACTED] from her house?"

18 A. "Maxwell would be the one to tell him to pick her  
19 up."

20 Q. "Did he recall ever driving [REDACTED] to the movies?"

21 A. "Yes."

22 Q. "What did he tell you about that?"

23 A. "That would usually be Epstein, Maxwell, and  
24 [REDACTED]; they would go to the movies, and it would usually be  
25 late at night."

1 Q. "Did he tell you about what his memory was about  
2 how old [REDACTED] was?"

3 A. "He said she was young, and that he knew that  
4 because he had picked her up from school, and that he knew  
5 she was too young to drive."

6 Q. "Switching gears. I want to talk to you about a  
7 different aspect of your interviews with [REDACTED] [REDACTED] Based  
8 on what he told about his job duties, were there ever times  
9 where he would have to clean Epstein's massage room?"

10 A. "Yes."

11 Q. "What did he tell you about that?"

12 A. "He said that he found sex toys in the massage  
13 room, and he had to wash them afterwards."

14 Q. "Aside from those experiences, was he aware if  
15 there were any sex toys in the house?"

16 A. "Yes. There was a basket of sex toys that were  
17 kept in Maxwell's closet."

18 Q. "Did [REDACTED] stop working for Epstein in  
19 approximately 2002?"

20 A. "Yes."

21 Q. "Was he told that he was being replaced?"

22 A. "Yes."

23 Q. "And was he generally aware that the person who  
24 replaced him was much younger?"

25 A. "Yes."

1 Q. "Did [REDACTED] tell you that a few months after he  
2 left working for Epstein he became suicidal because of  
3 issues in his marriage?"

4 A. "Yes."

5 Q. "Did he tell you that he went to Epstein's house  
6 and tried to take Epstein's gun?"

7 A. "Yes, he did."

8 Q. "Did he tell you that it's worth several thousand  
9 dollars?"

10 A. "Yes."

11 Q. "Did Epstein discover this and confront him about  
12 it?"

13 A. "Yes, he did."

14 Q. "Did [REDACTED] admit to Epstein and the police what  
15 he had done?"

16 A. "Yes."

17 Q. "Did Epstein also tell the police his gun was  
18 missing?"

19 A. "Yes."

20 Q. "Were there any charges filed?"

21 A. "No."

22 Q. "Was he ever arrested?"

23 A. "I don't believe so."

24 Q. "And did Epstein pursue any charges about this  
25 incident?"

1 A. "No. He didn't pursue anything."

2 Q. "Have you interviewed one of Epstein's former  
3 pilots?"

4 A. "Yes."

5 Q. "Is that pilot named David Rodgers?"

6 A. "Yes."

7 Q. "Was he one of the pilots for Epstein's private  
8 jet in the 1990s?"

9 A. "Yes."

10 Q. "Did he remember [REDACTED] travelling on the  
11 jet in the 90s?"

12 A. "He remembered her travelling, but he didn't  
13 remember specifics."

14 Q. "So just to be clear, is your testimony that he  
15 didn't remember the specific dates of the flights, but he  
16 remembered her travelling on the jet during the 1990s?"

17 A. "Yes."

18 Q. "And did he remember [REDACTED] specifically as  
19 a person who travelled?"

20 A. "Yes."

21 Q. "Did you discuss with him the flight records that  
22 we talked about earlier that lists a person named [REDACTED] as a  
23 passenger?"

24 A. "Yes."

25 Q. "Did he have a specific memory of those exact

1 flights?"

2 A. "No."

3 Q. "But was he aware of any other [REDACTED] flying on the  
4 jet, besides [REDACTED], in the 1990s?"

5 A. "No. No other [REDACTED] at the time."

6 Q. "Earlier, when we were looking at Interlochen  
7 attendance records for the summer of 1994, you noted that  
8 [REDACTED] was one of the names on that record, is that  
9 right?"

10 A. "Yes."

11 Q. "Is that [REDACTED]?"

12 A. "Yes."

13 Q. "Have you interviewed [REDACTED]?"

14 A. "Yes, I have."

15 Q. "Did he tell you that he remembered [REDACTED] talking  
16 that summer at camp about having met Jeffrey Epstein?"

17 A. "Yes."

18 Q. "Did he tell you that he remembered [REDACTED] going  
19 over to Epstein's house in Palm Beach when they were in high  
20 school?"

21 A. "Yes."

22 Q. "Did he remember that [REDACTED] would often talk about  
23 spending time with Maxwell and Epstein during this time?"

24 A. "Yes."

25 Q. "Did he remember [REDACTED] telling him they -- when

1 they were in high school -- about at least one trip to  
2 New York City that she took with Epstein?"

3 A. "Yes."

4 Q. "Did he remember [REDACTED] describing Epstein's  
5 townhouse in Manhattan?"

6 A. "Yes."

7 Q. "And does he remember [REDACTED] talking often about  
8 Ghislaine Maxwell?"

9 A. "Yes."

10 Q. "Now based on your interviews with [REDACTED], did he  
11 tell you whether he knew back then, when they were in high  
12 school, whether [REDACTED] was being sexually abused by Epstein?"

13 A. "He didn't know back then."

14 Q. "Did [REDACTED] ever meet Ghislaine Maxwell?"

15 A. "Yes, he did."

16 Q. "What did he remember about that?"

17 A. "He remembered Epstein, Maxwell, and [REDACTED] being  
18 near a movie theatre, and he was approximately 16 at the  
19 time and [REDACTED] would have been 15, and just the little bit  
20 of interaction they had. And then after that, [REDACTED] had  
21 told him that Maxwell had said something to the effect of, I  
22 could teach [REDACTED] a thing or two."

23 Q. "Is that something that he remembers [REDACTED] telling  
24 him back then, that Maxwell said?"

25 A. "Yes."

1 Q. "During the course of this investigation have you  
2 participated in any interviews with an individual named  
3 [REDACTED]?"

4 A. "Yes."

5 Q. "So for today's purposes, I'm just going to refer  
6 to her as [REDACTED]. How many times have you referred to  
7 (verbatim) [REDACTED]?"

8 A. "Approximately, twice."

9 MS. [REDACTED] Excuse me.

10 BY MS. [REDACTED]

11 Q. "How many times have you interviewed [REDACTED]?"

12 A. "Approximately twice."

13 Q. "Now does [REDACTED] know [REDACTED]? Have they  
14 ever met before as far as you know?"

15 A. "As far as I know, no."

16 Q. "Turning to the next slide. Are these photographs  
17 of [REDACTED] when she was in high school?"

18 A. "Yes."

19 Q. "And is her date of birth [REDACTED]?"

20 A. "Yes."

21 Q. "When [REDACTED] was approximately 16 and a junior in  
22 high school where was she living?"

23 A. "She was living in [REDACTED] with her mother."

24 Q. "Does she have any siblings?"

25 A. "An older sister."



1 Q. "What did her older sister do?"

2 A. "Her older sister lived -- worked for Epstein."

3 Q. "Where did she work for Epstein?"

4 A. "Here in New York."

5 Q. "Did there come a time, in approximately December  
6 1995, when [REDACTED] had a phone conversation with her sister  
7 about travelling to New York City?"

8 A. "Yes."

9 Q. "What did they discuss?"

10 A. "They discussed her coming to New York and meeting  
11 Epstein."

12 Q. "What did her sister tell [REDACTED] about why she  
13 should meet Epstein?"

14 A. "She said that he could help her with her  
15 college."

16 Q. "And did she say -- does the sister say whether  
17 the sister wanted her to meet Epstein, or did she say  
18 whether Epstein wanted to meet [REDACTED]?"

19 A. "Epstein wanted to meet [REDACTED]."

20 Q. "Now let me just pause here. You testified that  
21 this happened in approximately December of 1995. Just for  
22 context, the years that we were talking about with [REDACTED]  
23 [REDACTED], was that 1994 through 1997?"

24 A. "Yes."

25 Q. "So is this approximately the same time period

1 while what you described [REDACTED] telling you happened?"

2 A. "Yes."

3 Q. "So in January of 1996 did [REDACTED] fly on a  
4 commercial airline to New York City to spend a weekend with  
5 her sister and meet Jeffrey Epstein?"

6 A. "Yes."

7 Q. "Did she tell you that?"

8 A. "Yes."

9 Q. "During the trip did [REDACTED] tell you that she met  
10 Epstein at his townhouse in New York City?"

11 A. "Yes, she did."

12 Q. "Did she tell you that Epstein discussed her plans  
13 for college applications and offered to help her?"

14 A. "Yes."

15 Q. "What was [REDACTED]'s first impression of Jeffrey  
16 Epstein?"

17 A. "She was very impressed by him."

18 Q. "What did she -- what was her impression, based on  
19 this conversation, of what Epstein was going to do for her?"

20 A. "That he was going to help her with her future  
21 plans for college."

22 Q. "During that trip to New York City did she stay at  
23 Epstein's townhouse or at her sister's apartment?"

24 A. "Her sister's apartment."

25 Q. "During that trip did she tell you that she saw

1 Epstein a second time when he took [REDACTED] and her sister to  
2 the movies?"

3 A. "Yes."

4 Q. "What did she tell you happened at the movies?"

5 A. "She said that they were sitting in the theatre  
6 and Epstein was between [REDACTED] and her sister, and Epstein  
7 put his hand on her leg; he rubbed her arm and held her  
8 hands -- held hands with her."

9 Q. "From what she told you, what was her impression  
10 about whether her sister could see what was going on?"

11 A. "She felt like her sister couldn't see."

12 Q. "What was her reaction to this happening?"

13 A. "She was uncomfortable."

14 Q. "After the movie did she tell her sister what had  
15 happened?"

16 A. "No, she didn't."

17 Q. "Did she say why not?"

18 A. "She said that she knew [REDACTED], her sister, really  
19 liked Epstein and that Epstein could help them. So she  
20 didn't tell her."

