

1
2
3 UNITED STATES GRAND JURY

4 SOUTHERN DISTRICT OF NEW YORK

5x UNITED STATES OF AMERICA :

6 -V-

: November 19, 2019 Additional

7 GHISLAINE MAXWELL
8 (2018R01618) :

9 -X

10 United States Courthouse
11 300 Quaroppas Street
White Plains, New York

12 June 29, 2020
13 10:04 a.m.

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

15 [REDACTED]
Assistant United States Attorney

16 [REDACTED]
17 Assistant United States Attorney

18
19
20
21
22
23 [REDACTED]
24 Acting Grand Jury Reporter

25
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1 (Colloquy Precedes)

2 (Witness Enters Room)

3 (Time Noted: 10:16 a.m.)

4 [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. Morning.

10 Q. Can you please state your full name for the
11 record?

12 A. [REDACTED].

13 Q. So I recognize that you are wearing a mask and
14 behind Plexiglas. There's a microphone in front of you, if
15 you could just make an effort to speak into the mic and keep
16 your voice up that would be great.

17 A. No problem.

18 Q. Where do you currently work?

19 A. The Federal Bureau of Investigation.

20 Q. What is your title?

21 A. Special agent.

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

23 A. About three years, three years now.

24 Q. Where are you currently assigned?

25 A. I work for the -- on the Violent Crimes against

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1 Children squad.

2 Q. What are your duties and responsibilities as a
3 special agent on that squad?

4 A. We investigate crimes that have to do with child
5 sexual abuse material, sextortion, exploitation, and
6 enticement of minors, sex trafficking.

7 GRAND JUROR. Maybe if she could take the mask
8 off. I'm having -- is anybody having difficulty
9 understanding her?

10 MS. [REDACTED] Thanks for letting me know. Would that
11 be okay with you if the witness took her mask off?

12 GRAND JUROR. We're okay with the Plexiglas,
13 right?

14 GRAND JUROR. Yeah.

15 MS. [REDACTED]. Thanks very much. Thank you.

16 BY MS. [REDACTED]:

17 Q. All right. So I'm just going to go back and ask
18 a few of those questions again just to make sure that
19 everyone can hear. You testified earlier that you're a
20 special agent with the FBI. Is that correct?

21 A. Yes.

22 Q. Where are you currently assigned?

23 A. I work on the Violent Crimes against Children
24 squad.

25 Q. And what are your duties and responsibilities as a

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1 special agent on that squad?

2 A. We investigate crimes that involve child sexual
3 abuse material, sextortion, enticement, and exploitation of
4 minors, sex trafficking, international parental kidnappings.

5 MS. [REDACTED]. Let me just pause here. Can everyone
6 hear the witness?

7 GRAND JUROR. Yes.

8 MS. [REDACTED] Okay. Thank you. And Special Agent
9 [REDACTED], if you could just try to keep your voice up, I really
10 appreciate it. It's a little difficult under the
11 circumstances.

12 BY MS. [REDACTED]:

13 Q. Have you participated in an investigation of
14 Ghislaine Maxwell?

15 A. Yes, I have.

16 Q. Have you spoken to other people, including other
17 law enforcement officers, about this investigation?

18 A. Yes.

19 Q. Have you reviewed reports and documents prepared
20 by others regarding this case?

21 A. Yes.

22 Q. Is your testimony today based in part on those
23 conversations with other law enforcement officers and
24 documents that you have reviewed?

25 A. Yes.

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1 MS. [REDACTED]. Ladies and gentlemen, let me just give
2 you a brief instruction. Some of the testimony that you'll
3 hear today will include what's called hearsay. As you know,
4 that means that the witness will not be testifying solely
5 from her own observations, but that she'll also be reporting
6 to you what others have told her and what she's read in
7 reports and documents prepared by other people.

8 Hearsay evidence is admissible in these grand jury
9 proceedings, and you're free to rely on it in determining
10 whether there's probable cause to indict the proposed
11 defendant.

12 If, however, you would like to hear the testimony
13 of any other witness, you have the right to request it and
14 we will make reasonable efforts to bring that witness before
15 you.

16 BY MS. [REDACTED]:

17 Q. Special Agent [REDACTED], we placed on the desk in
18 front of you a PowerPoint that is Grand Jury Exhibit 2,
19 which we're entering into the record. Do you recognize
20 this?

21 A. Yes.

22 Q. What is it?

23 A. It's a PowerPoint presentation to assist in
24 testifying today.

25 Q. Did you participate in preparing this exhibit in

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1 connection with your testimony today?

2 A. Yes, I did.

3 Q. If you could please turn to the first slide. Who
4 are the individuals depicted in these photographs?

5 A. The picture on the left is Ghislaine Maxwell, and
6 the picture on the right is Jeffrey Epstein with
7 Ghislaine Maxwell.

8 Q. Based on your participation in this investigation
9 and your review of public source materials, have Maxwell and
10 Epstein been photographed together many times over the
11 years?

12 A. Yes.

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

15 A. Maxwell was born in France. She grew up in the
16 United Kingdom, was educated in Oxford, and is from a
17 wealthy family.

18 Q. Is she a citizen of France, the United Kingdom,
19 and the United States?

20 A. Yes.

21 Q. How old is she currently?

22 A. 58.

23 Q. Has the FBI investigated Maxwell and Epstein's
24 conduct with minors during the 1990's?

25 A. Yes

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1 Q. Generally speaking, what have you learned about
2 the relationship between Maxwell and Epstein during the
3 1990's?

4 A. Epstein and Maxwell had a romantic relationship,
5 and she also worked for him; managing his homes, hiring and
6 firing individuals.

7 Q. During that time period, was she one of his
8 closest associates?

9 A. Yes.

10 Q. During the course of this investigation, have you
11 learned where Epstein maintained properties in the 1990's?

12 A. Yes.

13 Q. Where did he maintain properties?

14 A. New York, Palm Beach, and New Mexico.

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

17 A. Yes.

18 Q. Does this slide fairly and accurately depict the
19 residence?

20 A. Yes.

21 Q. Can you please describe that property for the
22 grand jury?

23 A. It's a seven story home; it's located near Central
24 Park. It's reportedly the largest residence in Manhattan.

25 Q. Based on your participation in this investigation,

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1 did that house include a room that was used a massage room?

2 A. Yes, it did.

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

7 A. Yes.

8 Q. Turning to the next slide. Does this slide fairly
9 and accurately depict that residence?

10 A. Yes, it does.

11 Q. Could you please describe that property for the
12 grand jury?

13 A. It's a waterfront estate. It has an in ground
14 pool and a detached dwelling or pool house on the property
15 as well.

16 Q. And from your participation in this investigation
17 and your review of other materials, did that house include a
18 room that was used as a massage room?

19 A. Yes.

20 Q. Turning to the next property. Did Epstein also
21 own a ranch in New Mexico?

22 A. Yes, he did.

23 Q. And turning to the next slide. Was that property
24 located at 49 Zorro Ranch Road in Stanley, New Mexico?

25 A. Yes.

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1 Q. Looking at the photograph on this slide, does this
2 accurately depict that property?

3 A. Yes, it does.

4 Q. And we've been talking about the properties that
5 Epstein owned during this time period. Did he also own a
6 private jet?

7 A. Yes.

8 Q. Is it fair to say that he was a multimillionaire
9 during this time period?

10 A. Yes.

11 Q. During the 1990's did Epstein have an employee
12 [REDACTED] who ran his house in Palm Beach?

13 A. Yes, he did.

14 Q. What was his job?

15 A. His job was making sure that everything in the
16 house ran smoothly. He referred -- he described that
17 Epstein liked to have his house run like a five-star hotel;
18 that everything had to be in its proper place. So he was
19 responsible for managing that.

