

# EXHIBIT 1

## (FILE UNDER SEAL)

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

-----x  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v. Case No:  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----x

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

Reported by:  
JEREMY RICHMAN  
JOB NO: 300491

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

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4 February 17, 2017

5 9:00 a.m.

6

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

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2 APPEARANCES:

3

4 BOIES, SCHILLER & FLEXNER, LLP

5 Attorneys for plaintiff

6 401 East Las Olas Boulevard, Suite 1200

7 Fort Lauderdale, FL 33301-2211

8 BY: SIGRID STONE MCCAWLEY, ESQ.

9 (smccawley@bsfllp.com)

10

11

12 HADDON, MORGAN AND FOREMAN, P.C

13 Attorneys for Defendant

14 150 East 10th Avenue

15 Denver, CO 80230

16 BY: LAURA A. MENNINGER, ESQ.

17 JEFFREY S. PAGLIUCA, ESQ.

18 (lmenninger@hmflaw.com)

19 (jpagliuca@hmflaw.com)

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2 APPEARANCES (Continued) :

3

4 J. STANLEY POTTINGER, PLLC

5 Attorneys for the witness

6 49 Twin Lakes Road, Suite 100

7 South Salem, NY 10590

8 BY: J. STANLEY POTTINGER, ESQ.

9 (stanpottinger@aol.com)

10

11

12 MINTZ & GOLD, LLP

13 Attorneys for the witness

14 600 Third Avenue

15 New York, NY 10016

16 BY: PETER GUIRGUIS, ESQ.

17 (guirguis@mintzandgold.com)

18

19

20 ALSO PRESENT:

21 GHISLAINE MAXWELL, via teleconference

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

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

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

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

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

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

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

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

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

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2 and testified as follows:

3 EXAMINATION BY

4 MS. MENNINGER:

5 Q. Good morning, Ms. Ransome.

6 A. Good morning.

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

9 A. Sarah Emma Ashley Ransome.

10 Q. And what is your birth date?

11 A. 13th of the 8th, 1984.

12 Q. And what is your current  
13 address?14 MR. GUIRGUIS: I'm going to  
15 object to current address.

16 Q. You can answer.

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

19 A. It was Carrer de Canuda.

20 (An off-the-record  
21 discussion was held.)22 A. That's Barcelona, and I  
23 can't remember the post code.24 Q. And what does that mean,  
25 that's your last permanent address?

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2 A. I reside there.

3 Q. Do you rent an apartment?

4 A. My partner does.

5 Q. Who is your partner?

6 MR. GUIRGUIS: Objection.

7 Q. Who is your partner?

8 THE WITNESS: Do I have to

9 answer that?

10 MR. GUIRGUIS: Yes.

11 A. Peter Coulthard.

12 Q. I'm sorry?

13 A. Peter Coulthard.

14 Q. How do you spell that last

15 name?

16 A. C-O-U-L-T-H-A-R-D.

17 Q. And how long has Peter been

18 your partner?

19 MR. GUIRGUIS: I'm going to

20 object. I'm not sure what the

21 relevance of this is or where

22 you're going with this.

23 Q. How long has Peter been your

24 partner?

25 THE WITNESS: Sorry, can I

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

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

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

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

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

17 Q. And what is your current  
18 occupation?

19 A. I'm a writer.

20 Q. And what do you write?

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

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

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

4 Q. Are you employed?

5 A. Nope.

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

8 A. My partner --

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

11 You don't have to answer  
12 that.

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

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

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

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

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

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

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

16 MR. GUIRGUIS: I just  
17 objected.

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

25 MS. MENNINGER: I have asked

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

5 MS. MCCAWLEY: Yes.

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

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

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

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

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

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

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

24 A. No.

25 Q. Have you sought to have your

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2 writing published by anyone?

3 A. No.

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

6 MR. GUIRGUIS: Objection.

7 MS. MCCAWLEY: Objection.

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

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

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

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

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

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

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

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

14 A. Elizabeth Shaw and Mark  
15 Ransome.

16 Q. How do you spell Shaw?

17 A. S-H-A-W.

18 Q. And where do your parents  
19 live?

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

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

25 MS. MCCAWLEY: Do you want

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2 to confer?

3 MR. GUIRGUIS: Give me a  
4 moment on this.5 THE WITNESS: We're really  
6 well organized.

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

8 (Recess.)

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

10 Q. Ms. Ransome, there was a  
11 question pending when you took a break  
12 with your lawyers. Can you please  
13 answer the question.14 MR. GUIRGUIS: I'm  
15 instructing the witness not to  
16 answer questions regarding  
17 current information about her own  
18 location, her family's location,  
19 things of that nature.20 The witness has expressed to  
21 me fears of harassment and the  
22 belief that she's being followed,  
23 and my understanding is that  
24 there are other witnesses that  
25 have had similar fears and

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

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

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

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

20 MS. MENNINGER: All right.

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

24 A. Yes.

25 Q. Did you voluntarily agree to

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2 do that?