21 Q. "After this trip did [REDACTED] go back home to  
22 [REDACTED]?"

23 A. "Yes."

24 Q. "Did Epstein contact her afterwards?"

25 A. "Yes."

1 Q. "Did he discuss with her, her ongoing college  
2 plans?"

3 A. "Yes, he did."

4 Q. "Did he invite her to a weekend at his ranch in  
5 New Mexico in the spring of 1996?"

6 A. "Yes."

7 Q. "Was she 16 at the time?"

8 A. "Yes, she was."

9 Q. "From what she told you, what was [REDACTED]'s  
10 impression of who would be on this trip to New Mexico?"

11 A. "She knew Maxwell would be there."

12 Q. "Did she -- was she told anyone else was going to  
13 be present during this trip?"

14 A. "She said that there would be like other students  
15 her -- kids her age."

16 Q. "And what was her understanding of who these other  
17 kids were and why they would be there? Sorry, let me --"

18 A. "Rephrase."

19 Q. "Rephrase that question. You testified that she  
20 was told that on this trip that there would be other  
21 students. Was she under the impression that there would be  
22 other students like her on the trip who were also being  
23 mentored by Epstein?"

24 A. "Yes."

25 Q. "Now you testified just a moment ago that she was

1 also told that Maxwell would be there. Are you referring to  
2 Ghislaine Maxwell?"

3 A. "Yes."

4 Q. "At the point that she was told that  
5 Ghislaine Maxwell would be on this trip, had she ever met  
6 Ghislaine Maxwell?"

7 A. "No, she hadn't."

8 Q. "Had she heard her sister talk about  
9 Ghislaine Maxwell?"

10 A. "Yes."

11 Q. "How did -- from what she described to you -- how  
12 did her expectation that Maxwell would be on this trip make  
13 her feel about the trip?"

14 A. "It made her comfortable. Her sister had talked  
15 highly of Maxwell."

16 Q. "Did [REDACTED] tell you that she flew to New Mexico  
17 that spring when she was 16?"

18 A. "Yes."

19 Q. "Did she meet Ghislaine Maxwell when she arrived  
20 in New Mexico?"

21 A. "Yes, she did."

22 Q. "How did she describe Maxwell's demeanor and  
23 attitude when she met her?"

24 A. "She described Maxwell as being very charming.  
25 She gave her a tour of the house, and Maxwell took [REDACTED]

1 shopping which made her feel special."

2 Q. "What does she remember talking about with  
3 Ghislaine Maxwell?"

4 A. "They talked about school, homework, trips."

5 Q. "Did she talk with her about applying to college?"

6 A. "Yes."

7 Q. "Did she talk about her classes in high school?"

8 A. "Yes."

9 Q. "Did she talk with her about the homework that she  
10 had to do that weekend?"

11 A. "Yes."

12 Q. "Did she talk with Maxwell about her family?"

13 A. "Yes."

14 Q. "Did she talk with her about her home life and  
15 living with her mother?"

16 A. "Yes."

17 Q. "From what [REDACTED] told you, when she got there, who  
18 else was at the ranch besides Ghislaine Maxwell and  
19 Jeffrey Epstein?"

20 A. "It was just them."

21 Q. "Was it just the three of them there the entire  
22 weekend of the visit?"

23 A. "Yes."

24 Q. "Were there any other school kids there?"

25 A. "No."

1 Q. "When they were at the ranch, from what [REDACTED] told  
2 you, did Maxwell say anything to [REDACTED] about massages?"

3 A. "Yes."

4 Q. "Did she say anything about -- to her about foot  
5 massages?"

6 A. "Yes."

7 Q. "What did [REDACTED] tell you about that?"

8 A. "Maxwell told [REDACTED] to give Epstein a foot massage  
9 and then showed her and instructed her on how to do it.

10 [REDACTED] was a little uncomfortable, but Maxwell was joking  
11 around so she just followed her lead."

12 Q. "Did [REDACTED] tell you what Maxwell and  
13 Epstein -- took her to the movies that weekend?"

14 A. "Yes."

15 Q. "What did she tell you about that trip to the  
16 movies?"

17 A. "She said that when they went outside the theatre  
18 Maxwell was joking around and pulled Epstein's pants down a  
19 little bit. And then once they went inside the theatre,  
20 Epstein, when they were sitting down, touched [REDACTED]'s leg,  
21 and rubbed her arm, held her hand. And that this time  
22 he -- [REDACTED] felt -- he wasn't trying to hide it from  
23 Maxwell.

24 Q. "What was [REDACTED]'s reaction to all of this?"

25 A. "She was uncomfortable."

1 Q. "During the same weekend was there another  
2 occasion when Maxwell talked about massages?"

3 A. "Yes."

4 Q. "What happened?"

5 A. "Maxwell had asked [REDACTED] if she had ever had a  
6 massage, and Maxwell told her she could give her one. So  
7 [REDACTED] was on her back, and Maxwell pulled the sheet down  
8 exposing her chest; she was nude from the top up and  
9 proceeded to massage around her chest and breast area."

10 Q. "From what [REDACTED] told you when she was describing  
11 to you what you just described to the grand jury, how did  
12 she feel while this was happening?"

13 A. "She felt really uncomfortable."

14 Q. "Did [REDACTED] also tell you about an incident that  
15 happened one morning when she was in New Mexico?"

16 A. "Yes."

17 Q. "What did she tell you happened?"

18 A. "She said that she was in bed, and Epstein came  
19 into the room and told her that he wanted to cuddle. So he  
20 laid down next to her and spooned her. She told him that  
21 she had to go to the bathroom to get out of the situation."

22 Q. "What was her reaction to that, when Epstein got  
23 into her bed?"

24 A. "She felt uncomfortable. She didn't know what to  
25 do."



1 Q. "Did [REDACTED] go back home to [REDACTED] when the  
2 weekend was over?"

3 A. "Yes, she did."

4 Q. "Did she tell anyone, when she got home, about  
5 what had happened?"

6 A. "No."

7 Q. "Is that for the same reason you described  
8 earlier?"

9 A. "Yes."

10 Q. "Did Epstein end up paying for [REDACTED] to go on a  
11 trip to Thailand that summer?"

12 A. "Yes."

13 Q. "Did [REDACTED] have any contact with Maxwell or  
14 Epstein after that trip?"

15 A. "Not that she recalled."

16 Q. "When you interviewed [REDACTED], what was her demeanor  
17 like when she described her interactions with  
18 Jeffrey Epstein and Ghislaine Maxwell?"

19 A. "She became upset and emotional."

20 Q. "Is [REDACTED] currently pursuing a civil lawsuit  
21 against Maxwell and Epstein's estate?"

22 A. "Yes, she is."

23 Q. "What does [REDACTED] do for a living now?"

24 A. "She's a psychologist who works with trauma  
25 victims."

1 Q. "During the course of this investigation have you  
2 interviewed someone named [REDACTED]?"

3 A. "Yes."

4 Q. "For today's purposes I'm just going to refer to  
5 her as [REDACTED]. How many times have you interviewed  
6 [REDACTED], approximately?"

7 A. "Approximately three times."

8 Q. "Turning to the next slide. Is this a photograph  
9 of [REDACTED] that she provided to you?"

10 A. "Yes."

11 Q. "And did she tell you that this was taken when she  
12 was in -- approximately 16 or 17 years old?"

13 A. "Yes."

14 Q. "Is [REDACTED]'s date of birth [REDACTED]?"

15 A. "Yes."

16 Q. "Did [REDACTED] grow up in England?"

17 A. "Yes, she did."

18 Q. "Did she tell you that there came a point where  
19 she met Ghislaine Maxwell when she was about 17?"

20 A. "Yes."

21 Q. "How did she tell you that they met?"

22 A. "She said they met through a mutual friend."

23 Q. "Did she tell you that this would have happened in  
24 around 1994 or 1995?"

25 A. "Yes."

1 Q. "And is that within the same time period that  
2 we've been talking about today?"

3 A. "Yes."

4 Q. "What happened after she was introduced to  
5 Ghislaine Maxwell, from what she told you?"

6 A. "She said Maxwell treated her like they were  
7 sisters. Her quote was 'like naughty school girls' is how  
8 Maxwell treated with her."

9 Q. "Did she tell you that Maxwell seemed to  
10 immediately take an interest in her?"

11 A. "Yes."

12 Q. "Did she tell you that they began spending time  
13 together in London?"

14 A. "Yes."

15 Q. "And just to be clear was Maxwell in her thirties  
16 while this is happening?"

17 A. "Yes."

18 Q. "Did Maxwell -- did [REDACTED] ever remember Maxwell  
19 ever talking about having a boyfriend named  
20 Jeffrey Epstein?"

21 A. "Yes."

22 Q. "What did she tell [REDACTED] about that?"

23 A. "Maxwell told [REDACTED] that Epstein was going to  
24 like her."

25 Q. "Did there come a time when she was 17 that

1 [REDACTED] described that Maxwell introduced her to  
2 Jeffrey Epstein?"

3 A. "Yes."

4 Q. "How did she describe that occurring?"

5 A. "Epstein had flown into London. He was at  
6 Maxwell's residence in London, and Maxwell had called  
7 [REDACTED] over. So [REDACTED] went over, and when she got there  
8 Maxwell was saying to Epstein, kind of -- the words [REDACTED]  
9 used was -- giving him a resume of her attributes, saying,  
10 she's so pretty, she's so strong; and then Maxwell asked her  
11 to give Epstein a massage."

12 Q. "Now you've testified just a moment ago that  
13 Maxwell -- that [REDACTED] described to you that Maxwell asked  
14 her to give Epstein a massage during this first meeting, is  
15 that correct?"

16 A. "Yes."

17 Q. "Did Maxwell state to her, in sum and substance,  
18 since you're so strong, I'd appreciate it if you'd give  
19 Jeffrey a massage because he needs a massage every day or I  
20 get in trouble?"

21 A. "Yes, she said that."

22 Q. "Is that what [REDACTED] said to you, in sum and  
23 substance?"

24 A. "Yes."

25 Q. "When that happened did [REDACTED] remember Maxwell

1 leading her to a room in the house?"

2 A. "Yes."

3 Q. "When [REDACTED] went in the room -- oh excuse me --  
4 what happened?"

5 A. "When [REDACTED] went in the room Epstein was in a  
6 robe. He took off his robe, and she started massaging him.  
7 And then he touched [REDACTED] and pulled her hand to his  
8 penis."