20 Q. Have you interviewed [REDACTED]?

21 A. Yes.

22 Q. How many times?

23 A. Twice.

24 Q. And is the information you're about to provide
25 based on your interviews with [REDACTED]?

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1 A. Yes.

2 Q. Did [REDACTED] begin working for Epstein in the early 3
1990's?

4 A. Yes, he did.

5 Q. And at the time [REDACTED] came to work for Epstein in
6 Palm Beach, was Epstein dating Ghislaine Maxwell at that
7 point?

8 A. Not at that time.

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

11 A. Yes.

12 Q. From what [REDACTED] told you, how did [REDACTED]'s
13 work change once Maxwell arrived on the scene?

14 A. [REDACTED] described Epstein as being more pleasant to
15 work with prior to Maxwell coming into the picture. Once
16 she came into the picture, he said things became more
17 secretive. He wasn't allowed to be in the room with guests,
18 wasn't allowed to talk with them, associate with them. It
19 became a different environment.

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

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

25 Q. In general, how did he describe what it was like

1 to work for Maxwell?

2 A. He said she was very demanding; she was on top of
3 him all the time. He described her as a "bitch."

4 Q. Is that the word that he used?

5 A. That is the word he used.

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

11 A. Yes.

12 Q. So for these purposes I'm just going to refer to
13 her as [REDACTED] Is that okay?

14 A. Yes.

15 Q. How many times have you interviewed [REDACTED]

16 A. Approximately five times.

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

19 A. Yes.

20 Q. Is it your understanding that these photographs
21 depict [REDACTED] from approximately ages 13 to approximately 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] date of birth [REDACTED] [REDACTED]?

1 A. Yes.

2 Q. And 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] [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?

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] father do before he passed away?
18 What was his profession?

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

20 [REDACTED].

21 Q. Was [REDACTED] involved in the [REDACTED]

22 A. Yes, she was.

23 Q. Were her siblings?

24 A. Yes.

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

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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 is in

7 [REDACTED], so did she turn 14 in [REDACTED] of 1994?

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, they found out that she was also from Palm

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1 Beach and that he said that he gives scholarships to
2 students.

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

5 A. They asked for [REDACTED] phone number.

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

9 A. Yes.

10 Q. If you could turn to the next slide, please. Have
11 you obtained records from Interlochen for the summer of
12 1994?

13 A. Yes.

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

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

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

21 A. Yes.

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

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

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1 school.

2 Q. Did he make any substantial donations?

3 A. He did.

4 Q. Did he donate a lodge to the camp in the summer of 5
1994?

6 A. Yes, he did.

7 Q. Did he have a long standing relationship as a
8 donor to Interlochen?

9 A. Yes.

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

12 A. Yes, it is.

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

15 A. Yes.

16 Q. Does it invite Epstein to visit in August of 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 that the plane flew into and
24 out 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've 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 TVC?

7 A. Yes.

8 Q. Is TVC the airport code for Cherry Capital Airport
9 in Traverse City, Michigan?

10 A. Yes, it is.

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

13 A. It's about 25 minutes give or take.

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

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

17 Q. Turning to the next slide. Is this the same
18 excerpt but just with a different arrow?

19 A. Yes.

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

22 A. Yes.

23 Q. And do the passengers listed in the flight out of
24 Traverse City include the initials G.M.?

25 A. Yes, they do.

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1 Q. Are those Ghislaine Maxwell's initials?

2 A. Yes.

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

5 A. Yes.

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

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

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

18 A. Yes.

19 Q. When was the next time that happened?

20 A. Shortly thereafter.

21 Q. And how did that occur?

22 A. She was invited to his house. So her and her
23 mother went to Epstein's house to visit.

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

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

2 Q. Of course. Did [REDACTED] go to the house by herself
3 or with her mother?

4 A. With her mother.

5 Q. Okay. And when they went to the house, what did
6 they do there?

7 A. They had tea.

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

9 A. Epstein and Maxwell.

10 Q. What did they discuss as they had tea?

11 A. They just talked about her life and, you know,
12 what she wanted to do.

13 Q. Did Epstein make any offers?

14 A. He said that he gives scholarships. He likes to
15 mentor people.

16 Q. How did [REDACTED] mother react when Epstein said
17 this?

18 A. She was happy for her daughter and oftentimes
19 referred to Epstein as [REDACTED] Godfather.

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

24 A. Yes.

25 Q. And did that start when she was approximately age

1 14?

2 A. Yes.

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

4 A. Yes, it did.

5 Q. And during those years, did she regularly go over

6 to Epstein's house in Palm Beach and spend time with Maxwell
7 and Epstein?

8 A. Yes.

9 Q. What happened in the summer of 1997 when [REDACTED]
10 was 17 and about to turn 18?

11 A. She moved to New York City.

12 Q. Why did she move to New York City?

13 A. She wanted to pursue a career in acting and
14 modeling.

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

22 A. They'd hang out by the pool, he -- they would take
23 her to the movies, take her shopping. She described the
24 behavior as grooming.

25 Q. When you say grooming, did she explain what she

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1 meant by that?

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

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

10 A. Yes.

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

14 A. Something she's described now. She didn't realize
15 that at the time.

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

20 A. Yes.

21 Q. Generally speaking, -- you were touching on this a
22 moment ago, but if you just could explain in full. What is
23 grooming?

24 A. Grooming is when someone builds a relationship
25 with a child. They find a vulnerability or a need and then

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1 they work on gaining a child's trust, and then oftentimes
2 gaining a parent's trust. Once they have that trust, they
3 show that in ways that they care about them by giving them
4 gifts and promises. And then once that's established, they
5 then turn the relationship sexual, oftentimes making sexual
6 comments and normalizing the behavior.

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

10 A. Yes, she did.

11 Q. What did he give her?

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

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

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

22 Q. You used the phrase cool older sister. Is that a
23 phrase that [REDACTED] used to describe how she felt about
24 Maxwell at the time and what Maxwell was like?

25 A. Yes, those are her words.

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

3 A. Yes.

4 Q. What did she tell you about that?

5 A. She was a little taken back, but Maxwell just
6 acted normal.

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

10 A. Yes.

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

13 A. He did.

14 Q. What did she say?

15 A. She said she wanted to be an actress and a model.

16 Q. How did Epstein respond?

17 A. He told her that he was best friends with the
18 owner of Victoria Secret. Told her that she would have to
19 have photographs taken and that she got to be comfortable in
20 her underwear, and not to be a prude. When she asked what
21 that meant, he pulled her to his lap and masturbated.

22 Q. What was her reaction?

23 A. She felt paralyzed. She froze.

24 Q. After this incident, did [REDACTED] encounters with
25 Epstein begin to include sexual contact?

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1 A. Yes.

2 Q. Over time, did the sexual abuse escalate?

3 A. It did.

4 Q. From what she's described to you, did the abuse

5 include Epstein digitally penetrating [REDACTED]

6 A. Yes.

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

8 A. Yes.

9 Q. Did she describe to you that there were times when

10 Epstein would direct [REDACTED] to massage him while he

11 masturbated?

12 A. Yes.

13 Q. Did [REDACTED] explain to you what her memories are

14 like of the abuse?

15 A. Yes.

16 Q. What did she say about that?

17 A. She said that it happened so often that it all

18 kinds -- it all runs together for her. That it's hard to

19 separate out some of the different instances of abuse.