3 A. Yes.

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

7 A. No.

8 Q. Were you provided legal  
9 counsel?

10 A. Sorry, does that mean --

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

13 MR. GUIRGUIS: Yes.

14 A. Yes.

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

17 A. Three.

18 MS. MENNINGER: I would like  
19 the record to reflect that  
20 witness is checking with the  
21 lawyers to get answers to these  
22 questions.23 MR. POTTINGER: Wait, wait,  
24 wait. Objection.

25 MR. GUIRGUIS: There is

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2 absolutely no exchange. No words  
3 were spoken by --

4 MS. MENNINGER:

5 Mr. Pottinger, did you put up a  
6 number of fingers?

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

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

13 MS. MENNINGER: Mm-hmm.

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

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

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

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

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

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

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

18 MR. POTTINGER: I am not.

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

21 A. Three.

22 Q. Can you please name them?

23 A. Peter, Sigrid and Stan.

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

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2 A. Yes.

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

5 A. No.

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

8 A. Yes.

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

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

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

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

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

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

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

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

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

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

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

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

15 That's five, correct?

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

18 Q. No, you cannot.

19 A. Okay.

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

22 MR. GUIRGUIS: Objection.

23 Q. Yes or no?

24 A. Yes.

25 Q. All right. Anyone else

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2 representing you?

3 A. No.

4 Q. Ms. Schultz? Is

5 Ms. Meredith Schultz representing you?

6 A. No.

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

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

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

13 A. No.

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

16 A. No.

17 MR. GUIRGUIS: Objection.

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

20 MR. GUIRGUIS: Objection.

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

24 A. A few, maybe.

25 Q. How many?

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2 A. About 11 hours in total.

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

5 MR. GUIRGUIS: Objection.

6 MS. MCCAWLEY: You can  
7 answer.

8 MR. GUIRGUIS: You can  
9 answer.

10 A. Yesterday.

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

13 A. Yes.

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

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

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

21 A. No.

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

24 A. I don't know.

25 Q. How many hours have you

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2 spent with Ms. McCawley?

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

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

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

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

17 A. Many, many hours.

18 Q. Approximately how many?

19 A. I don't know.

20 Q. Five?

21 MR. GUIRGUIS: Objection.

22 A. More than five.

23 Q. Ten?

24 MR. GUIRGUIS: Objection.

25 Q. Ten?

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

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

8 A. I think it was --

9 Q. Without telling me what you  
10 said.

11 A. I think it was November.

12 Q. November what?

13 A. I can't remember the date.

14 Q. Early November? Late  
15 November?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

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

20 A. Cell phone.

21 Q. A mobile number or a  
22 landline?

23 A. A cell phone.

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

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2 A. I don't have it anymore.

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

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

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

11 A. About eight months.

12 Q. What happened to it?

13 A. I got rid of it.

14 Q. Why?

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

18 Q. What did you do with it?

19 A. I sold it.

20 Q. When?

21 A. November.

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

24 A. Before.

25 Q. So then how did you speak

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1 HIGHLY CONFIDENTIAL AEO  
2 with Ms. McCawley over the phone?  
3 A. On my partner's cell phone.  
4 Q. What's his cell phone  
5 number?

6 MS. MCCAWLEY: Objection.  
7 What's the relevance of her  
8 partner's cell phone?

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

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

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

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

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

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2 Q. When in November?

3 A. I can't remember.

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

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

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

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

12 Q. And where was that meeting?

13 A. Barcelona.

14 Q. Where in Barcelona?

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

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

19 A. In a hotel.

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

22 A. Two days.

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

25 A. Gosh, about 16.

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

4 MS. MCCAWLEY: Objection.

5 A. The same amount.

6 Q. He was with Mr. Pottinger?

7 A. Yeah, yes.

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

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

12 Q. Have you met him?

13 A. No.

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

16 A. No.

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

20 A. Yes.

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

25 MR. GUIRGUIS: Objection.

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2 A. No.  
3 Q. Did you fly over here?  
4 A. Yes.  
5 Q. From Barcelona?  
6 A. Yes.  
7 Q. Did you pay for the plane  
8 ticket?  
9 A. Yes.  
10 Q. How much was the plane  
11 ticket?  
12 A. It was -- I think it was  
13 1,000 -- it was 1,000 -- I can't  
14 remember the exact total.  
15 Q. Has anyone agreed to  
16 reimburse you for that?  
17 A. No.  
18 Q. And you're staying where  
19 while you're here?  
20 MR. GUIRGUIS: Objection.  
21 And direct you not to answer  
22 that.  
23 Q. Are you staying in a hotel  
24 while you're here?  
25 MR. GUIRGUIS: You can

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2 answer that.