9 Q. "What does [REDACTED] remember Epstein saying when he  
10 did this?"

11 A. "Don't be frigid."

12 Q. "What was her reaction to this happening, from  
13 what she told you?"

14 A. "She was taken back by it."

15 Q. "When this episode ended and [REDACTED] left the  
16 room, did she tell that she remembered Maxwell being just  
17 outside the room when she left?"

18 A. "Yes."

19 Q. "Did she remember Maxwell saying to her, did you  
20 have fun? Did he like it?"

21 A. "Yes."

22 Q. "Does she remember Maxwell calling her several  
23 days afterwards, or at some short period of time  
24 afterwards?"

25 A. "Yes, she did."

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1 Q. "Did [REDACTED] remember Maxwell saying to her on the  
2 phone call, in sum and substance, well, aren't you a clever  
3 girl, Jeffrey was very impressed?"

4 A. "Yes."

5 Q. "Shortly after this incident does she remember  
6 Maxwell asking her to come back over to the house?"

7 A. "Yes."

8 Q. "And when she got there did she tell you she  
9 remembered Maxwell saying to her, in substance, thank God  
10 you're here, if it's not you or someone else it falls to  
11 me?"

12 A. "Yes."

13 Q. "Does she remember Maxwell bringing her up the  
14 stairs to the house on that occasion?"

15 A. "Yes, she did."

16 Q. "What does she remember happening when Maxwell  
17 opened the door to the room?"

18 A. "Epstein was standing there nude."

19 Q. "Does she remember Maxwell then saying, I'll leave  
20 you guys to it?"

21 A. "Yes."

22 Q. "After these first two encounters, did Epstein and  
23 Maxwell invite [REDACTED] to travel with them to  
24 Palm Beach, U.S. Virgin Islands, Paris, and New York, for  
25 the next several years?"

1 A. "Yes, they did."

2 Q. "Does she remember whether these trips began  
3 before or after her 18th birthday?"

4 A. "She couldn't remember specifically."

5 Q. "Before these trips started, you were describing  
6 earlier when [REDACTED] told you about the time she spent with  
7 Maxwell when they first met, when she was 17, is that right?"

8 A. "Yes."

9 Q. "During these conversations when she would spend  
10 time with Maxwell, did [REDACTED] remember talking with her  
11 about her life, and her family, and her personal  
12 circumstances, with Maxwell?"

13 A. "Yes."

14 Q. "Now you testified a moment ago that [REDACTED] told  
15 you that at some point she began travelling with Maxwell and  
16 Epstein, and she wasn't sure whether or not these trips  
17 started before she turned 18, is that right?"

18 A. "Yes."

19 Q. "Did [REDACTED] describe to you that Epstein sexually  
20 abused her during these trips, typically in the context of a  
21 sexualized massage?"

22 A. "Yes, he did."

23 Q. "Did Epstein give her money?"

24 A. "Yes."

25 Q. "Did she tell you that he would give her cash?"

1 A. "Yes."

2 Q. "Did she describe to you that the abuse included,  
3 among other things, Epstein groping her and using a massager  
4 device on her genitals?"

5 A. "Yes."

6 Q. "And was the massager device like a vibrator?"

7 A. "Yes, it was."

8 Q. "From what [REDACTED] told you, was Maxwell in the  
9 room during these encounters?"

10 A. "Maxwell wasn't in the room."

11 Q. "What did she tell you would typically happen when  
12 [REDACTED] left the room after these episodes; was Maxwell  
13 typically nearby?"

14 A. "Yes. She was usually right near the room."

15 Q. "Does she remember Maxwell asking her, after she'd  
16 leave the room from one of these sessions, how was it; is he  
17 happy?"

18 A. "Yes."

19 Q. "Did she also tell you that she remembers Maxwell  
20 telling her at some point, in sum and substance, you know  
21 how he is when he's not happy, and you know what makes him  
22 happy; he has to have sex all the time; he's like a super  
23 hero?"

24 A. "Yes, she said that."

25 Q. "Did [REDACTED] tell you about an incident that



1 occurred, after she turned 18, in Palm Beach when she was  
2 staying at the Palm Beach house?"

3 A. "Yes."

4 Q. "Did the incident she described to you involve a  
5 school-girl outfit?"

6 A. "Yes, it did."

7 Q. "Could you please describe for the grand jury what  
8 [REDACTED] told you about that incident?"

9 A. [REDACTED] said that Maxwell had shown her a bedroom  
10 and upon the bed was a school-girl outfit. Maxwell had told  
11 her -- when [REDACTED] confronted her about it -- and Maxwell  
12 said, well, I thought it would be adorable if you gave  
13 Jeffrey his tea in this; so [REDACTED] felt like she had to put  
14 it on. And so she put it on, took Epstein his tea, and  
15 Epstein then slapped her on the buttocks and reached under  
16 the skirt and touched her."

17 Q. "What was her demeanor like when she described  
18 this incident to you?"

19 A. "She was crying. She was very upset."

20 Q. "When [REDACTED] described seeing the school-girl  
21 outfit and talking to Maxwell about it, did she remember  
22 Maxwell telling her, don't be so frigid?"

23 A. "Yes."

24 Q. "Does she remember that later in the day, after  
25 she had delivered Epstein his tea and he assaulted her, does

1 she remember Maxwell telling her, I heard you did well?"

2 A. "Yes."

3 Q. "During the years that [REDACTED] was in contact with  
4 Maxwell and Epstein, did she remember whether Maxwell had  
5 ever asked her if she knew any other girls who could massage  
6 Epstein?"

7 A. "Yes."

8 Q. "Does she remember Maxwell saying, in sum and  
9 substance, do you know anyone who could give him a blowjob  
10 today, I don't feel like it?"

11 A. "Yes."

12 Q. "Does she remember Maxwell saying, when she asked  
13 her to bring other girls, that they have to look young at  
14 least?"

15 A. "Yes."

16 Q. "From your conversations with [REDACTED], did she  
17 tell you whether or not she ever brought any other girls?"

18 A. "[REDACTED] didn't bring any girls."

19 Q. "Did she tell you why not?"

20 A. "She didn't want anyone else to go through that."

21 Q. "From your interviews with [REDACTED], did she tell  
22 you that there came a time, when she was in her early  
23 twenties, when she stopped travelling with Maxwell and  
24 Epstein?"

25 A. "Yes."

1 Q. "Was she struggling with substance abuse at that  
2 point?"

3 A. "Yes, she was."

4 Q. "Did she tell you that she got sober in her  
5 twenties?"

6 A. "Yes, she did."

7 Q. "What is her current profession?"

8 A. "She runs a non-profit for people who struggle  
9 with addiction and trauma."

10 Q. "Did [REDACTED] provide you with several emails that  
11 she exchanged with Epstein in the early 2000s?"

12 A. "Yes, she did."

13 Q. "And were those emails very friendly in tone?"

14 A. "Yes, they were."

15 Q. "What did she say to you when you talked with her  
16 about those emails?"

17 A. "She said she didn't, at the time, want to  
18 acknowledge what was going on to her. That looking  
19 back -- on -- it's different."

20 Q. "Did your squad at the FBI execute a search  
21 warrant at Jeffrey Epstein's townhouse in Manhattan in July  
22 of 2019?"

23 A. "Yes."

24 Q. "Did you personally participate in the search of  
25 Epstein's residence?"

1 A. "Yes, I did."

2 Q. "Did the townhouse include a massage room?"

3 A. "Yes."

4 Q. "Have you yourself been in that massage room?"

5 A. "Yes, I have."

6 Q. "Could you please describe for the grand jury what  
7 that massage room looked like?"

8 A. "It was dark. It had dark draperies covering the  
9 windows. There was a massage table; there were oils, there  
10 was a handheld massager in there; along with handcuffs, a  
11 whip, and along with -- walls were nude photographs of young  
12 females."

13 Q. "I believe you testified a moment ago that [REDACTED]  
14 [REDACTED] told you that there was a time when Maxwell  
15 asked her to wear a school-girl outfit for Epstein when they  
16 were in Palm Beach. Did you find a school-girl outfit in  
17 Epstein's New York townhouse?"

18 A. "Yes, we did."

19 Q. "Where did you find it?"

20 A. "It was found in a room next to the massage room."

21 Q. "And to be clear did the FBI find sex toys during  
22 the search?"

23 A. "Yes."

24 Q. "What was found?"

25 A. "Butt plugs, dildo, and vibrators."

1 Q. "We've talked about three minor girls today;

2 [REDACTED], is that right?"

3 A. "Yes."

4 Q. "Have you reviewed the proposed indictment marked  
5 Grand Jury Exhibit 1?"

6 A. "Yes, I have."

7 Q. "Is [REDACTED] the individual referred to as Victim 1  
8 in the proposed indictment?"

9 A. "Yes."

10 Q. "Is [REDACTED] the individual referred to as Victim 2  
11 in the proposed indictment?"

12 A. "Yes."

13 Q. "Is [REDACTED] the individual referred to as Victim 3  
14 in the indictment?"

15 A. "Yes."

16 Q. "During all of Maxwell's interactions with the  
17 victims when they were underage girls, based on the  
18 timeframe and your knowledge of Maxwell's birthdate, was she  
19 in her thirties?"

20 A. "Yes, she was."

21 Q. "Just one moment. All right. Switching gears.  
22 Have you become aware that in or about 2016 Maxwell gave  
23 sworn testimony in a civil deposition in connection with a  
24 lawsuit?"

25 A. "Yes."

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1 Q. "Could you please explain for the grand jury, what  
2 is a deposition?"

3 A. "It is a statement made under oath."

4 Q. "And in the course of civil litigation is it  
5 common for witnesses or parties of the lawsuit to give a  
6 deposition, under oath, where they testify about the  
7 substance of the case?"

8 A. "Yes."

9 Q. "And is deposition testimony live, and in-person,  
10 and under oath?"

11 A. "Yes."

12 Q. "Is a court reporter present when a deposition  
13 takes place?"

14 A. "Yes."

15 Q. "Now before we talk about Maxwell's deposition  
16 testimony, I want to talk to you about the lawsuit that the  
17 testimony was about. Have you become aware that in or about  
18 2015 an individual named [REDACTED] filed a lawsuit  
19 against Ghislaine Maxwell here in the Southern District of  
20 New York?"