20 Q. You were describing how [REDACTED] explained to you

21 that the abuse began. Did that occur based on what [REDACTED]

22 told you within the first year that she met Epstein and

23 Maxwell?

24 A. Yes.

25 Q. Now, did [REDACTED] also describe to you that once this

1 abuse started, Epstein would also bring her into his massage
2 room in the house?

3 A. Yes.

4 Q. And were there times where he did this where there
5 are other women present including Maxwell?

6 A. Yes.

7 Q. Was [REDACTED] abused during those episodes?

8 A. Yes, she was.

9 Q. During these group encounters what were [REDACTED] and
10 the adult women wearing?

11 A. They were usually just in their underwear.

12 Q. Once they were all in the massage room, how would
13 these episodes generally start?

14 A. They would generally start with one of the girls
15 massaging Epstein. [REDACTED] was usually massaging his feet.
16 Maxwell was kind of teasing the girls; she'd grab the girls'
17 breasts and she would direct the girls on what to do.

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

20 A. Yes.

21 Q. What would happen as things progressed generally
22 speaking from what she described to you?

23 A. When Epstein would decide he was kind of done with
24 the regular massage, he would turn over to his back and he'd
25 grab whichever girl he wanted to either touch him or

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1 whatever girl he wanted to touch.

2 Q. Did these episodes include sex acts that over time
3 in various instances included Epstein masturbating, Epstein
4 receiving oral sex, and Epstein engaging in intercourse?

5 A. Yes.

6 Q. You were describing for a moment what [REDACTED] told
7 you about Maxwell's role during these group encounters.
8 Would Maxwell sometimes guide the women and give
9 instructions about what to do?

10 A. Yes, she would.

11 Q. What would [REDACTED] typically do during these
12 episodes?

13 A. She would try to not look at Maxwell because she
14 gave off that sister vibe so it felt weird for her. She
15 would try to be invisible in that room so they would ignore
16 her as much as possible.

17 Q. In the beginning when [REDACTED] was approximately 14
18 or 15, would she generally begin by just massaging Epstein's
19 feet?

20 A. Yes.

21 Q. Is that something she was told to do?

22 A. Yes.

23 Q. Did she -- you mentioned that she tried to be
24 invisible. Was -- I believe that was your testimony?

25 A. Yes.

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1 Q. And over time -- has she described to you that
2 over time she believes she became more involved in the
3 sexual activity which varied in each encounter?

4 A. Yes.

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

9 A. It was very casual. She acted like this was
10 normal. She gave off that vibe to her and -- yeah.

11 Q. Did that make her feel more comfortable with what
12 was happening?

13 A. It did.

14 Q. Was [REDACTED] sometimes fully nude during these
15 episodes?

16 A. Yes.

17 Q. And during these episodes, did the abuse include
18 Epstein touching [REDACTED] s breast?

19 A. Yes.

20 Q. Did it include directing [REDACTED] to touch Epstein's
21 genitals?

22 A. Yes.

23 Q. Beginning when [REDACTED] was approximately 14, does
24 she begin to travel with Epstein and Maxwell to New York
25 City on occasion?

1 A. Yes, she did.

2 Q. Was that to the property you testified about
3 earlier? The townhouse on the Upper East Side?

4 A. Yes.

5 Q. When [REDACTED] traveled to New York City, did she stay
6 at Epstein's townhouse in New York City?

7 A. Yes, she did.

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

10 A. Yes.

11 Q. Did she remember them buying her anything?

12 A. She recalled them buying her white cotton
13 underwear. Her description was that they were, like, little
14 girls underwear.

15 Q. From ages 14 to 17, did Epstein ask [REDACTED] to
16 periodically fly to New York for weekends at that townhouse
17 in New York?

18 A. I'm sorry, say it again?

19 Q. You testified that she began traveling to New York
20 City at age 14. Did she then periodically travel to New
21 York City in a similar manner from ages 14 to 17?

22 A. Yes.

23 Q. Were there times when she traveled on those trips
24 when she flew on Epstein's private jet?

25 A. Yes.

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1 Q. Did she also sometimes fly commercially?

2 A. Yes, she did.

3 Q. Was Maxwell sometimes present on the trips to New
4 York?

5 A. Yes.

6 Q. You testified earlier that [REDACTED] was sexually
7 abused in Palm Beach. Did she describe to you that she was
8 also sexually abused on these trips to New York?

9 A. Yes, she did.

10 Q. Did Maxwell encourage [REDACTED] to go on these trips?

11 A. Yes.

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

14 A. She recalled that Maxwell was usually the one that
15 would schedule her flights. If she was flying commercially,
16 she would schedule the flights, sometimes calling her mother
17 to schedule.

18 Q. Was that her general impression of how they were
19 arranged?

20 A. Yes.

21 Q. In addition to the trips to New York City that you
22 just described, did [REDACTED] also remember traveling at least
23 once to Epstein's ranch in New Mexico?

24 A. Yes, she did.

25 Q. Did she remember whether or not she was sexually

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1 abused in New Mexico?

2 A. She couldn't recall. She couldn't remember.

3 Q. In general, how would [REDACTED] get to the airport in
4 Florida when she would fly on Epstein's jet? What did she
5 describe to you?

6 A. Usually a driver -- one of Epstein's drivers would
7 pick her up from her house and take her to the airport.

8 Q. Now, you testified earlier that you reviewed
9 flight records for Epstein's private jet. Is that correct?

10 A. Yes.

11 Q. And have you reviewed records from the 1990's to
12 see if that there -- whether there's a person named [REDACTED]
13 listed on the records?

14 A. Yes.

15 Q. Turning to the next slide. Is this an excerpt
16 from those records?

17 A. Yes, it is.

18 Q. And does the red arrow point to -- just one
19 moment. Does the red arrow point to a November 11th, 1996
20 flight?

21 A. Yes, it does.

22 Q. And is this a -- does this flight log reflect that
23 it was a flight from Palm Beach, Florida to Teterboro, New
24 Jersey?

25 A. Yes.

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1 Q. Is there a private airfield in Teterboro, New
2 Jersey?

3 A. Yes, there is.

4 Q. What's it called?

5 A. Teterboro Airport.

6 Q. Are the passengers listed on this entry J.E.?

7 A. Yes.

8 Q. Are the -- do the entries also include [REDACTED] plus
9 friend, Jeff Schantz (ph.), family, [REDACTED] (ph.) child, [REDACTED]
10 (ph.), and [REDACTED]

11 A. Yes.

12 Q. Was [REDACTED] -- based on your awareness of [REDACTED]
13 date of birth and the date of this flight, was [REDACTED] 16 on
14 the date of this flight?

15 A. Yes, she was.

16 Q. Turning to the next slide. You testified earlier
17 about Teterboro Airport. What are we looking at on this
18 slide?

19 A. This is directions from Teterboro Airport to
20 Epstein's residence here in Manhattan.

21 Q. So based on your review of this map, if someone
22 were to fly into Teterboro Airport and travel to New York
23 City, would they -- would the most natural route be to travel
24 from Teterboro Airport and crossing into New York through
25 Manhattan?

1 A. Yes.

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

4 A. Yes, it is.

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

7 A. Yes, it does.

8 Q. And are the passengers listed on this log J.E.,
9 G.M., [REDACTED]

10 A. Yes.

11 Q. Based on your knowledge of [REDACTED] birthdate and
12 the date of this flight, would [REDACTED] have been 16 on the
13 date of this flight?

14 A. Yes, she would've been.

15 Q. Turning to the next slide. Is this also an
16 excerpt from the flight records?

17 A. Yes.

18 Q. And does the red arrow point to a flight entry on 19
May 3rd, 1998?

20 A. Yes, it does.

21 Q. Based on the airport codes, does this reflect that
22 there is a flight on that date from Palm Beach, Florida to
23 Teterboro, New Jersey?