3 A. Yeah.

4 Q. Are you paying for that?

5 MR. GUIRGUIS: Objection.

6 I'm directing you not to  
7 answer.8 MS. MCCAWLEY: You can  
9 answer.10 MR. GUIRGUIS: I think you  
11 can answer.12 MS. MCCAWLEY: Yeah, I think  
13 you can answer.14 MR. GUIRGUIS: That's fine.  
15 I agree.16 MS. MCCAWLEY: You're a  
17 nonparty witness. You can answer  
18 that question.

19 MS. MENNINGER: Who is --

20 MS. MCCAWLEY: I am  
21 representing Virginia. He is  
22 representing the witness.23 MS. MENNINGER: Well, you're  
24 representing the witness as well,  
25 right?

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2 MS. MCCAWLEY: I'm not.

3 MS. MENNINGER: Well, did

4 you just tell her she can answer

5 a question?

6 MS. MCCAWLEY: I did.

7 Q. Are you paying for the

8 hotel?

9 A. No.

10 Q. Who's paying for the hotel?

11 A. It's on expenses, I think,

12 of a witness. It's expenses from --

13 yeah, I don't know, actually.

14 Q. You don't know who is paying

15 for your hotel?

16 A. No.

17 Q. It's not you?

18 A. No.

19 Q. And how much per night is

20 your hotel?

21 A. I have no idea.

22 Q. How long are you staying

23 here on this trip?

24 A. Just for the deposition.

25 Q. Okay. When did you arrive?

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

4 Q. And when are you leaving?

5 A. Tomorrow evening.

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

10 A. No.

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

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

15 A. Sorry.

16 Q. Have you been given anything  
17 else?

18 A. No.

19 Q. Have you been promised  
20 anything else?

21 A. No.

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

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

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

10 A. Yes.

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

13 A. No.

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

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

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

21 A. Oh, no. No.

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

24 A. No. No.

25 Q. All right. So have you had

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2 any agreements regarding writing a

3 book --

4 A. No.

5 Q. -- about your experience?

6 You have to wait for me to

7 finish my question.

8 Have you had any agreements

9 with your lawyers about media rights

10 in any form?

11 MR. GUIRGUIS: Objection to

12 the extent that you're asking

13 about communications with the

14 attorneys.

15 MS. MENNINGER: I'm asking

16 about her arrangement with her

17 attorneys, which is not

18 privileged.

19 A. Can you please repeat the

20 question.

21 Q. Have you reached any

22 agreement with your attorneys

23 regarding media rights for your story?

24 A. No.

25 Q. Have you talked to anyone

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2 about publishing anything relating to  
3 your story?

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

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

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

10 A. Yes, I have.

11 Q. Who have spoken to?

12 A. The New York Post.

13 Q. Who at the New York Post?

14 A. Maureen Callahan.

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

17 A. I think it was later  
18 October.

19 Q. Have you spoken with her  
20 since?

21 A. No.

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

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

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2 Q. And what was -- what did you  
3 tell her in your phone call?4 A. I told her what Jeffrey  
5 Epstein and Ghislaine Maxwell did to  
6 me and the other girls.7 Q. Did she give you any money  
8 in exchange for that interview?

9 A. No.

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

12 A. No.

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

25 Q. Where is the email that you

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2 wrote her?

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

5 Q. Okay. In your Yahoo  
6 account?

7 A. Yes.

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

11 A. Yes.

12 Q. And what was that agreement?

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

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

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

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

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

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

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

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

8 A. Yes.

9 Q. More than one?

10 A. Yes.

11 Q. How many?

12 A. I can't remember.

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

15 A. Less than ten.

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

18 A. Just one.

19 Q. And it lasted about 30  
20 minutes?

21 A. About that.

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

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

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

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

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

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

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

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

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

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2 just same old stuff, just continuing.  
3 I thought he had stopped abusing  
4 girls.

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

8 A. I can't remember.

9 Q. Anything at all?

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

12 Q. The question is what you  
13 remember.

14 A. I can't remember.

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

17 MS. MCCAWLEY: Asked and  
18 answered objection.

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

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

24 A. Yes.

25 Q. What do you know about other

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2 girls being frightened?

3 A. I know that the girls on the  
4 island and in New York during my time  
5 with Jeffrey and Ghislaine, that they  
6 were frightened.7 Q. Okay. What are the names of  
8 those girls?

9 A. Natalya Malyshев. [REDACTED]

10 -- I don't know her surname. I can't  
11 remember her surname.12 Q. How do you spell the first  
13 name?14 A. [REDACTED] -- I'm just taking a  
15 guess, [REDACTED], I'm guessing, I  
16 think.17 MR. GUIRGUIS: I'm going to  
18 remind the witness I told her not  
19 to speculate, but that's okay.20 Q. In addition to Natalya  
21 Malyshev and [REDACTED], what are the  
22 names of the other girls who you  
23 believe are frightened?24 A. Jennifer. There were a  
25 couple other girls I met during my

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2 time with Ghislaine and Jeffrey that  
3 were frightened.