21 A. "Yes."

22 Q. "And was [REDACTED] suing Maxwell for defamation?"

23 A. "Yes, she was."

24 Q. "Was the lawsuit captioned [REDACTED]  
25 against Ghislaine Maxwell, the docket number 15CB 7433, here

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1 in the Southern District of New York?"

2 A. "Yes."

3 Q. "Generally speaking, in broader strokes, what was  
4 the lawsuit about; what was the claim that [REDACTED] was  
5 bringing against Maxwell?"

6 WITNESS. I'm sorry. What line are we on again?

7 MS. [REDACTED] Page 68, line 4.

8 WITNESS. [REDACTED] had stated that she had been  
9 sexually abused by Epstein and Maxwell as a minor. Maxwell  
10 came forward publically and called her a liar, so [REDACTED]  
11 sued her for defamation."

12 BY MS. [REDACTED]

13 Q. "So just a small legal instruction on this topic.  
14 Ladies and gentlemen, I instruct you that the allegations in  
15 the lawsuit are not being presented to you as evidence that  
16 those incidents occurred. I instruct you that you should  
17 not consider those allegations for their truth. Instead,  
18 the circumstances of the lawsuit are being presented to you  
19 so that you can consider the context of the case and the  
20 circumstances under which Maxwell made statements under  
21 oath. Turning back to the deposition, did Maxwell's  
22 deposition take place over two different days?"

23 A. "Yes."

24 Q. "On both days does she give testimony in  
25 Manhattan?"

1 A. "Yes, she did."

2 Q. "Is that where the deposition took place?"

3 A. "Yes."

4 Q. "And on both days was Maxwell sworn under oath?"

5 A. "Yes."

6 Q. "If you could flip through the remaining slides of  
7 the presentation, do those slides contain true and accurate  
8 excerpts of the transcript of that deposition?"

9 A. "Yes."

10 Q. "Turning to the next slide, is this the cover page  
11 of the transcript of the first deposition that took place on  
12 April 22, 2016?"

13 A. "Yes."

14 Q. "And does it have the case caption on it?"

15 A. "Yes, it does."

16 Q. "Turning to the next slide. Is this an excerpt  
17 from the transcript?"

18 A. "Yes."

19 Q. "I imagine the grand jurors can't read it from  
20 their seats so if you could read it with me, I'll read the  
21 questions, and if you could read the answers."

22 "'Did Jeffrey Epstein have a scheme to recruit  
23 underage girls for underage massages?'"

24 MS. [REDACTED] And it appears there was an objection  
25 from the lawyer.



1 BY MS. [REDACTED]

2 Q. "'If you know.'"

3 A. "'I don't know what you are talking about.'"

4 Q. "Just to be clear, was the question and  
5 answer -- is the answer here Maxwell's testimony?"

6 A. "Yes."

7 Q. "Just to be clear you testified earlier that [REDACTED]  
8 participated in sexualized massages with Epstein and  
9 Maxwell, is that right?"

10 A. "Yes."

11 Q. "And [REDACTED] was a minor when that occurred?"

12 A. "Yes."

13 Q. "And did you also testify earlier that  
14 Maxwell -- that [REDACTED] told you that Maxwell  
15 asked her to give Epstein massages when she was a minor?"

16 A. "Yes."

17 Q. "If you could turn to the next slide please. Is  
18 this another excerpt from that same deposition?"

19 A. "Yes, it is."

20 Q. "All right. I'll read the question and you can  
21 read the answer."

22 "'Was all the people, under the age of 18 that  
23 you've interacted at with, at any of Jeffrey Epstein's  
24 properties?'"

25 A. "'I'm not aware of anybody that I interacted with,

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1 other than, obviously, [REDACTED] who was 17 at this point.'"

2 Q. "Just to be clear, you testified earlier about two  
3 girls under the age of 18 who interacted with Maxwell at  
4 Epstein's properties, is that correct?"

5 A. "Yes."

6 Q. "And those individuals were [REDACTED] and [REDACTED]  
7 [REDACTED] who told you that, correct?"

8 A. "Yes, that's correct."

9 Q. "Turning to the next slide. Is this the cover  
10 page of the transcript from the deposition that took place  
11 on July 22, 2016?"

12 A. "Yes."

13 Q. "And again, was this Maxwell giving testimony as  
14 part of the testimony under oath here in Manhattan?"

15 A. "Yes."

16 Q. "If you could please turn to the next slide. Is  
17 that an excerpt -- are these two excerpts from that  
18 deposition?"

19 A. "Yes."

20 Q. "Again, I'll read the questions, if you could  
21 please read the answers."

22 "'Were you aware of the presence of sex toys or  
23 devices used in sexual activities in Mr. Epstein's  
24 Palm Beach house?'"

25 MS. [REDACTED] There is an objection from the

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1 lawyer.

2 WITNESS. "'No, no. Not that I recall.'"

3 BY MS. [REDACTED]

4 Q. "'Do you know whether Mr. Epstein possessed sex  
5 toys or devices used in sexual activities?'"

6 MS. [REDACTED] There's an objection from the lawyer.

7 WITNESS. "'No.'"

8 BY MS. [REDACTED]

9 Q. "Just to be clear you testified earlier that  
10 [REDACTED] [REDACTED] told you he found sex toys and a massager in  
11 Palm Beach and also that he had seen Maxwell had a basket of  
12 sex toys in her closet there, is that correct?"

13 A. "Yes, that's correct."

14 Q. "And is it correct you testified earlier that  
15 Epstein used a vibrator on [REDACTED], is that correct?"

16 A. "Yes, that's correct."

17 Q. "And did you also testify earlier that [REDACTED]  
18 [REDACTED] told you he did that as well?"

19 A. "Yes, that's correct."

20 Q. "And did you also testify earlier that sex toys  
21 were found by the police in the Palm Beach house in 2005, is  
22 that right?"

23 A. "Yes."

24 Q. "And did you also testify earlier that the FBI  
25 found sex toys in Epstein's New York City townhouse in

1 2019?"

2 A. "Yes, that's correct."

3 Q. "If you could please turn to the next slide. This  
4 is on Page 27. It says, are these also excerpts from that  
5 same deposition?"

6 A. "Yes."

7 Q. "Again, I'll read the questions if you could  
8 please read the answers."

9 Q. "'Other than yourself, and the blonde and brunette  
10 that you have identified as having been involved in  
11 three-way sexual activities, with whom did Mr. Epstein have  
12 sexual activities?'"

13 MS. [REDACTED] There's an objection from the lawyer.

14 WITNESS. "'I wasn't aware that he was having  
15 sexual activities with anyone when I was with him, other  
16 than myself.'"

17 BY MS. [REDACTED]

18 Q. "'I want to be sure that I'm clear. Is it your  
19 testimony that in the 1990s and 2000s you were not aware  
20 that Mr. Epstein was having sexual activities with anyone  
21 other than yourself and the blonde and brunette on those few  
22 occasions when they were involved with you?'"

23 A. "'That is my testimony. That is correct.'"

24 Q. "Have you reviewed the deposition transcript?"

25 A. "Yes."

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1 Q. "In full? Now the excerpt we just read has the  
2 reference to a blonde and a brunette. Are those individuals  
3 completely different from the individuals we've been talking  
4 about today?"

5 A. "Yes."

6 Q. "Just to be clear, is it correct that you  
7 testified earlier that [REDACTED] and [REDACTED] told you that  
8 Epstein sexually abused them repeatedly, is that correct?"

9 A. "Yes."

10 Q. "And did you also testify earlier that Maxwell was  
11 occasionally present when Epstein was abusing [REDACTED], based  
12 on what she told you?"

13 A. "Yes, that's correct."

14 Q. "Turning to the next slide. Is this also an  
15 excerpt from the same deposition?"

16 A. "I'm sorry?"

17 Q. "I'm so sorry. Turning to the next slide, on  
18 Page 28. Is this also an excerpt from the same deposition?"

19 A. "Yes."

20 Q. "Thank you. Okay. Again, if we could read that  
21 together. I'll take the question and you can take the  
22 answer."

23 Q. "'Let's just tie that down. Is it your testimony  
24 that you've never given anybody a massage?'"

25 A. "'I've not given anyone a massage.'"

1 Q. "'You never gave Mr. Epstein a massage? Is that  
2 your testimony?'"

3 A. "'That is my testimony.'"

4 Q. "'You never gave [REDACTED] a massage? Is that  
5 your testimony?'"

6 A. "'I never gave [REDACTED] a massage.'"

7 Q. "Just to be clear, as you testified earlier, is it  
8 correct that [REDACTED] told you that Maxwell gave her a  
9 massage when they were in New Mexico?"

10 A. "Yes."

11 MS. [REDACTED] We're going to stop the read back  
12 there. Ladies and gentlemen, let's take a five minute break  
13 and we'll come back to finish the presentation in about five  
14 minutes. With the Foreperson's permission, I will ask that  
15 the witness please be excused.

16 FOREPERSON. Yes, he may.

17 MS. [REDACTED] Thank you.

18 (Witness Temporarily Excused)

19 (Time noted: 11:21 a.m.)

20 (Recess taken)

21

22

23

24

25

1 (Colloquy Precedes)

2 (Witness Resumes)

3 (Time Noted: 11:34 a.m.)

4 BY MS. [REDACTED]

5 Q. Welcome back, Detective.

6 A. Thank you.

7 Q. I have placed in front of you what has been marked  
8 as Grand Jury Exhibit 5. Do you recognize that?

9 A. I do.

10 Q. Is this a PowerPoint presentation concerning some  
11 of the facts and evidence that you have gathered in your  
12 investigation?

13 A. Yes.

14 Q. Did you participate in preparing this Exhibit in  
15 connection with your testimony today?

16 A. Yes.

17 Q. Will it assist you in testifying today?

18 A. Yes.

19 Q. Then we're going to have it up on the screen and  
20 we'll use it as you testify. During the course of this  
21 investigation have you participated in multiple interviews  
22 with an individual named [REDACTED]?