24 A. Yes.

25 Q. And are the passengers listed on this log J.E.,

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1 G.M., E.T., [REDACTED], Glen (ph.), [REDACTED], [REDACTED] (ph.), [REDACTED]
2 (ph.), [REDACTED] (ph.), [REDACTED] (ph.)?

3 A. Yes.

4 Q. Based on your knowledge of [REDACTED] birthdate and
5 the date of this flight, would [REDACTED] have been 17 on this
6 date?

7 A. Yes.

8 Q. Am I correct that you testified earlier that in
9 addition to sometimes flying on Epstein's private jet, she
10 also traveled on commercial airlines, is that correct?

11 A. Yes, it is.

12 Q. Based on your review of these flight logs, does
13 every flight entry list the name of every single passenger,
14 or are there times when a passenger is noted female?

15 A. There's time where a passenger is just noted
16 female.

17 Q. I'm going to talk to you about two examples of
18 that. Turning ahead two slides. Looking at slide 18, does
19 this reflect a January 3rd, 1995 flight where the flight log
20 says J.E., two females?

21 A. Yes, it does.

22 Q. And do the two entries below also just list female
23 next to the initials J.E.?

24 A. Yes, they do.

25 Q. Turning to the next slide, slide 19. Is this

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1 another example of an entry like that? Focusing on the
2 entry on February 12th, 1995?

3 A. Yes.

4 Q. Does that entry also say female?

5 A. Yes, it does.

6 Q. Now, you testified that [REDACTED] sometimes flew on
7 commercial airlines and that arrangements for her travel
8 were made for her to fly commercially for these trips. Is
9 that right?

10 A. Yes.

11 Q. Have you been able to obtain commercial flight
12 records?

13 A. We tried. We were not able to obtain those
14 records.

15 Q. Why is that?

16 A. Airlines do not keep records past a certain year.

17 Q. Does [REDACTED] recall group sexualized massages
18 involving Epstein and Maxwell in both the New York and
19 Florida residences during the time period we've been talking
20 about?

21 A. Yes.

22 Q. You testified earlier about the time that Epstein
23 and Maxwell would spend together and the activities that
24 they were involved in. During this time period, did [REDACTED]
25 have occasions to talk with Maxwell?

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

2 Q. During the -- beginning when she was 14 when she
3 began spending time with Epstein and Maxwell and through the
4 years, did [REDACTED] often have conversations with Maxwell about
5 her life?

6 A. Yes.

7 Q. Did they talk about that often?

8 A. They did.

9 Q. Did Maxwell ask [REDACTED] about her family, her
10 classes, and other aspects of her life?

11 A. Yes, she did.

12 Q. You testified earlier that just before she turned
13 18, [REDACTED] moved to New York City. Is that right?

14 A. Yes.

15 Q. Did she go to school there in New York City for
16 her senior year?

17 A. Yes, she did.

18 Q. What school did she go to?

19 A. She went to [REDACTED].

20 Q. What is [REDACTED]?

21 A. They cater to individuals who want to pursue
22 careers in the arts.

23 Q. Have you reviewed records from [REDACTED]

24 [REDACTED]?

25 A. Yes.

1 Q. If you could turn to slide 17. Can you please
2 explain for the grand jury what we're looking at here?

3 A. This is an excerpt from [REDACTED] application to [REDACTED]
4 [REDACTED]. On it is listed who is
5 financially responsible for her, and that is
6 Jeffrey Epstein.

7 Q. From what [REDACTED] told you, did Maxwell encourage
8 [REDACTED] to accept Epstein's financial help?

9 A. Yes.

10 Q. When [REDACTED] moved to New York City who was she
11 living with?

12 A. She lived with her mother and brother in [REDACTED]
13 [REDACTED] apartment.

14 Q. Did Epstein help pay for her rent?

15 A. He did.

16 Q. During that year, her senior year of high school
17 when she was in New York City, did [REDACTED] remain in contact
18 with Epstein?

19 A. Yes.

20 Q. What was the nature of their contact like during
21 this time period?

22 A. During this time he was still sexually abusing
23 her.

24 Q. Did that continue to occur in his townhouse in
25 Manhattan that year?

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1 A. Yes, it did.

2 Q. What happened at the end of her senior year of
3 high school?

4 A. She moved to Los Angeles to pursue a career in
5 acting.

6 Q. Did she get a job as an actress when she was 18?

7 A. She did.

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

10 A. Yes.

11 Q. After she moved to Los Angeles did she continue
12 being in touch with Epstein?

13 A. For a short period of time.

14 Q. Did she ultimately break contact with him?

15 A. Yes, she did.

16 Q. Is [REDACTED] currently pursuing a civil lawsuit
17 against Maxwell and Epstein's estate?

18 A. Yes.

19 Q. Have you talked with [REDACTED] about whether when she
20 was a teenage girl when all of this was happening whether
21 she told anyone that she was being sexually abused?

22 A. Yes, she said she didn't tell anyone. She felt
23 like she couldn't. She -- the -- nothing was talked about
24 outside of that room, so it made it so that she couldn't
25 talk about it. And then she also -- her mother is Middle

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1 Eastern, and her mother raised her that women are supposed
2 to do what they're told even if someone is beating you.

3 And when she was 13 and her father passed, she was
4 -- she went to a guidance counselor at school to talk about
5 it, and her mother found out about it and smacked her. So
6 she felt like she couldn't talk to anyone about it.

7 Q. Did [REDACTED]'s mother encourage her to accept
8 Epstein's financial assistance?

9 A. Yes, she did.

10 Q. Have you become aware that in 2005, police
11 officers from the Palm Beach Police Department executed a
12 search warrant at Epstein's house at the El Brillo Way
13 address in Palm Beach?

14 A. Yes.

15 Q. Have you reviewed some of the materials seized
16 during the search?

17 A. Yes.

18 Q. Did they find massage tables and sex toys?

19 A. Yes, they did.

20 Q. Did they find any photographs of [REDACTED] [REDACTED]

21 A. Yes.

22 Q. Was one of the photographs signed by [REDACTED]

23 A. Yes, it was.

24 Q. Did it say [REDACTED] [REDACTED]

25 [REDACTED] ?

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1 A. Yes.

2 Q. During your interviews with [REDACTED] did [REDACTED] tell
3 you how she felt about Epstein and Maxwell in the '90's when
4 she was a young girl?

5 A. She did. She expressed that she felt like they
6 loved her, she felt like they were her family. That they
7 supported her and that she felt she was made to feel like
8 that she needed to be grateful to them.

9 Q. Okay. Did she tell you that she felt like they
10 were trying to help her?

11 A. Yes.

12 Q. Have you talked with [REDACTED] about how she feels
13 about this now?

14 A. Yes.

15 Q. What was [REDACTED] demeanor like when she described
16 to you what Epstein and Maxwell had done to her?

17 A. She was upset. She recognized that now, it's
18 affected her life to a great degree. She's struggled in
19 relationships with opening up to people and trusting people,
20 both personal and professional relationships.

21 Q. Did she tell you that she struggled to tell anyone
22 what had happened to her for most of her adulthood?

23 A. Yes.

24 Q. When was the first time that you interviewed
25 [REDACTED]

1 A. Last fall.

2 Q. Was that the first time she'd ever reported this
3 to law enforcement?

4 A. Yes, it was.

5 Q. Now, you testified earlier about your interviews
6 with [REDACTED] who worked at Epstein's Palm Beach house.
7 Did he remember a girl named [REDACTED] coming to the house
8 during that time?