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

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

11 Q. Okay. Please describe them.

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

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

17 A. Okay. On the island --

18 MR. GUIRGUIS: Objection.

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

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

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2 names.  
3 You gave me three, correct?  
4 A. Yes.  
5 Q. You said there were two  
6 others, correct?  
7 A. Mm-hmm.  
8 Q. What did those two other  
9 girls look like?  
10 A. I can't really remember.  
11 One had blonde hair; long, blonde  
12 hair.  
13 Q. Anything else about that?  
14 A. I can't remember.  
15 Q. The other girl, can you  
16 remember her hair color?  
17 A. No, I can't remember.  
18 Q. Do you know the height of  
19 either one of them?  
20 A. No, I can't remember.  
21 Q. Do you have a photograph of  
22 either one of them?  
23 A. No.  
24 Q. And where did you meet these  
25 two other girls?

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2 A. In New York.

3 Q. Where in New York?

4 A. I can't remember.

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

7 A. No. It was ten years ago.

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

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

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

15 A. I can't remember.

16 Q. What is Jennifer's last  
17 name?

18 A. I don't know.

19 Q. What does Jennifer look  
20 like?

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

22 Q. How long?

23 A. Long, long hair.

24 Q. Longer than your hair now?

25 A. I think so. I think it was

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2 longer.

3 Q. So middle of her back?

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

6 Q. Where did you meet Jennifer?

7 A. I met Jennifer first in New  
8 York.

9 Q. Where in New York?

10 A. I can't remember.

11 Q. Anywhere in New York? You  
12 can't remember at all?13 A. I can't remember the  
14 location.15 Q. Was it at Mr. Epstein's  
16 home?

17 MR. GUIRGUIS: Objection.

18 You have asked her now almost 20  
19 questions about where she met  
20 these girls, and she has  
21 consistently said that she does  
22 not remember.23 Q. Was it in Mr. Epstein's  
24 home?

25 A. No.

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2 Q. Was it at a club?

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

7 Q. Was it at a club?

8 A. One was at a club.

9 Q. Which one?

10 A. Natalya Malyshew.

11 Q. Where did you meet [REDACTED]?

12 A. I first met [REDACTED] on the  
13 island.14 Q. Did you meet her a second  
15 time?

16 A. Yes.

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

19 A. I can't remember.

20 Q. State?

21 A. Can't remember.

22 Q. Country?

23 A. Well, U.S.

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

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2 go to the bathroom. Sorry.  
3 MS. MENNINGER: Yes, I don't  
4 think I have a question pending.  
5 We'll go off the record now.

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

7 (Recess.)

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

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

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

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

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

20 A. Yes.

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

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

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2 A. No.

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

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

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

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

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

17 A. No.

18 Q. Nowhere?

19 A. No.

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

22 A. Yes.

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

25 A. I can't remember. It was

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2 quite some time ago.

3 Q. What do you recall about it?

4 A. She came forward and I

5 was -- it was a few years ago that she

6 came forward, and her story was

7 exactly the same as mine.

8 I can't remember

9 specifically what article I read, but

10 every single article I did read during

11 the duration of that time, she

12 experienced the same thing I did.

13 So it was more or less the

14 same context and it's the same story

15 in all articles, really.

16 Q. So you were reading these

17 articles over the course of a period

18 of ten years, you think?

19 A. Yeah. I didn't pay much

20 attention to it because I've spent the

21 last ten years trying to get over that

22 experience, and I've been frightened

23 to come forward.

24 Q. And when you read the

25 articles, you noticed that there were

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

4 MS. MCCAWLEY: Objection.

5 A. They were details that were  
6 exactly the same as what I had  
7 experienced.8 Q. Do you know whether anyone  
9 else had brought lawsuits against  
10 Mr. Epstein?

11 A. No.

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

14 A. Sorry, can you repeat that.

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

17 A. No.

18 Q. Where did you grow up?

19 A. I grew up in South Africa.  
20 I then finished school in Scotland.21 Q. When did you move to  
22 Scotland? How old were you?

23 A. I was 14.

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

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2 A. Just myself.

3 Q. Are you a South African  
4 citizen?

5 A. Yes.

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

8 A. Well, yeah. It was stolen.

9 I'm reapplying for a new one. I have  
10 to renew my South African passport.

11 It was stolen. South Africa for you.

12 Q. So when did you get that  
13 South African passport?14 A. I can't remember. I've had  
15 a South African passport my whole  
16 life, so....

17 Q. And when was it stolen?

18 A. I think it was 2014, 2015.

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

23 Have I got that right?

24 A. Mm-hmm.

25 Q. Yes or no?

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2 MR. GUIRGUIS: Objection to  
3 form.