23 A. Yes.

24 Q. Did those interviews take place in the year 2020  
25 and the year 2021?

1 A. Yes.

2 Q. Were there approximately five of those interviews  
3 in total?

4 A. Yes.

5 Q. For today's purposes I'm going to refer to her as  
6 [REDACTED] Have you also reviewed reports from other law  
7 enforcement interviews for [REDACTED]

8 A. Yes.

9 Q. And is your testimony today based on both the  
10 review of those reports and your personal participation in  
11 interviews with [REDACTED]

12 A. Yes.

13 Q. Turning to the next slide. Are these photographs  
14 of [REDACTED]

15 A. Yes.

16 Q. Did [REDACTED] tell you approximately how old she was  
17 in one of these photographs?

18 A. Yes.

19 Q. Which photograph did she identify?

20 A. The one on the right.

21 Q. Where is the one on the right from, according to  
22 [REDACTED]

23 A. Oh, I'm sorry. That was from her MySpace page.

24 Q. And about how old did [REDACTED] recall being in this  
25 photograph from her MySpace page?



1 A. Sixteen years old.

2 Q. What is [REDACTED] date of birth?

3 A. [REDACTED].

4 Q. Where was [REDACTED] living when she was about 14  
5 years old?

6 A. West Palm Beach, Florida.

7 Q. What was [REDACTED] home life like when she was 14  
8 years old?

9 A. It was troubled. She grew up -- she had been  
10 molested multiple times as a child. Her mother was addicted  
11 to drugs and alcohol. Her parents were separated, she often  
12 fought with her brother and her mother.

13 Q. When [REDACTED] was 14 years old, did she have a  
14 boyfriend?

15 A. Yes.

16 Q. What was his name?

17 A. [REDACTED].

18 Q. How old was [REDACTED] when they were dating  
19 when [REDACTED] was 14 years old?

20 A. Approximately 17.

21 Q. So was [REDACTED] about three years older than [REDACTED]

22 A. Yes.

23 Q. Did there come a time when [REDACTED] learned of and  
24 met Jeffrey Epstein?

25 A. Yes.

1 Q. According to [REDACTED] how did that happen?

2 A. Her boyfriend [REDACTED] was friends with someone named  
3 [REDACTED] (ph) who was dating [REDACTED]

4 The four of them would often hang out together.

5 On one particular occasion [REDACTED] was asked by them and  
6 [REDACTED] if she would like to make some money by massaging  
7 an older man.

8 Q. How did [REDACTED] respond?

9 A. She agreed to do it.

10 Q. About what year does [REDACTED] remember this  
11 conversation taking place?

12 A. 2001.

13 Q. So how old was [REDACTED] at that time?

14 A. Fourteen.

15 Q. During your investigation have you learned of  
16 [REDACTED] date of birth?

17 A. Yes.

18 Q. How old was [REDACTED] at the time of the  
19 conversation with [REDACTED] in 2001, about massaging an old  
20 guy?

21 A. Seventeen.

22 Q. After that conversation with [REDACTED] did [REDACTED]  
23 meet Epstein?

24 A. Yes.

25 Q. What did [REDACTED] remember happening the first time

1 she met Epstein?

2 A. She was brought there by [REDACTED] She recalls  
3 going in through the side door and being introduced to  
4 Maxwell as they entered.

5 Q. Based on her interactions with Maxwell, as she and  
6 [REDACTED] entered, what was [REDACTED] understanding of  
7 whether [REDACTED] and Maxwell had met before?

8 A. She understood that they had met before.

9 Q. And did Maxwell, in substance, tell [REDACTED] to  
10 show [REDACTED] what to do?

11 A. Yes.

12 Q. What happened next?

13 A. They went upstairs to the massage room. They set  
14 up the massage room, waited for Epstein to enter. At that  
15 point they participated in giving him a massage.

16 Q. How did [REDACTED] describe the massage room in the  
17 Florida house?

18 A. She described it as having a few doors inside of  
19 it, some of them entering a closet. She described there  
20 being a -- it's like a bathroom, basically, that had a sink  
21 inside of it. And inside of the closet had a massage table  
22 which they had to take out in order to set it up.

23 Q. What, if any, photographs did [REDACTED] recall  
24 seeing in and around the massage room?

25 A. She recalls nude photographs of Maxwell.

1 Q. And of other females?

2 A. Yes.

3 Q. After [REDACTED] and [REDACTED] had set up the massage  
4 table, what happened next?

5 A. Jeffrey Epstein came into the room; they massaged  
6 him. At some point during the massage he turned over and  
7 [REDACTED] got on top. They had sex, and [REDACTED] sat on the  
8 couch and tried not to watch.

9 Q. According to [REDACTED] did [REDACTED] and  
10 Jeffrey Epstein engage in sexual intercourse during that  
11 massage?

12 A. Yes.

13 Q. At the end of the massage what happened?

14 A. Jeffrey left, they got dressed, and each got paid,  
15 and they walked downstairs. They got paid \$300 each.

16 Q. So to clarify, did [REDACTED] and [REDACTED] each  
17 receive \$300?

18 A. Yes.

19 Q. And how did they receive that money; in what  
20 denomination?

21 A. Crisp one hundred dollar bills.

22 Q. After that first visit did [REDACTED] go to Epstein's  
23 Palm Beach residence on multiple occasions to provide  
24 sexualized massages to Jeffrey Epstein between 2001 and  
25 2004?



1 A. Yes.

2 Q. Approximately how many times does [REDACTED] estimate  
3 she massaged Jeffrey Epstein?

4 A. About one hundred times.

5 Q. Do [REDACTED] memories of the events at Epstein's  
6 residence run together after that first visit with [REDACTED]

7 A. Yes.

8 Q. At some point after her first or second visit to  
9 Epstein's residence, did [REDACTED] give her phone number to  
10 someone at Epstein's house?

11 A. Yes.

12 Q. After that did [REDACTED] go to Epstein's house by  
13 herself without [REDACTED] accompanying her?

14 A. Yes.

15 Q. After [REDACTED] provided her phone number, how did  
16 she schedule times to massage Epstein at his house?

17 A. She would either call herself or she would receive  
18 a phone call.

19 Q. Did [REDACTED] explain why she would call herself to  
20 ask to schedule a time to massage Epstein?

21 A. Yes. At the time she wanted to make more money so  
22 she could buy drugs.

23 Q. During her time seeing Epstein did [REDACTED] become  
24 addicted to certain drugs?

25 A. Yes.

1 Q. What drugs was she primarily using?

2 A. Cocaine and marijuana.

3 Q. When someone would call [REDACTED] to schedule her  
4 for massages with Epstein, who does [REDACTED] remember making  
5 those calls?

6 A. Maxwell or [REDACTED].

7 Q. And were there particular time periods, over the  
8 course of the years when [REDACTED] was interacting with  
9 Epstein, that one or the other of those two individuals  
10 would call?

11 A. Yes.

12 Q. What did [REDACTED] say about that?

13 A. She recalled that for the first several months of  
14 going to Epstein she would get calls primarily from Maxwell.  
15 After that, she would receive calls primarily from [REDACTED],  
16 but at the same time, occasionally receiving calls from  
17 Maxwell.

18 Q. And did she also remember receiving calls from  
19 other Epstein employees whose names [REDACTED] did not know?

20 A. Yes.

21 Q. Did [REDACTED] refer to Maxwell as Maxwell?

22 A. Yes.

23 Q. And then you mentioned another person; what was  
24 the other person's name?

25 A. [REDACTED].

1 Q. And did she primarily refer to [REDACTED] -- did  
2 [REDACTED] primarily refer to [REDACTED] as [REDACTED]?

3 A. Yes.

4 Q. Who was [REDACTED], according to [REDACTED]

5 A. She was another employee of Epstein's. She was an  
6 assistant who made phone calls, arranged massage  
7 appointments, and took photographs.

8 Q. When Maxwell would call [REDACTED] to schedule  
9 massage appointments with Epstein, did Maxwell ever tell  
10 [REDACTED] where Maxwell was calling from?

11 A. Yes.

12 Q. What did [REDACTED] remember about that?

13 A. She recalls her saying that they were in New York,  
14 and that they would be travelling to Florida at a certain  
15 time period and asking if she would be available for that  
16 time when they return.

17 Q. And when you say "they" would be in New York, who  
18 was [REDACTED] referring to?

19 A. Epstein and Maxwell.

20 Q. So did [REDACTED] understand from these conversations  
21 that Maxwell and Epstein, at the time of those phone calls,  
22 were in New York?

23 A. Yes.

24 Q. What phone numbers would Epstein's employees call  
25 to schedule appointments for [REDACTED] to massage Epstein?

1 A. They would call multiple phone numbers, including  
2 [REDACTED] cell phone, her mother's phone, her landline, or  
3 her home line, and her boyfriend [REDACTED]'s phone.

4 Q. How did [REDACTED] get to Epstein's residence for  
5 each massage appointment?

6 A. She would either be driven by her boyfriend; she  
7 would drive herself on occasion even though she did not have  
8 a license; she had been driven there by [REDACTED] and also  
9 Epstein or Maxwell would send him -- send her a cab -- to be  
10 picked up.

11 Q. Did [REDACTED] boyfriend [REDACTED] ever meet anyone at  
12 Epstein's house?

13 A. Yes.

14 Q. What did [REDACTED] remember about that?

15 A. She recalls that he met Epstein.

16 Q. What did she say about that?

17 A. He met in the driveway. There was a car that  
18 Epstein was driving at the time and that he was showing to  
19 [REDACTED]. And she recalls that [REDACTED] really liked the car, and  
20 she had to hear about him talking about the car for several  
21 days to weeks after that.

22 Q. According to [REDACTED] did [REDACTED] ever meet any of  
23 Epstein's employees?

24 A. No.

25 Q. When [REDACTED] arrived at Epstein's house for each



1 appointment, what happened when she first arrived?

2 A. She would arrive through the side door and  
3 generally be greeted by someone.

4 Q. Would that be in the kitchen?

5 A. Yes.

6 Q. Does she recall, at times, Maxwell being the  
7 person who would greet her in the kitchen?

8 A. Yes.

9 Q. After being greeted in the kitchen, what would  
10 [REDACTED] do next?

11 A. She would go upstairs and arrange the massage room  
12 and the massage table.

13 Q. Once [REDACTED] was in the massage room, what  
14 happened during each appointment?

15 A. Epstein would generally come out, he would get on  
16 the table. She would begin her massage. During the massage  
17 he would flip over and she would generally play with  
18 nipples. He would masturbate, he would touch her breasts  
19 and buttocks, and she said that every instance ended with  
20 Epstein ejaculating.