9 A. Yes, he did.

10 Q. Did he recall [REDACTED], Maxwell, and Epstein being in
11 the Palm Beach house together?

12 A. Yes.

13 Q. What was his understanding of why [REDACTED] was there?

14 A. He thought that Epstein was helping her, that's
15 what Epstein had told him, and [REDACTED] had told him that
16 Epstein was helping her.

17 Q. Did he ever observe Epstein interacting with [REDACTED]
18 physically?

19 A. Yes.

20 Q. What did he see?

21 A. He saw Epstein kiss [REDACTED] cheek and pat her on
22 the bottom.

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

25 A. He didn't.

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1 Q. Did [REDACTED] ever recall picking up [REDACTED] from her
2 house?

3 A. Yes.

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

6 A. Yes.

7 Q. Did he remember who in general would tell him to
8 pick up [REDACTED] from her house?

9 A. Maxwell would be the one to tell him to pick her
10 up.

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

12 A. Yes.

13 Q. What did he tell you about that?

14 A. That it would usually be Epstein, Maxwell, and
15 [REDACTED] They'd go to the movies and it would usually be late
16 at night.

17 Q. Did he tell you about what his memory was about
18 how old [REDACTED] was?

19 A. He said she was young and that he knew that
20 because he had picked her up from school and that he knew
21 she was too young to drive.

22 Q. Switching gears. I want to talk to you about a
23 different aspect of your interviews with [REDACTED]. Based
24 on what he told you about his job duties, were there ever
25 times when he would have to clean Epstein's massage room?

1 A. Yes.

2 Q. What did he tell you about that?

3 A. He said that he found sex toys in the massage room
4 and he had to wash them afterwards.

5 Q. Aside from those experiences, was he aware of
6 there being sex toys in the house?

7 A. Yes. There was a basket of sex toys that were
8 kept in Maxwell's closet.

9 Q. Did [REDACTED] stop working for Epstein in
10 approximately 2002?

11 A. Yes.

12 Q. Was he told that he was being replaced?

13 A. Yes.

14 Q. And was he generally aware that the person who
15 replaced him was much younger?

16 A. Yes.

17 Q. Did [REDACTED] tell you that a few months after he
18 left working for Epstein he became suicidal because of
19 issues in his marriage?

20 A. Yes.

21 Q. Did he tell you that he went to Epstein's house
22 and tried to take Epstein's gun?

23 A. Yes, he did.

24 Q. Did he tell you he took several thousand dollars?

25 A. Yes.

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1 Q. Did Epstein discover this and confront him about
2 it?

3 A. Yes, he did.

4 Q. Did [REDACTED] admit to Epstein and the police what
5 he'd done?

6 A. Yes.

7 Q. Did Epstein also tell the police his gun was
8 missing?

9 A. Yes.

10 Q. Were there any charges filed?

11 A. No.

12 Q. Was he ever arrested?

13 A. I don't believe so.

14 Q. And did Epstein pursue any charges about this
15 incident?

16 A. No, he didn't pursue anything.

17 Q. Have you interviewed one of Epstein's former
18 pilots?

19 A. Yes.

20 Q. Is that pilot named [REDACTED] [REDACTED]?

21 A. Yes.

22 Q. Was he one of the pilots for Epstein's private jet
23 in the 1990's?

24 A. Yes.

25 Q. Did he remember [REDACTED] [REDACTED] traveling on the je

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1 in the 90's?

2 A. He remembered her traveling, but he didn't
3 remember specifics.

4 Q. So just to be clear, is your testimony that he
5 didn't remember the specific dates of the flights, but he
6 remembered her traveling on the jet during the 1990's?

7 A. Yes.

8 Q. And did he remember [REDACTED] [REDACTED] specifically as
9 a person who traveled?

10 A. Yes.

11 Q. Did you discuss with him the flight records that
12 we talked about earlier that lists a person named [REDACTED] as a
13 passenger?

14 A. Yes.

15 Q. Did he have a specific memory of those exact
16 flights?

17 A. No.

18 Q. But was he aware of any other [REDACTED] flying on the
19 jet besides [REDACTED] [REDACTED] in the 1990's?

20 A. No, no other [REDACTED] at that time.

21 Q. Earlier when we were looking at Interlochen
22 attendance records for the summer of 1994, you noted that
23 [REDACTED] [REDACTED] was one of the names on that record. Is that
24 right?

25 A. Yes.

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1 Q. Is that [REDACTED] [REDACTED]?

2 A. Yes.

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

4 A. Yes, I have.

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

7 A. Yes.

8 Q. Did he tell you that he remembered [REDACTED] going
9 over to Epstein's house in Palm Beach when they were in high
10 school?

11 A. Yes.

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

14 A. Yes.

15 Q. Did he remember [REDACTED] telling him when they were
16 in high school about at least one trip to New York City that
17 she took with Epstein?

18 A. Yes.

19 Q. Did he remember [REDACTED] describing Epstein's
20 townhouse in Manhattan?

21 A. Yes.

22 Q. And does he remember [REDACTED] talking often about
23 Ghislaine Maxwell?

24 A. Yes.

25 Q. Now, based on your interviews with [REDACTED] did he

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1 tell you whether he knew back then when they were in high
2 school whether [REDACTED] was being sexually abused by Epstein?

3 A. He didn't know back then.

4 Q. Did [REDACTED] ever meet Ghislaine Maxwell?

5 A. Yes, he did.

6 Q. What did he remember about that?

7 A. He remembered Epstein, Maxwell, and [REDACTED] being
8 near a movie theatre and he was approximately 16 at the time
9 and [REDACTED] would've been 15, and just the little bit of
10 interaction they had. And then after that, [REDACTED] had told
11 him that Maxwell had said something to the effect I could
12 teach [REDACTED] a thing or two.

13 Q. Is that something that he remembers [REDACTED] telling
14 him back then that Maxwell had said?

15 A. Yes.

16 Q. During the course of this investigation, have you
17 participated with interviews with an individual named

18 [REDACTED] [REDACTED]

19 A. Yes.

20 Q. So for today's purposes I'm just going to refer to
21 her as [REDACTED]. How many times have you interviewed [REDACTED]

22 A. Approximately twice.

23 Q. Now, does [REDACTED] know [REDACTED] [REDACTED] Have they
24 ever met as far as you know?

25 A. As far as I know, no.

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

3 A. Yes.

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

5 A. Yes.

6 Q. When [REDACTED] was approximately 16 and a junior in
7 high school, where was she living?

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

9 Q. Does she have any siblings?

10 A. An older sister.

11 Q. What did her older sister do?

12 A. Her older sister lived -- worked for Epstein.

13 Q. Where did she work for Epstein?

14 A. Here in New York.

15 Q. Did there come a time in approximately December
16 1995 when [REDACTED] had a phone conversation with her sister
17 about traveling to New York City?

18 A. Yes.

19 Q. What did they discuss?

20 A. They discussed her coming to New York and meeting
21 Epstein.

22 Q. What did her sister tell [REDACTED] about why she
23 should meet Epstein?

24 A. She said that he could help her with college.

25 Q. And did she say -- did the sister say whether the

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1 sister wanted her to meet Epstein or did she say whether
2 Epstein wanted to meet [REDACTED]

3 A. Epstein wanted to meet [REDACTED]

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

8 A. Yes.

9 Q. So is this approximately the same time period
10 while what you described [REDACTED] telling you happened?

11 A. Yes.

12 Q. So in January of 1996, did [REDACTED] fly on a
13 commercial airline to New York City to spend a weekend with
14 her sister and meet Jeffrey Epstein?