4 You can answer.

5 A. Yes.

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

8 A. Yes.

9 Q. How did that come about?

10 A. My mom's side of the family  
11 is British.12 Q. And when did you get a  
13 British passport?14 A. I think when I was about  
15 five.16 Q. Do you have a dual  
17 citizenship?

18 A. Yes.

19 Q. And do you travel using both  
20 passports?21 A. It's really complicated. I  
22 only use my South African passport  
23 when I enter into South Africa. So  
24 that's the only time I use my South  
25 African passport, then.

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

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

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

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

15 A. Yes.

16 Q. How many?

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

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

23 A. No.

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

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

4 MR. GUIRGUIS: Objection.  
5 You can answer.

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

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

11 Q. And cousins?

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

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

16 A. About three years.

17 Q. Did you graduate?

18 A. Yep, yes.

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

21 A. Yeah, it is.

22 Q. Did you go to college?

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

25 Q. Where did you go?

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2 A. Queen Margaret University in  
3 Edinburgh.

4 Q. Did you graduate?

5 A. No, I didn't.

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

9 A. No.

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

12 A. 2004.

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

15 A. A year and a half.

16 Q. Why did you leave college?

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

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

23 A. Yes.

24 Q. Where did you work?

25 A. I was a waitress at a bar.

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2 Q. Anything else?

3 A. No.

4 Q. Have you ever been married?

5 A. No.

6 Q. Have you ever been engaged?

7 A. Yes.

8 Q. To whom?

9 A. Peter Coulthard.

10 Q. Your current partner?

11 A. Yes.

12 Q. Anyone else?

13 A. Yes, I have.

14 Q. Who else have you been

15 engaged to?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 A. I don't really see the

19 relevance in that.

20 Q. Who else have you been

21 engaged to?

22 A. Andrew Ralph.

23 Q. Was he listed in your

24 passport?

25 A. Yes.

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2 Q. Anyone else?

3 A. Listed on my passport?

4 Sorry.

5 Q. Have you been engaged to  
6 anyone else?7 A. Oh, sorry. I've got a  
8 really bad train... No.9 Q. During what period of time  
10 were you engaged to Andrew Rolph?

11 A. I can't remember.

12 Q. Was it before 2006 or after?

13 A. After.

14 Q. How long after?

15 A. Three years.

16 Q. Did you know Mr. Rolph  
17 during 2006?

18 A. It's Ralph, sorry.

19 R-A-L-P-H.

20 Vaguely, vaguely. We lost  
21 contact.

22 Q. When did you lose contact?

23 A. In 2006.

24 Q. And when did you reestablish  
25 contact?

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2 A. 2008.

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

5 A. No.

6 Q. Do you go by SarahEmmaAshley  
7 online?

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

10 Q. On Twitter?

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

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

16 A. I can't remember.

17 Q. Do you have any tattoos?

18 A. Yes.

19 Q. Where?

20 A. One here.

21 Q. Indicating on your arm?

22 A. Indicating on my arm, sorry.

23 No camera.

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

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2 Q. Where is the second one?

3 A. I've got four.

4 Q. All right. Just tell me  
5 where they are.6 A. One is on my arm, one is on  
7 my right hip, one's on my upper bikini  
8 line on my right inner thigh, and I've  
9 got one on my left side on my rib  
10 cage.11 Q. Okay. Have you had them for  
12 a long time?13 A. I've had -- hang on. Two I  
14 have had for a long time.

15 Q. Which ones are they?

16 A. The scorpion on my right hip  
17 and my Leo symbol on my bikini line.18 Q. Have you ever obtained a  
19 college degree?

20 A. No.

21 Q. Have you ever gone back to  
22 college?23 A. I have tried to. I wanted  
24 to.

25 Q. When did you do that?

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2 A. When I moved to New York.

3 Q. In 2006?

4 A. Correct.

5 Q. Any other time?

6 A. Well, recent. I mean, I'm

7 going back to university next year, so

8 I'm currently relooking at colleges.

9 I'm going back to do my psychology

10 degree.

11 Q. Where?

12 A. I haven't decided yet

13 because I'm looking for an open degree

14 -- well, sorry, home learning, so I

15 haven't found somewhere yet. But I'm

16 currently going -- well, my aim is to

17 go back to university and get

18 qualified.

19 Q. Between 2006 and today, have

20 you applied to any other colleges?

21 A. No.

22 Oh, yes. Sorry, can you

23 repeat the question? Sorry.

24 MS. MENNINGER: He can read

25 it back.

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2 A. Yes. Yes.

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

5 A. It was 2006.

6 Q. Is that FIT?

7 A. That's correct.

8 Q. Anywhere else?

9 A. No.

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

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

20 Q. Did you have a modeling  
21 agent?

22 A. I did in Scotland.

23 Q. In college?

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

25 Q. Any other time?

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2 A. No.