21 Q. What would [REDACTED] be wearing during these  
22 appointments?

23 A. At first she just started wearing her underwear  
24 but was told that she would make more money to be completely  
25 nude, so she started getting totally nude.

1 Q. And so after her first few visits to Epstein's,  
2 was she -- did it become [REDACTED] practice to be fully nude  
3 during the massages?

4 A. Yes.

5 Q. On a few occasions during these massages did  
6 Epstein touch [REDACTED] vagina?

7 A. Yes.

8 Q. On one occasion does [REDACTED] recall Epstein  
9 touching her vagina with a vibrator?

10 A. Yes.

11 Q. And you mentioned that [REDACTED] recalled each  
12 massage ended with Epstein ejaculating; so is it [REDACTED]  
13 recollection that every single massage she performed for  
14 Epstein involved a sex act?

15 A. Yes.

16 Q. After each massage, what happened?

17 A. Epstein would get up, [REDACTED] would get dressed;  
18 she would get paid. The money would generally be on the  
19 table or on the sink, or she would go downstairs and be paid  
20 by Maxwell.

21 Q. How much did [REDACTED] recall being paid for each  
22 massage?

23 A. Three hundred dollars.

24 Q. In what denomination?

25 A. One hundred dollar bills.

1 Q. You mentioned that [REDACTED] would sometimes be  
2 greeted by Maxwell when she arrived at Epstein's house.  
3 Earlier on in her visits to Epstein's, would Maxwell engage  
4 [REDACTED] in conversation?

5 A. Yes.

6 Q. And then later on, after [REDACTED] started primarily  
7 being the person to schedule these appointments, would  
8 Maxwell still be present sometimes?

9 A. Yes.

10 Q. But during those later periods would Maxwell  
11 primarily just say hello and not really have extended  
12 conversations with [REDACTED]

13 A. Yes.

14 Q. During the earlier period when [REDACTED] was going  
15 over to Epstein's Palm Beach house, what types of  
16 conversations does she recall having with Maxwell?

17 A. She talked with Maxwell about her home life. She  
18 talked with Maxwell about her abuse that occurred when she  
19 was younger. She recalled Maxwell asking about her sexual  
20 experiences that she's had. She recalled Maxwell asking her  
21 if she used a vibrator or a toy ever on herself.

22 Q. Did she also recall conversations about travel?

23 A. Yes.

24 Q. I'd like to go through each of those topics that  
25 [REDACTED] recalled discussing. First, what did [REDACTED] tell

1 Maxwell about [REDACTED] home life in response to Maxwell's  
2 questions?

3 A. She told her that she -- her mother was addicted  
4 to drugs and that she had been molested several times as a  
5 child.

6 Q. Did she also tell Maxwell that the parents were  
7 separated?

8 A. Yes.

9 Q. You also mentioned sexual topics coming up. What  
10 does [REDACTED] recall about the time or times when sexual  
11 topics came up with Maxwell?

12 A. Maxwell has asked her if she was sexually active.  
13 [REDACTED] had told her that she's currently sexually active  
14 with her boyfriend. Maxwell asked her if she'd ever used a  
15 toy to pleasure herself, and she had said no.

16 Q. Did [REDACTED] recall that, the same day that Maxwell  
17 asked about whether she ever used a toy, was the day that  
18 Epstein placed a vibrator on [REDACTED] genitals during the  
19 massage?

20 A. Yes.

21 Q. What did [REDACTED] recall about conversations with  
22 Maxwell about travel?

23 A. She recalls that on multiple occasions Maxwell  
24 asked her if she wanted to travel, specifically, overseas.  
25 She had told her that she was 14 years old and that her

1 mother wouldn't let her. Maxwell offered to get her a  
2 passport so she would be able to travel.

3 Q. When you said "she had told her that she was  
4 14 years old," did you mean that [REDACTED] told Maxwell that  
5 [REDACTED] was 14 years old?

6 A. Yes.

7 Q. Does [REDACTED] recall that these conversations took  
8 place when she was about 14 years old?

9 A. Yes.

10 Q. Does [REDACTED] recall Maxwell saying specifically  
11 where Maxwell wanted [REDACTED] to travel with Epstein?

12 A. No.

13 Q. Did Epstein ever invite [REDACTED] to travel with  
14 him?

15 A. Yes.

16 Q. What did [REDACTED] remember about that?

17 A. They were similar conversations where she had  
18 told -- he had asked her if she would like to travel and  
19 said that [REDACTED] had also travelled with him. She  
20 had told him that she was 14 and, likely, her mother  
21 wouldn't let her travel. He had also offered to get her a  
22 passport.

23 Q. Did [REDACTED] ever actually travel with Maxwell or  
24 Epstein?

25 A. No.

1 Q. After [REDACTED] told Maxwell and Epstein that she  
2 was 14 years old, did Maxwell still call her to schedule  
3 massage appointments for Epstein?

4 A. Yes.

5 Q. Did [REDACTED] still see Maxwell at the Palm Beach  
6 residence after telling Maxwell that she was 14 years old?

7 A. Yes.

8 Q. Did Maxwell ever see [REDACTED] naked?

9 A. Yes.

10 Q. In particular does [REDACTED] recall that there were  
11 between one and three times when Maxwell saw her naked?

12 A. Yes.

13 Q. How did that happen, according to [REDACTED]

14 A. It happened in the massage room.

15 Q. And was there one time, in particular, when  
16 [REDACTED] recalls Maxwell touching her while [REDACTED] was  
17 naked?

18 A. Yes.

19 Q. What did [REDACTED] remember about that?

20 A. She recalls being in the massage room undressing;  
21 Maxwell complimented her body and then asked if her breasts  
22 were real, at which point, she touched her breasts.

23 Q. And when you say "she touched her breasts," do you  
24 mean Maxwell touched [REDACTED] breasts?

25 A. Yes.



1 Q. And on those occasions, just to be clear,  
2 according to [REDACTED] why was she getting undressed in the  
3 massage room when Maxwell was present?

4 A. For getting prepared for the massage with  
5 Jeffrey Epstein.

6 Q. Other than during her first visit or two with  
7 [REDACTED] did [REDACTED] ever participate in massages with  
8 Epstein during which another female was in the room?

9 A. Yes.

10 Q. In particular does she recall two occasions when  
11 Epstein brought another girl into the room?

12 A. Yes.

13 Q. Would you please describe for the grand jury what  
14 [REDACTED] recalled about one such occasion?

15 A. She recalled that the girl looked like a model.  
16 She recalls at one point during the massage Jeffrey Epstein  
17 attempted to have sex with her; he slightly penetrated her  
18 at least once or twice, that she can recall; she told him  
19 no, at which point he began to have sex with the other  
20 female and at the same time she was performing oral on  
21 [REDACTED]

22 Q. Now just to clarify some of the pronouns there.  
23 You said that Epstein attempted to penetrate, or have sexual  
24 intercourse, with her; do you mean that [REDACTED] recalls that  
25 Epstein attempted to penetrate [REDACTED] vagina with his

1 penis?

2 A. Yes.

3 Q. Does [REDACTED] recall Epstein attempting to do that  
4 and actually inserting his penis into her vagina on one or  
5 two occasions?

6 A. Yes.

7 Q. And in response, did [REDACTED] say no?

8 A. Yes.

9 Q. And in response to that did Epstein then engage in  
10 sexual intercourse with the other girl?

11 A. Yes.

12 Q. And at the same time was the other girl performing  
13 oral sex on [REDACTED]

14 A. Yes.

15 Q. Was there another instance where Epstein brought a  
16 different girl into the room?

17 A. Yes.

18 Q. What did [REDACTED] remember happening during that  
19 other instance?

20 A. Similar instance where Epstein would have sex with  
21 the other female at the same time while she was performing  
22 oral on [REDACTED]

23 Q. So Epstein would have intercourse with the other  
24 girl and the other girl would perform oral sex on [REDACTED]

25 A. Yes.



1 Q. Did [REDACTED] ever bring other girls to massage  
2 Epstein?

3 A. Yes.

4 Q. Why did she do that?

5 A. She was told she could earn more money.

6 Q. Who told her, or asked her, to bring other girls?

7 A. Both Jeffrey and Maxwell.

8 Q. What, in particular, did they ask her to do?

9 A. They asked if she could bring younger girls.

10 Q. Did [REDACTED] in fact, bring multiple girls over to  
11 Epstein's house?

12 A. Yes.

13 Q. Can she remember the name of every girl that she  
14 brought over?

15 A. No.

16 Q. Are there some examples of names that she  
17 remembers of girls that [REDACTED] brought over?

18 A. Yes.

19 Q. What are some examples?

20 A. [REDACTED] (ph) and [REDACTED].

21 Q. According to [REDACTED] was [REDACTED] younger than  
22 [REDACTED]

23 A. Yes.

24 Q. And according to [REDACTED] was [REDACTED] about a year  
25 older than [REDACTED]

1 A. Yes.

2 Q. When [REDACTED] brought these girls would Epstein  
3 engage in sex acts, in the presence of both [REDACTED] and the  
4 girls she had brought, during the massage?

5 A. Yes.

6 Q. After each massage would both [REDACTED] and the girl  
7 get paid?

8 A. Yes.

9 Q. How much did [REDACTED] remember them getting paid?

10 A. Three hundred dollars.

11 Q. So did each, [REDACTED] and the girl, get \$300?

12 A. Yes.

13 Q. Did [REDACTED] receive any gifts from Epstein?

14 A. Yes.

15 Q. What's an example of some gifts that she remembers  
16 receiving from Epstein?

17 A. Flowers, a book called "Massage for Dummies," and  
18 Victoria's Secret underwear.

19 Q. Does she recall receiving multiple packages of  
20 Victoria's Secret lingerie?

21 A. Yes.

22 Q. Before she first received Victoria's Secret  
23 lingerie, did Maxwell ask her for her address and her bra  
24 size?