15 A. Yes.

16 Q. Did she tell you that?

17 A. Yes.

18 Q. During the trip, did [REDACTED] tell you that she met
19 Epstein at his townhouse in New York City?

20 A. Yes, she did.

21 Q. Did she tell you that Epstein discussed her plans
22 for college applications and offered to help her?

23 A. Yes.

24 Q. What was [REDACTED] first impression of
25 Jeffrey Epstein?

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1 A. She was very impressed by him.

2 Q. What did she -- what was her impression based on
3 this conversation of what Epstein was going to do for her?

4 A. That he was going to help her with her future
5 plans for college.

6 Q. During that trip to New York City, did she stay at
7 Epstein's townhouse or at her sister's apartment?

8 A. Her sister's apartment.

9 Q. During that trip, did she tell you that she saw
10 Epstein a second time when he took [REDACTED] and her sister to
11 the movies?

12 A. Yes.

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

14 A. She said that they were sitting in the theatre and
15 Epstein was between [REDACTED] and her sister, and Epstein put
16 his hand on her leg, he rubbed her arm and held hands with
17 her.

18 Q. From what she told you what was her impression
19 about whether her sister could see what was going on?

20 A. She felt like her sister couldn't see.

21 Q. What was her reaction to this happening?

22 A. She was uncomfortable.

23 Q. After the movie did she tell her sister what had
24 happened?

25 A. No, she didn't.

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1 Q. Did she say why not?

2 A. She said that she knew [REDACTED] -- her sister really
3 liked Epstein and that Epstein could help them, so she
4 didn't tell her.

5 Q. After this trip did [REDACTED] go back home to [REDACTED]?

6 A. Yes.

7 Q. Did Epstein contact her afterwards?

8 A. Yes.

9 Q. Did he discuss with her her ongoing college plans?

10 A. Yes, he did.

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

13 A. Yes.

14 Q. Was she 16 at the time?

15 A. Yes, she was.

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

18 A. She knew Maxwell would be there.

19 Q. Did she -- was she told anyone else was going to
20 be present during this trip?

21 A. She said that there would be, like, other students
22 her -- kids her age.

23 Q. And what was her understanding of who these other
24 kids were and why they'd be there? Sorry, let me --

25 A. Rephrase.

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1 Q. -- rephrase the questions. You testified that she
2 was told that on this trip that there would be other
3 students. Was she under the impression that there would be
4 other young students like her on the trip who were also
5 being mentored by Epstein?

6 A. Yes.

7 Q. Now, you testified just a moment ago that she was
8 also told that Maxwell would be there. Are you referring to
9 Ghislaine Maxwell?

10 A. Yes.

11 Q. At the point that she was told that
12 Ghislaine Maxwell would be on this trip, had she ever met
13 Ghislaine Maxwell?

14 A. No, she hadn't.

15 Q. Had she heard her sister talk about
16 Ghislaine Maxwell?

17 A. Yes.

18 Q. How did -- from what she described to you, how did
19 her expectation that Maxwell would be on this trip make her
20 feel about the trip?

21 A. It made her comfortable. Her sister had talked
22 highly of Maxwell.

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

25 A. Yes.

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1 Q. Did she meet Ghislaine Maxwell when she arrived in
2 New Mexico?

3 A. Yes, she did.

4 Q. How did she describe Maxwell's demeanor and
5 attitude when she met her?

6 A. She described Maxwell as being very charming. She
7 gave her a tour of the house and Maxwell took [REDACTED]
8 shopping, which made her feel special.

9 Q. What does she remember talking about with
10 Ghislaine Maxwell?

11 A. They talked about school, homework, trips.

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

13 A. Yes.

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

15 A. Yes.

16 Q. Did she talk with her about the homework that she
17 had to do that weekend?

18 A. Yes.

19 Q. Did she talk with Maxwell about her family?

20 A. Yes.

21 Q. Did she talk with her about her home life and
22 living with her mother?

23 A. Yes.

24 Q. From what [REDACTED] told you, when she got there who
25 else was at the ranch besides Ghislaine Maxwell and

1 Jeffrey Epstein?

2 A. It was just them.

3 Q. Was it just the three of them the entire weekend
4 of the visit?

5 A. Yes.

6 Q. Were there any other school kids there?

7 A. No.

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

10 A. Yes.

11 Q. Did she say anything to her about foot massages?

12 A. Yes.

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

14 A. Maxwell told [REDACTED] to give Epstein a foot massage,
15 and then she showed her and instructed her how to do it.

16 [REDACTED] was a little uncomfortable, but Maxwell was joking
17 around so she just followed her lead.

18 Q. Did [REDACTED] tell you what Maxwell and Epstein took
19 her to the movies that weekend?

20 A. Yes.

21 Q. What did she tell you about that trip to the
22 movies?

23 A. She said that when they went outside the theatre
24 Maxwell was joking around and pulled Epstein's pants down a
25 little bit. And then once they went inside the theatre,

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1 Epstein -- when they were sitting down, Epstein touched
2 [REDACTED] leg, he rubbed her arm, held her hand. And this
3 time he -- [REDACTED] felt that he wasn't trying to hide it from
4 Maxwell.

5 Q. What was [REDACTED] reaction to all of this?

6 A. She was uncomfortable.

7 Q. During the same weekend, was there another
8 occasion when Maxwell talked about massages?

9 A. Yes.

10 Q. What happened?

11 A. Maxwell had asked [REDACTED] if she ever had a massage,
12 and Maxwell told her she could give her one. So [REDACTED] was
13 on her back and Maxwell had pulled the sheet down exposing
14 her chest, she was nude from the top up, and proceeded to
15 massage around her chest and breast area.

16 Q. From what [REDACTED] told you when she was describing
17 to you what you just described to the grand jury, how did
18 she feel while this was happening?

19 A. She felt really uncomfortable.

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

22 A. Yes.

23 Q. What did she tell you happened?

24 A. She said she was in bed and Epstein came into the
25 room and told her that he wanted to cuddle. So he laid down

1 next to her and spooned her. She told him she had to go to
2 the bathroom to get out of the situation.

3 Q. What was her reaction to that when Epstein got
4 into her bed?

5 A. She was uncomfortable. She didn't know what to
6 do.

7 Q. Did [REDACTED] go back home to Arizona when the weekend
8 was over?

9 A. Yes, she did.

10 Q. Did she tell anyone when she got home about what
11 happened?

12 A. No.

13 Q. Is that for the same reason you described earlier?

14 A. Yes.

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

17 A. Yes.

18 Q. Did [REDACTED] have any contact with Maxwell or Epstein
19 after that trip?

20 A. Not that she recalled.

21 Q. When you interviewed [REDACTED] what was her demeanor
22 like when she described her interactions with
23 Jeffrey Epstein and Ghislaine Maxwell?

24 A. She became upset, emotional.

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

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1 against Maxwell and Epstein's estate?

2 A. Yes, she is.

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

4 A. She's a psychologist who works with trauma
5 victims.

6 Q. During the course of this investigation, have you
7 interviewed someone named [REDACTED] [REDACTED]?

8 A. Yes.

9 Q. For today's purposes, I'm just going to refer to
10 her as [REDACTED]. How many times have you interviewed [REDACTED]
11 approximately?

12 A. Approximately three times.

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

15 A. Yes.

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

18 A. Yes.

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

20 A. Yes.

21 Q. Did [REDACTED] grow up in England?

22 A. Yes, she did.

23 Q. Did she tell you that there came a point when she
24 met Ghislaine Maxwell when she was about 17?

25 A. Yes.

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1 Q. How did she tell you that they met?