3 Q. And what type of modeling

4 was that?

5 A. Just commercial.

6 Q. Print?

7 A. Yep.

8 Q. Runway?

9 A. Yep.

10 Q. TV or ads?

11 A. No.

12 Q. And all in Scotland?

13 A. No.

14 Q. Where else did you model?

15 A. New York.

16 Q. Anywhere else?

17 A. No.

18 Q. London?

19 A. Oh, yeah, I did, sorry. I

20 did do modeling, a bit of modeling in

21 London.

22 Q. All right. When did you do

23 modeling in New York?

24 A. During -- when I first

25 arrived in New York in 2006.

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

4 MR. GUIRGUIS: Objection.

5 A. I can't remember.

6 Q. When did you work in  
7 superyachting?8 A. I can't remember. About  
9 2011. About 2011.10 Q. And when did you work in  
11 hospitality?12 A. I've worked in hospitality  
13 my whole life. I've worked in -- I  
14 mean, hospitality, I've either done  
15 bar work, waitressing, superyachting,  
16 yeah.

17 Q. So on and off?

18 A. Yeah, on and off.

19 Q. And since you were an adult?

20 A. And since I was an adult, I  
21 worked in corporate jobs as well.22 Q. Where did you work in  
23 corporate jobs?

24 A. In South Africa.

25 Q. And just so I understand,

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1 HIGHLY CONFIDENTIAL AEO  
2 you lived in Scotland from the ages of  
3 14 to 22?

4 A. That's correct.

5 Q. And then where did you move?

6 A. To New York.

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

9 A. About seven, eight months.

10 Q. And where did you move?

11 A. Back in London.

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

14 A. Well, I lived in the UK.

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

19 Q. And then where did you move?

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

24 Q. Did you work for a company?

25 A. I worked for a private

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2 owner.

3 Q. On one yacht?

4 A. On multiple yachts.

5 Q. And what was your job?

6 A. Stewardess -- stewardess,

7 and then I was a deckhand.

8 Q. With wine?

9 A. Sorry?

10 Q. What's a decant?

11 A. A deckhand.

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

13 THE WITNESS: Sorry.

14 MS. MENNINGER: Oh,

15 deckhand. I thought you were

16 decanting wine. It's a pretty

17 good job.

18 Q. Who is the owner of the

19 ship?

20 A. I'm not allowed to specify.

21 Q. Do you have a

22 confidentiality agreement?

23 A. I did sign a confidentiality

24 agreement when I started employment.

25 Q. And how long were you

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2 employed in superyachting?

3 A. Two and a half years.

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

6 A. I moved back to Cape Town.

7 Q. So that was in 2014?

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

10 Q. Between 2014 and 2016?

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

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

15 A. No.

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

18 A. Myself.

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

21 A. Four years.

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

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

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2 December 2015.

3 Q. Where did you move?

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

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

8 A. Three months.

9 Q. And then where did you move?

10 A. Barcelona.

11 Q. So in March 2016?

12 A. Sorry, no, just hang on.

13 Sorry. I moved to Barcelona around  
14 June, June last year.

15 Q. 2016 June?

16 A. Yeah.

17 Q. You moved to Barcelona?

18 A. Yeah.

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

21 A. Correct.

22 Q. And who did you come with?

23 A. Myself.

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

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2 A. Myself.

3 Q. Why did you come?

4 A. I wanted to advance my  
5 career.

6 Q. What year?

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

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

11 A. No.

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

14 A. No.

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

17 A. No.

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

20 A. The Upper East Side.

21 Q. With whom?

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

24 Q. What was that person's name?

25 A. Chris.

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2 Q. How do you spell Chris?

3 A. C-H-R-I-S.

4 Q. And what's the last name of

5 Chris?

6 A. I can't remember.

7 Q. Male or female?

8 A. Male.

9 Q. How old?

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

11 Q. And how did you meet Chris?

12 A. I met Chris just via -- I

13 met him when -- why can't I remember?

14 I think, yeah, I was looking for an

15 apartment when I got here so it was

16 just a -- like, we just kind of met on

17 the Upper East Side and, yeah, I said

18 I was looking for somewhere to stay.

19 Q. Did you pay rent?

20 A. Yes.

21 Q. How much did you pay?

22 A. I can't remember.

23 Q. A thousand dollars?

24 MR. GUIRGUIS: Objection.

25 A. I think it was less than

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2 that.

3 Q. Did you have your own  
4 bedroom?

5 A. No.

6 Q. Was Chris the only other  
7 occupant?

8 A. There was another guy.

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

11 A. With Chris.

12 Q. Were you in a relationship  
13 with Chris?

14 A. No.

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

18 A. That's correct.

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

21 A. I can't remember.

22 Q. Do you have any way of  
23 reaching Chris now?

24 A. No, no, I don't.

25 Q. Do you know approximately

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1 HIGHLY CONFIDENTIAL AEO  
2 where in New York it was besides the  
3 Upper East Side?