25 A. Yes.

1 Q. How does [REDACTED] remember receiving packages of  
2 Victoria's Secret underwear?

3 A. She recalls receiving them at her house in West  
4 Palm Beach.

5 Q. And how would they get to her house?

6 A. Either FedEx or UPS.

7 Q. What, if anything, does [REDACTED] remember about the  
8 return address on those packages?

9 A. She recalls that they stated they were from New  
10 York.

11 Q. Does she remember whose name was on the return  
12 address?

13 A. She recalls Jeffrey's and Maxwell's name.

14 Q. What did [REDACTED] do with the money she made  
15 massaging Epstein?

16 A. She used it to purchase drugs.

17 Q. Did she and her boyfriend then use those drugs?

18 A. Yes.

19 Q. Did [REDACTED] continue going to school after she met  
20 Jeffrey Epstein?

21 A. No.

22 Q. About how old was she when she dropped out?

23 A. About 14.

24 Q. Was she in middle school when she dropped out?

25 A. Yes.

1 Q. So did [REDACTED] ever attend high school?

2 A. No.

3 Q. In or about 2003 did [REDACTED] become pregnant with  
4 her boyfriend [REDACTED]?

5 A. Yes.

6 Q. Did [REDACTED] continue to massage Epstein after she  
7 became pregnant, until she began showing her pregnancy?

8 A. Yes.

9 Q. Did [REDACTED] give birth to her son in 2004, when  
10 [REDACTED] was about 17 years old?

11 A. Yes.

12 Q. After the birth of her son did [REDACTED] still  
13 massage Epstein on a small number of occasions?

14 A. Yes.

15 Q. What did [REDACTED] tell you about that?

16 A. She was doing it to -- excuse me -- support her  
17 baby.

18 Q. Was that because she needed the money?

19 A. Yes.

20 Q. Have you reviewed the proposed superseding  
21 indictment marked Grand Jury Exhibit 6?

22 A. It's not in front of me right now, but I have  
23 reviewed it.

24 Q. Have you reviewed the proposed superseding  
25 indictment or would you like me to provide you with a copy?

1 A. Yes, I reviewed it.

2 Q. Is [REDACTED] the individual referred to as  
3 Minor Victim 4 in the proposed superseding indictment?

4 A. Yes.

5 Q. Before you began investigating Epstein and his  
6 associates was there a prior investigation by a different  
7 FBI office in Florida into Jeffrey Epstein?

8 A. Yes.

9 Q. During that investigation was [REDACTED] interviewed  
10 in 2007?

11 A. Yes.

12 Q. Have you reviewed a report from that interview?

13 A. Yes.

14 Q. During that interview did [REDACTED] describe  
15 providing numerous paid sexualized massages to Epstein at  
16 his Palm Beach residence when she was underage?

17 A. Yes.

18 Q. Did [REDACTED] mention Maxwell at all during that  
19 interview?

20 A. No.

21 Q. During your more recent interviews with her in  
22 2021 did [REDACTED] explain why she did not mention Maxwell  
23 during her 2007 interview?

24 A. Yes.

25 Q. What did she say about that?

1 A. She was not asked.

2 Q. She was not asked about Maxwell?

3 A. Correct.

4 Q. Did she think that Maxwell was important to the  
5 interview in 2007?

6 A. No.

7 Q. Did [REDACTED] sue Jeffrey Epstein in approximately  
8 2008?

9 A. Yes.

10 Q. Was she deposed, as part of that law suit, in  
11 2009?

12 A. Yes.

13 Q. Have you reviewed a transcript of that deposition?

14 A. Yes.

15 Q. During that deposition in 2009 did [REDACTED] state  
16 that Maxwell was one of the people who would call her to  
17 schedule massage appointments with Epstein?

18 A. Yes.

19 Q. Was [REDACTED] asked any other questions about  
20 Maxwell, or any follow-up questions about Maxwell, during  
21 that 2009 deposition?

22 A. No.

23 Q. After that deposition did the law suit settle?

24 A. Yes.

25 Q. During her more recent interviews did [REDACTED]

1 admit that she lied during her 2009 deposition?

2 A. Yes.

3 Q. And in particular, in her 2021 interviews did  
4 [REDACTED] tell you that after she stopped seeing Epstein she  
5 began working for an escort service?

6 A. Yes.

7 Q. During her 2021 interviews did [REDACTED] admit that,  
8 as part of that escort service, she engaged in paid sex acts  
9 with men?

10 A. Yes.

11 Q. Now, during her 2009 deposition was [REDACTED] asked  
12 about her time working for an escort service?

13 A. Yes.

14 Q. Did she lie and claim that she had engaged in no  
15 sex acts and only non-sexual dates as part of that escort  
16 service?

17 A. Yes.

18 Q. Did she explain why she lied during her  
19 deposition?

20 A. Yes.

21 Q. What did she say about that?

22 A. She was embarrassed.

23 Q. Was she ashamed to admit that she had worked as a  
24 prostitute, during her deposition?

25 A. Yes.

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1 Q. Has [REDACTED] struggled with drug addiction in the  
2 years since her time with Epstein?

3 A. Yes.

4 Q. Did she, in particular, become addicted to cocaine  
5 and crack cocaine?

6 A. Yes.

7 Q. Was she also in a car crash after which she was  
8 prescribed opioids?

9 A. Yes.

10 Q. And did she become addicted to opioids?

11 A. Yes.

12 Q. Between the ages of 18 and 26 was [REDACTED] arrested  
13 and convicted, on multiple times including misdemeanors and  
14 felonies, for crimes arising out of her drug use, such as  
15 drug possession and traffic violations?

16 A. Yes.

17 Q. Was her last felony an incident involving stolen  
18 property when she pawned an Xbox that belonged to one of  
19 [REDACTED]'s friends?

20 A. Yes.

21 Q. As a result of that conviction did [REDACTED] spend  
22 several weeks in jail?

23 A. Yes.

24 Q. And was that the longest jail sentence she had  
25 ever served?



1 A. Yes.

2 Q. After [REDACTED] was released from that jail sentence  
3 did she go into drug treatment and obtain mental health  
4 treatment?

5 A. Yes.

6 Q. Was that several years ago?

7 A. Yes.

8 Q. What does [REDACTED] do now?

9 A. She's a stay-at-home mother.

10 Q. Is she married?

11 A. Yes.

12 Q. To someone other than [REDACTED]?

13 A. Yes.

14 Q. Does she have three young children with her  
15 current husband?

16 A. Yes.

17 Q. Does he work while she takes care of the kids?

18 A. Yes.

19 Q. Has [REDACTED] received treatment for depression,  
20 anxiety, PTSD, and schizophrenia, among other mental health  
21 issues?

22 A. Yes.

23 Q. As for her schizophrenia, does that manifest in  
24 [REDACTED] hearing voices telling her that someone's going to  
25 take her children away and hurt her children?

1 A. Yes.

2 Q. Does [REDACTED] believe that that comes from a fear  
3 that what happened to her as a child could happen to her  
4 children?

5 A. Yes.

6 Q. Is [REDACTED] able to tell the difference between  
7 those voices and reality?

8 A. Yes.

9 Q. Does she take medication to help her not hear  
10 those voices?

11 A. Yes.

12 Q. Does [REDACTED] currently take multiple medications  
13 to help her manage her drug addiction and her mental health  
14 issues?

15 A. Yes.

16 Q. Do those include Methadone, Xanax, and medical  
17 marijuana?

18 A. Yes.

19 Q. Is [REDACTED] currently, or has she ever, sued  
20 Maxwell?

21 A. No.

22 Q. Does she have any plans to do so?

23 A. No.

24 Q. Have you identified evidence that corroborates  
25 [REDACTED] account of her time interacting with Epstein and

1 Maxwell?

2 A. Yes.

3 Q. Did you interview [REDACTED] ex-boyfriend,  
4 [REDACTED]?

5 A. Yes.

6 Q. What is the current nature of [REDACTED] and [REDACTED]  
7 relationship?

8 A. They have a child in common, and they talk very  
9 minimally just because they have a child in common.

10 Q. So do they only speak when necessary to discuss  
11 their teenage son?

12 A. Yes.

13 Q. According to [REDACTED] were he and [REDACTED]  
14 dating when [REDACTED] was about 14 years old and Shawn was  
15 about 17 years old?

16 A. Yes.

17 Q. Did [REDACTED] remember that he, [REDACTED] and  
18 [REDACTED] and [REDACTED] would hang out around  
19 that time?

20 A. Yes.

21 Q. What did [REDACTED] recall about how [REDACTED] came to  
22 meet Jeffrey Epstein?

23 A. He recalls that the four of them were hanging out,  
24 and they had mentioned -- [REDACTED] and [REDACTED] had mentioned  
25 to them that [REDACTED] could go to massage an old man and she

1 would be paid money in return for that.

2 Q. After that what does [REDACTED] remember happening?

3 A. He recalls that [REDACTED] went to Epstein's house,  
4 with [REDACTED] to do the massage.

5 Q. Did [REDACTED] recall bringing [REDACTED] to Epstein's  
6 Palm Beach residence on multiple occasions?

7 A. Yes.

8 Q. Did [REDACTED] remember receiving phone calls to  
9 schedule appointments for [REDACTED] to massage Epstein?

10 A. Yes.

11 Q. What, if anything, did [REDACTED] remember about  
12 meeting Jeffrey Epstein?

13 A. He recalls meeting him at his house -- Epstein's  
14 house; he recalls that Epstein was there with his car, and  
15 he was showing off his car; he recalls that Epstein was  
16 flashy.

17 Q. What, if anything, did [REDACTED] remember [REDACTED]  
18 saying about Maxwell?

19 A. He recalls that [REDACTED] said Maxwell was rude and  
20 nasty and that she was supposed to be teaching her how to do  
21 massages.

22 Q. What did [REDACTED] remember doing with the money that  
23 [REDACTED] received from Epstein?

24 A. They purchased drugs; [REDACTED] and [REDACTED].

25 Q. [REDACTED] and [REDACTED] would purchase drugs?

1 A. Yes.

2 Q. What did [REDACTED] understand was happening when  
3 [REDACTED] was at Epstein's Palm Beach residence?

4 A. He understood that she was going in there to give  
5 massages to Epstein but felt that there may have also been  
6 something else going on.

7 Q. What did [REDACTED] remember about [REDACTED] bringing  
8 other girls to Epstein's residence?

9 A. He recalls that she had brought other girls.

10 Q. Did he remember that both [REDACTED] and the other  
11 girls would get paid for going to Epstein's house?

12 A. Yes.

13 Q. Turning to the next slide. During the prior  
14 investigation into Epstein did the other FBI office obtain  
15 certain Federal Express records regarding Epstein?