2 A. She said they met through a mutual friend.

3 Q. Did she tell you that this would've happened in 4
around 1994 or 1995?

5 A. Yes.

6 Q. And is that within the same time period that we've
7 been talking about today?

8 A. Yes.

9 Q. What happened after she was introduced to
10 Ghislaine Maxwell from what she told you?

11 A. She said Maxwell treated her like they were
12 sisters. Her quote was, "like naughty school girls" is how
13 Maxwell treated with -- her.

14 Q. Did she tell you that Maxwell seemed to
15 immediately take an interest in her?

16 A. Yes.

17 Q. Did she tell you that they began spending time
18 together in London?

19 A. Yes.

20 Q. And just to be clear, was Maxwell in her 30's
21 while this was happening?

22 A. Yes.

23 Q. Did Maxwell -- did [REDACTED] ever remember Maxwell
24 ever talk about having a boyfriend named Jeffrey Epstein?

25 A. Yes.

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

2 A. Maxwell told [REDACTED] that Epstein was going to
3 like her.

4 Q. Did there come a time when she was 17 that [REDACTED]
5 described that Maxwell introduced her to Jeffrey Epstein?

6 A. Yes.

7 Q. How did she describe that occurring?

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

15 Q. Now, you testified just a moment ago that Maxwell
16 -- that [REDACTED] described to you that Maxwell asked her to
17 give Epstein a massage during this first meeting. Is that
18 correct?

19 A. Yes.

20 Q. Did Maxwell say to her in sum and substance since
21 you're so strong I'd appreciate it if you give Jeffrey a
22 massage because he needs a massage every day or I get in
23 trouble?

24 A. Yes, she said that.

25 Q. Is that what [REDACTED] said to you in sum and

1 substance?

2 A. Yes.

3 Q. When that happened, did [REDACTED] remember Maxwell
4 leading her to a room in the house?

5 A. Yes.

6 Q. What happened?

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

11 Q. What does [REDACTED] remember Epstein saying when he
12 did this?

13 A. Don't be frigid.

14 Q. What was her reaction to this happening from what
15 she told you?

16 A. She was taken back by it.

17 Q. When this episode ended and [REDACTED] left the room
18 did she tell you that she remembered Maxwell being just
19 outside the room when she left?

20 A. Yes.

21 Q. Did she remember Maxwell saying to her, did you
22 have fun? Did he like it?

23 A. Yes.

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

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1 A. Yes, she did.

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

5 A. Yes.

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

8 A. Yes.

9 Q. And when she got there did she tell you she
10 remembered Maxwell saying to her, in substance, thank God
11 you're here; if it's not you or someone it falls to 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 Palm
24 Beach, U.S. Virgin Islands, Paris, and New York for the next
25 several years?

1 A. Yes, they did.

2 Q. Does she remember whether these trips began before
3 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 that she spent
7 with Maxwell when they first met when she was 17. Is that
8 right?

9 A. Yes.

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

14 A. Yes.

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

19 A. Yes.

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

23 A. Yes, he did.

24 Q. Did Epstein give her money?

25 A. Yes.

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

2 A. Yes.

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

6 A. Yes.

7 Q. And was the massager device like a vibrator?

8 A. Yes, it was.

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

11 A. Maxwell wasn't in the room.

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

15 A. Yes. She was usually right near the room.

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

19 A. Yes.

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

25 A. Yes, she said that.

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1 Q. Did [REDACTED] tell you about an incident that
2 occurred after she turned 18 in Palm Beach when she was
3 staying at the Palm Beach house?

4 A. Yes.

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

7 A. Yes, it did.

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

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

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

20 A. She was crying; she was very upset.

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

24 A. Yes.

25 Q. Does she remember that later in the day, after she

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1 had delivered Epstein his tea and he assaulted her, does she
2 remember Maxwell telling her 'I heard you did well?'

3 A. Yes.

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

8 A. Yes.

9 Q. Does she remember Maxwell saying, in sum and
10 substance, 'do you know anyone who can give him a blow job
11 today; I don't feel like it?'

12 A. Yes.

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

16 A. Yes.

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

19 A. [REDACTED] didn't bring any girls.

20 Q. Did she tell you why not?

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

22 Q. From your interviews with [REDACTED] did she tell you
23 that there came a time when she was in her early 20s when
24 she stopped traveling with Maxwell and Epstein?

25 A. Yes.

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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 20s?

5 A. Yes, she did.

6 Q. What is her current profession?

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

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

11 A. Yes, she did.

12 Q. And were those emails very friendly in tone?

13 A. Yes, they were.

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

16 A. She said she didn't, at the time, want to
17 acknowledge what was going on to her; that looking back on
18 it's different.

19 Q. Did your squad at the FBI execute a search warrant
20 at Jeffery Epstein's townhouse in Manhattan in July 2019?

21 A. Yes.

22 Q. Did you personally participate in the search of
23 Epstein's residence?

24 A. Yes, I did.

25 Q. Did the townhouse include a massage room?

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1 A. Yes.

2 Q. Have you yourself been in that massage room?

3 A. Yes, I have.

4 Q. Could you please describe for the grand jury what
5 that massage room looked like?

6 A. It was dark. It had dark draperies covering the
7 windows. There was a massage table. There were oils.
8 There was a hand-held massager in there along with
9 handcuffs, a whip, and along the walls were nude photographs
10 of young females.

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

16 A. Yes, we did.

17 Q. Where did you find it?

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

19 Q. And to be clear, did the FBI find sex toys during
20 the search?

21 A. Yes.

22 Q. What was found?

23 A. Butt plugs, dildo, vibrators.

24 Q. We've talked about three minor girls today, [REDACTED]

25 [REDACTED] and [REDACTED] is that right?

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1 A. Yes.

2 Q. Have you reviewed the proposed indictment, marked
3 Grand Jury Exhibit 1?

4 A. Yes, I have.

5 Q. Is [REDACTED] the individual referred to as Victim 1 in
6 the proposed indictment?

7 A. Yes.

8 Q. Is [REDACTED] the individual referred to as Victim 2 in
9 the proposed indictment?

10 A. Yes.

11 Q. Is [REDACTED] the individual referred to as Victim 3
12 in the indictment?

13 A. Yes.

14 Q. During all of Maxwell's interactions with the
15 victims when they were underage girls, based on the
16 timeframe and your knowledge of Maxwell's birth date, was
17 she in her 30s?

18 A. Yes, she was.

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

23 A. Yes.

24 Q. Could you please explain for the grand jury what
25 is a deposition?

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1 A. It is a statement made under oath.

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

6 A. Yes.

7 Q. And is deposition testimony live and in person and
8 under oath?

9 A. Yes.

10 Q. Is a court reporter present when a deposition
11 takes place?

12 A. Yes.

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

19 A. Yes.

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

21 A. Yes, she was.

22 Q. Was the lawsuit captioned [REDACTED] [REDACTED] against
23 Ghislaine Maxwell with Docket Number 15-CV-7433 here in the
24 Southern District of New York?

25 A. Yes.

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1 Q. Generally speaking, in broad strokes, what was the
2 lawsuit about? What was the claim that [REDACTED] was bringing
3 against Maxwell?

4 A. [REDACTED] had stated that she had been sexually
5 abused by Epstein and Maxwell as a minor. Maxwell came
6 forward publically and called her a liar. So [REDACTED] sued
7 her for defamation.