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

7 Q. Any of the cross-streets?

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

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

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

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

21 A. It was an elevator building.

22 Q. Was there a doorman?

23 A. No.

24 Q. What floor were you on?

25 A. I can't remember.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And you don't remember how  
3 you met Chris?

4 MR. GUIRGUIS: Objection.

5 A. I met loads of people during  
6 that time. I can't specifically  
7 remember how I met every individual.8 Q. And in the same house, there  
9 was Chris and another guy?

10 A. That's correct.

11 MS. MCCAWLEY: Objection,  
12 misstates --13 Q. Do you remember the other  
14 guy's name?

15 A. I can't remember.

16 Q. How long did you live with  
17 Chris and the other guy?18 A. For a -- I think it was a  
19 couple months until I moved.

20 Q. And where did you move?

21 A. To Jeffrey Epstein's  
22 apartment.23 Q. What was the address to  
24 that?

25 A. I think it was 2000 -

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

4 Q. I'm sorry, what?

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

10 Q. Okay.

11 A. If I recall, yeah.

12 Q. So it's 205 East something?

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

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

20 A. No.

21 Q. Did you have your own  
22 apartment?

23 A. Yes.

24 Q. How big was the apartment?

25 A. It was massive.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. How many bedrooms did it  
3 have?4 A. I can't remember. I can't  
5 remember. I can't --

6 Q. Two or seven?

7 A. I just -- I remember just  
8 the -- like, the living room, and it  
9 was very spacious.10 Q. Can you draw a picture of  
11 the layout of it?12 A. I wouldn't remember the  
13 layout. There was -- I remember like  
14 a pale blue decor.15 Q. And no one else lived there  
16 with you?

17 A. No.

18 Q. And you don't know how many  
19 bedrooms?20 A. I can't remember how many  
21 bedrooms there were.

22 Q. Was there a doorman?

23 A. Oh, I can't remember.

24 Q. Was it a walkup or elevator?

25 A. Elevator.

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2 Q. What floor were you on?

3 A. I can't remember.

4 Q. Approximately when did you  
5 move into this apartment?6 A. It was not long after I  
7 moved in with Chris. About two  
8 months, I think. About two months, I  
9 think, roughly.10 Q. So you lived with Chris for  
11 about two months and then you moved  
12 into this other apartment?

13 A. That's correct.

14 Q. And how much were you paying  
15 for this new apartment?16 A. Oh, it was Jeffrey's. I  
17 didn't pay a single thing.18 Q. And who else lived in the  
19 apartment building?20 A. Quite a -- gosh. A few,  
21 actually. I recall Nadia.22 Q. Do you know Nadia's last  
23 name?24 A. I can't remember her last  
25 name, Nadia's last name.

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2 Q. Okay. Who else?

3 A. There were a few other

4 girls. I can't remember their names.

5 Q. None of them?

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

7 Q. What did they look like,

8 these other names you can't remember?

9 A. I can't remember. There

10 were so many. There were so many

11 girls, a constant influx of girls.

12 Q. How many?

13 MS. MCCAWLEY: Objection.

14 A. I can't remember.

15 Q. 50?

16 MR. GUIRGUIS: Objection.

17 A. I can't remember.

18 Q. A hundred?

19 MR. GUIRGUIS: Objection.

20 A. I can't remember.

21 Q. Can you say if it was more

22 than a thousand or less?

23 MR. GUIRGUIS: Objection.

24 A. I can't remember.

25 Q. You can't remember if it was

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2 more than a thousand?

3 A. I can't remember.

4 MR. GUIRGUIS: Objection.

5 MS. MCCAWLEY: Objection.

6 This is harassing.

7 MR. GUIRGUIS: Objection.

8 We're crossing a line here.

9 MS. MENNINGER: Okay. I'm  
10 asking if she can remember if it  
11 was more than a thousand or less.12 MS. MCCAWLEY: But you  
13 haven't defined it. You're not  
14 saying where. In the apartment?  
15 In general when she met with  
16 Jeffrey? I mean --17 MS. MENNINGER: I'm asking  
18 her -- she said there were so  
19 many women that were influx in  
20 the apartment, and I'm asking how  
21 many.22 MS. MCCAWLEY: She didn't  
23 say in the apartment. Go back  
24 and look at the testimony.

25 THE WITNESS: In the

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2 building.

3 Q. Right. In the building.

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

6 MR. GUIRGUIS: Objection.

7 A. I can't remember.

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

10 MR. GUIRGUIS: Objection.

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

13 Q. Was it less than a hundred?

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

16 Q. Was it less than 50?

17 A. I can't remember.

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

21 MR. GUIRGUIS: Objection.

22 A. I can't remember.

23 Q. Can you describe any of  
24 them?

25 MR. GUIRGUIS: Objection.

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2 A. I can't remember.