16 A. Yes.

17 Q. Was there one in particular from October of 2002  
18 that is up on the slide right now?

19 A. Yes.

20 Q. Would you please walk the grand jury through what  
21 we see on this slide?

22 A. Sure. On the left-hand side it says, picked up  
23 October 7th of 2002. The sender's address is on the bottom.  
24 In the middle it says, Jeffrey E. Epstein; his address is  
25 457 Madison Avenue, New York, New York. It was sent

1 to -- the recipient being -- [REDACTED] [REDACTED],

2 [REDACTED].

3 Q. And is [REDACTED] name spelled [REDACTED] instead of  
4 [REDACTED] in the recipient column?

5 A. Yes.

6 Q. And the 457 Madison Avenue address, is that in  
7 Manhattan?

8 A. Yes.

9 Q. How old was [REDACTED] on October 7, 2002?

10 A. Fifteen.

11 Q. Have you interviewed a man named [REDACTED] [REDACTED]

12 A. Yes.

13 Q. Is that the same man about whom we read back  
14 testimony from Special Agent [REDACTED] earlier today?

15 A. Yes.

16 Q. To remind the grand jury, did [REDACTED] [REDACTED] work for  
17 Epstein in the 1990s and early 2000s at Epstein's Palm Beach  
18 residence?

19 A. Yes.

20 Q. Did [REDACTED] recall meeting [REDACTED] [REDACTED]

21 A. Yes.

22 Q. What did [REDACTED] remember about how he first met

23 [REDACTED] [REDACTED]

24 A. He recalls driving Maxwell to a massage  
25 appointment at Mar-a-Lago. He was told to wait in the car

1 while she got her massage. When she was done she got in the  
2 car and they started leaving the property. At some point  
3 during that drive, while still on the property, she was --  
4 asked him to stop. She got out of the car and approached a  
5 female who was wearing a uniform at the time. Maxwell spoke  
6 to that female for about 20 minutes, and Mr. [REDACTED] could  
7 not hear the conversation. Maxwell then got back in the car  
8 and drove back to Epstein's house. Shortly thereafter,  
9 later that day, that same girl arrived at the house. She  
10 soon became a regular at the house, and [REDACTED] learned --  
11 later learned -- her name to be [REDACTED] [REDACTED]

12 Q. And when [REDACTED] said that [REDACTED] [REDACTED] became  
13 a regular at the house, what was [REDACTED] understanding of  
14 why [REDACTED] [REDACTED] was coming to Epstein's Palm Beach  
15 residence?

16 A. To give Epstein massages.

17 Q. Turning to the next slide. Have you reviewed  
18 flight records for Jeffrey Epstein's private jet?

19 A. Yes.

20 Q. Do those show multiple flights that  
21 [REDACTED] [REDACTED] was on when she was under the age of 18?

22 A. Yes.

23 Q. Was Maxwell present for some of those flights with  
24 [REDACTED] [REDACTED]

25 A. Yes.

1 Q. Are two such flights reflected on this slide?

2 A. Yes.

3 Q. I'd like to ask you to please walk the grand jury  
4 through those two flight records.

5 A. On December 11th and December 14th of 2000, you  
6 can see all the way at the bottom of the page, on the  
7 left-hand side it's marked 11 and 14; the first flight goes  
8 from PBI to Teterboro, which is Palm Beach in Florida and  
9 Teterboro is in New Jersey. On that flight was Epstein,  
10 Maxwell, and [REDACTED] [REDACTED] among others. The next  
11 flight, on the 14th, goes from Teterboro to the  
12 Virgin Islands. On that flight is Epstein, Maxwell,  
13 [REDACTED] among others.

14 Q. Based on your understanding of [REDACTED] [REDACTED]  
15 date of birth, how old was [REDACTED] on these two flights?

16 A. Seventeen.

17 Q. Turning to the next slide. Does this slide show  
18 three additional flights that [REDACTED] [REDACTED] took with  
19 Jeffrey Epstein and Ghislaine Maxwell when she was 17 years  
20 old?

21 A. Yes.

22 Q. Would you please walk the grand jury through these  
23 three flights?

24 A. Sure. The first flight is January 26, 2001. On  
25 that flight is Jeffrey Epstein, Maxwell, and



1 [REDACTED] [REDACTED] among others. That was from Teterboro to  
2 Palm Beach.

3 Down a little bit further there's another date  
4 that appears to be January 28th of 2001, although the 8  
5 seems like it's a little faded, but does appear to be late  
6 January 2001. On that flight is Jeffrey Epstein,  
7 Ghislaine Maxwell, and [REDACTED] [REDACTED] among others.

8 And the last flight is the 30th of January, also  
9 2001; this flight's had Jeffrey Epstein, Ghislaine Maxwell,  
10 and [REDACTED] [REDACTED] on that flight.

11 Q. Based on your review of flight records for  
12 Jeffrey Epstein's private jet have you found multiple  
13 additional flights in 2001 that [REDACTED] [REDACTED] took with  
14 Epstein and Maxwell when she was still 17 years old?

15 A. Yes.

16 Q. Have you reviewed certain phone records from the  
17 year 2004?

18 A. Yes.

19 Q. Did those phone records show that on at least two  
20 occasions in April and May of 2004 an employee of Epstein's  
21 called [REDACTED] phone number?

22 A. Yes.

23 Q. Turning to the next slide. During the prior  
24 investigation of Epstein was there a search executed at  
25 Epstein's Palm Beach residence in 2005 by the Palm Beach

1 Police Department?

2 A. Yes.

3 Q. During that search did the police recover message  
4 pads from the residence?

5 A. Yes.

6 Q. Would you please explain to the grand jury what  
7 message pads are?

8 A. Sure. So message pads, in this particular  
9 instance, were pads that Epstein kept next to each of his  
10 phones in his residence. If someone was to call, whoever  
11 would answer that phone would jot down a note as to who the  
12 person was that was calling, who they were asking for, the  
13 time and date, and their phone numbers, and any specific  
14 message they wanted to leave.

15 Q. Have you reviewed the message pads that were  
16 recovered from Jeffrey Epstein's Palm Beach residence in  
17 2005?

18 A. Yes.

19 Q. Do those message pads include several messages  
20 with [REDACTED] name and/or phone number on them?

21 A. Yes.

22 Q. Do those message-pad excerpts date between the  
23 years 2003 and 2005?

24 A. Yes.

25 Q. Up on this slide right now, are those two examples

1 of message-pad excerpts that reference [REDACTED]

2 A. Yes.

3 Q. Would you please walk the grand jury through these  
4 message pad excerpts?

5 A. Sure. The first one says the message is for  
6 Mr. Epstein. The date is 3/1/2003.

7 Q. I'm sorry, I think you said 3/1, did you mean  
8 3/11?

9 A. I'm sorry. It's a little faded. 3/11/2003. The  
10 message is from [REDACTED] and the phone number -- also a  
11 little faded here -- but says, [REDACTED]. The second message  
12 says it's for JE, Jeffrey Epstein; the date is March 16,  
13 2003; the message is from [REDACTED]; same number as the  
14 previous message is [REDACTED]. The message on the bottom  
15 says she wants to work.

16 Q. And just to remind the grand jury, did [REDACTED]  
17 tell you that there were times when she would call to ask to  
18 massage Epstein so that she could get more money for drugs?

19 A. Yes.

20 Q. Turning to the next slide. Are these additional  
21 message pad excerpts seized from Jeffrey Epstein's  
22 Palm Beach residence in 2005?

23 A. Yes.

24 Q. Would you please walk the grand jury through  
25 these?

1 A. Sure. The first one on the left says the message  
2 is for JE, Jeffrey Epstein. It's from [REDACTED] [REDACTED].  
3 There's -- the date is missing on this one, but it says the  
4 time is 12:30. The phone number is [REDACTED]. The one  
5 on the right says the message is also, again, JE for  
6 Jeffrey Epstein. There's no date; the time is 3:15 p.m.  
7 It's from [REDACTED] [REDACTED], phone number [REDACTED]. The  
8 message states, [REDACTED] wants to work.

9 Q. During the search in 2005 of Epstein's Palm Beach  
10 residence were additional messages recovered that are not  
11 included on these slides?

12 A. Yes.

13 Q. Additionally, were multiple massage tables seized  
14 from the residence in 2005?

15 A. Yes.

16 Q. Was at least one of those tables manufactured  
17 outside of the state of Florida?

18 A. Yes.

19 Q. Have you reviewed photographs and a video  
20 recording from that 2005 search of the Palm Beach residence?

21 A. Yes.

22 Q. Would you please describe for the grand jury,  
23 based on those photographs and that video, what the massage  
24 room in the Palm Beach residence looked like?

25 A. Sure. It was basically a master bathroom. There

1 was glass doors which appear to go back into a shower.  
2 There's a sink in the room; there is a couch in the room;  
3 there's several door in the room, one of which leads into a  
4 closet. Inside of the closet on the walls, also on the  
5 walls of the massage room, there were multiple photographs,  
6 some of them being of nude women.

7 Q. Was there also a massage table in that closet?

8 A. Yes. Photographed was a massage table inside of  
9 the closet.

10 Q. Have you told the grand jury everything you know  
11 about this case, or have you merely answered the questions  
12 that I've asked you?

13 A. I've merely answered the questions.

14 Q. When you testified about conversations you had  
15 with others, or documents you reviewed, did you testify to  
16 the exact words or just the substance?

17 A. Just the substance.

18 Q. And are you willing to return to the grand jury if  
19 the grand jurors have additional questions for you?

20 A. Of course.

21 MS. [REDACTED] Then with the Foreperson's permission  
22 I'll ask that the witness please be excused.

23 FOREPERSON. Yes, he may.

24 MS. [REDACTED] Thank you.

25 (Witness Excused)

1 (Time Noted: 12:15 p.m.)  
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C E R T I F I C A T E

I hereby certify that the foregoing is a true and accurate transcription, to the best of my skill and ability, from my electronic notes of this proceeding.

April 5, 2021  
Date

  
  \_\_\_\_\_  
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