8 MS. [REDACTED] So just a small legal instruction on
9 this topic. Ladies and gentleman, I instruct you that the
10 allegations in the lawsuit are not being presented to you as
11 evidence that those incidents occurred. I instruct you that
12 you should not consider those allegations for their truth;
13 instead, the circumstances of the lawsuit are being
14 presented to you so that you can consider the context of the
15 case and the circumstances under which Maxwell made
16 statements under oath.

17 BY MS. [REDACTED]:

18 Q. Turning back to the deposition. Did Maxwell's
19 deposition take place over two different days?

20 A. Yes.

21 Q. On both days did she give testimony in Manhattan?

22 A. Yes, she did.

23 Q. Is that where the deposition took place?

24 A. Yes.

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

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1 A. Yes.

2 Q. If you could flip through the remaining slides in
3 the presentation. Do those slides contain true and accurate
4 excerpts of the transcript of that deposition?

5 A. Yes.

6 Q. Turning to the next slide, is this the cover page
7 of the transcript of the first deposition that took place on
8 April 22, 2016?

9 A. Yes.

10 Q. And does it have the case caption on it?

11 A. Yes, it does.

12 Q. Turning to the next slide, is this an excerpt from
13 the transcript?

14 A. Yes.

15 Q. I imagine the grand juries can't read it from
16 their seats so if you could read it with me, I'll read the
17 questions and if you could read the answers.

18 Question: "Did Jeffrey Epstein have a scheme to
19 recruit underage girls for underage massages?"

20 And it appears there was an objection from the
21 lawyer.

22 Question: "If you know."

23 A. Answer: "I don't know what you are talking about."

24 Q. Just to be clear with the question and answer, is
25 the answer here Maxwell's testimony?

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1 A. Yes.

2 Q. Just to be clear, you testified earlier that [REDACTED]
3 participated in sexualized massages with Epstein and
4 Maxwell; is that right?

5 A. Yes.

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

7 A. Yes.

8 Q. And did you also testify earlier that Maxwell --
9 that [REDACTED] [REDACTED] told you that Maxwell asked her to
10 give Epstein massages when she was a minor?

11 A. Yes.

12 Q. If you could turn to the next slide, please. Is
13 this another excerpt from that same deposition?

14 A. Yes, it is.

15 Q. All right. I'll read the question and you can
16 read the answer.

17 Question: "List all the people under the age of 18
18 that you've interacted with at any of Jeffrey Epstein's
19 properties?"

20 A. Maxwell's answer: "I'm not aware of anybody that I
21 interacted with, other than obviously [REDACTED], who was 17
22 at this point."

23 Q. Just to be clear, you testified earlier about two
24 girls under the age of 18 who interacted with Maxwell at
25 Epstein's properties; is that correct?

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1 A. Yes.

2 Q. And those individuals were [REDACTED] and
3 [REDACTED] who told you that, correct?

4 A. Yes, that's correct.

5 Q. Turning to the next slide, is this the cover page
6 of the transcript from the deposition that took place on
7 July 22, 2016?

8 A. Yes.

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

11 A. Yes.

12 Q. If you could please turn to the next slide. Is
13 that an excerpt -- are these two excerpts from that
14 deposition?

15 A. Yes.

16 Q. Again, I'll read the questions if you could please
17 read the answers.

18 Question: "Were you aware of the presence of sex
19 toys or devices used in sexual activities in Mr. Epstein's
20 Palm Beach house?"

21 There's an objection from the lawyer.

22 A. Maxwell's answer: "No, not that I recall."

23 Q. "Do you know whether Mr. Epstein possessed sex
24 toys or devices used in sexual activities?"

25 There's an objection from the lawyer.

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1 A. Maxwell's answer: "No."

2 Q. Just to be clear, you testified earlier that

3 [REDACTED] told you he found sex toys in the massage room
4 in Palm Beach and also that he had seen that Maxwell had a
5 basket of sex toys in her closet there; is that correct?

6 A. Yes, that's correct.

7 Q. And is it correct that you testified earlier that
8 Epstein had used a vibrator on [REDACTED] [REDACTED] is that
9 correct?

10 A. Yes, that's correct.

11 Q. And did you also testify earlier that

12 [REDACTED] [REDACTED] told you he did that, as well?

13 A. Yes, that's correct.

14 Q. And did you also testify earlier that sex toys
15 were found by the police in the Palm Beach house in 2005; is
16 that right?

17 A. Yes.

18 Q. And did you also testify earlier that the FBI
19 found sex toys in Epstein's New York City townhouse in 2019?

20 A. Yes, that's correct.

21 Q. If you could please turn to the next slide. This
22 is on page 27. Is this -- are these also excerpts from that
23 same deposition?

24 A. Yes.

25 Q. Again, I'll read the questions if you could please

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1 read the answers.

2 Questions: "Other than yourself, and the blonde
3 and brunette that you have identified as having been
4 involved in three-way sexual activities, with whom did
5 Mr. Epstein have sexual activities?"

6 There's an objection from the lawyer.

7 A. Maxwell's answer: "I wasn't aware that he was
8 having sexual activities with anyone when I was with him
9 other than myself."

10 Q. Question: "I want to be sure that I'm clear, is it
11 your testimony that in the 1990s and 2000s you were not
12 aware that Mr. Epstein was having sexual activities with
13 anyone other than yourself and the blonde and brunette on
14 those few occasions when they were involved with you?"

15 A. Maxwell's answer: "That is my testimony. That is
16 correct."

17 Q. Have you reviewed the deposition transcript --

18 A. Yes.

19 Q. -- in full? Now, the excerpt we just read has a
20 reference to a blonde and brunette. Are those individuals
21 completely different from the individuals we've been talking
22 about today?

23 A. Yes.

24 Q. Just to be clear, is it correct that you testified
25 earlier that [REDACTED] and [REDACTED] told you that Epstein

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1 sexually abused them repeatedly; is that correct?

2 A. Yes.

3 Q. And did you also testify earlier that Maxwell was
4 occasionally present when Epstein was abusing [REDACTED] based
5 on what she told you?

6 A. Yes, that's correct.

7 Q. Turning to the next slide, is this also an excerpt
8 from the same deposition?

9 A. I'm sorry?

10 Q. I'm so sorry. Turning to the next slide, on page
11 28, is this also an excerpt from the same deposition?

12 A. Yes.

13 Q. Thank you. Okay. Again, if we could read that
14 together I'll take the question if you could take the
15 answer.

16 Question: "Let's just tie that down. Is it your
17 testimony that you've never given anybody a massage?"

18 A. Maxwell's answer: "I have not given anyone a
19 massage."

20 Q. "You never gave Mr. Epstein a massage; is that
21 your testimony?"

22 A. Maxwell's answer: "That is my testimony."

23 Q. "You never gave [REDACTED] [REDACTED] a massage; is that
24 your testimony?"

25 A. Maxwell's answer: "I never gave [REDACTED] [REDACTED] a

1 message."

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

5 A. Yes.

6 Q. Have you told the grand jury everything that you
7 know about this case or have you just answered the questions
8 that I've asked?

9 A. I've just answered the questions you've asked.

10 Q. And when you testified about the documents that
11 you reviewed or the conversations that you had with others,
12 were you testifying to the exact words used or just the
13 substance of the documents or conversations?

14 A. The substance?

15 Q. And are you willing to return to the grand jury if
16 the grand jury has any further questions for you?

17 A. Yes.

18 MS. [REDACTED] With the Foreperson's permission I'd
19 ask that the witness be excused at this time.

20 FOREPERSON. You're excused.

21 MS. [REDACTED]. Thank you.

22 (Witness Excused)

23 (Time Noted: 11:41 a.m.)

24 (Colloquy Follows)

25

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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.

July 6, 2020
Date



Acting Grand Jury Reporter
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