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

6 MR. GUIRGUIS: Objection.

7 A. I did freelance modeling.

8 Q. Who did you do that for?

9 A. Various photographers.

10 Q. Do you have those  
11 photographs still?

12 A. No.

13 Q. Do you have a portfolio?

14 A. I used to have one.

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

17 A. No.

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

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

22 A. Yeah, I got a couple.

23 Q. Where are they?

24 A. At home.

25 Q. In Barcelona?

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2 A. That's correct.

3 Q. Are they on a computer?

4 A. No.

5 Q. When you came to the U.S. in

6 the fall of 2006, was there a limit on

7 how long you could stay here?

8 MR. GUIRGUIS: Objection.

9 A. Yes, there was.

10 Q. What was that?

11 A. It was a three-month tourist

12 visa.

13 Q. Were you permitted to be

14 employed while you were here on a

15 tourist visa?

16 MR. GUIRGUIS: Objection.

17 Hold on a second.

18 MS. MENNINGER: I don't know

19 what kind of visa she was on.

20 I'm just asking the question.

21 MR. GUIRGUIS: I don't -- I

22 don't know why her visa status is

23 relevant or why we're going to

24 get into things that Mr. Trump

25 might be interested in, so I'm

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

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

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

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

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

20 A. No.

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

23 A. That's correct.

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

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

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

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

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

16 A. That's correct.

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

21 A. Yes, yeah.

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

25 A. I started looking at

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

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

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

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

18 A. I had some savings.

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

21 A. No.

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

25 A. I did the occasional, I

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

5 Q. What does that mean?

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

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

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

15 A. It was through an agency.

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

18 A. I can't remember.

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

21 A. No.

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

25 A. It depended how long the

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2 dinner was for.

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

6 A. \$1,500.

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

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

12 Q. What time period?

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

15 Q. Okay.

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

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

21 MS. MENNINGER: Sure.

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

23 (Recess.)

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

25 Q. Approximately how many times

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

6 A. I can't remember.

7 Q. Ten times?

8 MR. GUIRGUIS: Objection.

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

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

14 MR. GUIRGUIS: I'm sorry.

15 Off the record for a second.

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

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

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

22 A. Yes, I did, yes.

23 Q. What were the other sources?

24 A. Jeffrey Epstein.

25 Q. Any other source?

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2 A. No.

3 Q. Who introduced you to  
4 Jeffrey Epstein?

5 A. Natalya Malyshew.

6 Q. And how did you meet Natalya  
7 Malyshew?

8 A. I met her in a nightclub.

9 Q. Do you know which nightclub?

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

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

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

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

24 A. Socially.

25 Q. And were you with anyone?

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2 MR. GUIRGUIS: Objection.

3 A. I can't remember. I would  
4 have been with an acquaintance or  
5 something, but I can't remember who I  
6 was with.7 Q. Were you able to make some  
8 friends with people here in New York  
9 when you moved here?10 A. Yes. Natalya, Jennifer,  
11 [REDACTED], a girl named Pam. Pam.  
12 There were a few other -- I can't  
13 remember their -- they weren't close  
14 friends, they were just acquaintances.  
15 You don't really make friends in New  
16 York.17 Q. Tell me about your meeting  
18 of Natalya.19 A. She was a very attractive  
20 girl, Russian. I think Russian. Very  
21 friendly, very beautiful girl, very --  
22 we clicked immediately.23 Yeah. She approached me. I  
24 wasn't -- yeah, I didn't go out of my  
25 way to meet any friends in a

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2 nightclub, so -- especially girls.

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

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

9 Q. Where were you?

10 A. In the nightclub.

11 Q. Where in the nightclub?

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

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

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

18 Q. Was there a dance floor?

19 A. Yes, there was.

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

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

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

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

4 Q. Where did she kiss you?

5 A. On the mouth.

6 Q. Anywhere else?

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

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

11 A. The first time we met?

12 Q. Right.

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

18 Q. Okay. Was that consensual  
19 sex?

20 A. Yes, it was with Natalya,  
21 Natalya.

22 Q. And where did you have  
23 consensual sex with Natalya?

24 A. In the club the first time.

25 Q. Where in the club?

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2 A. In the owner's office.

3 Q. Was the owner present?

4 A. Yes, the owner was present.

5 Q. [REDACTED] ?

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

10 Q. Sure.

11 A. Grayish hair, dark eyes.

12 Looks a bit like the devil, got a  
13 little goatee. Got kind of like olivy  
14 skin. I've got a photo of myself and  
15 [REDACTED], so...16 Q. Okay. So you and Natalya  
17 and [REDACTED] had consensual sex in [REDACTED]'s  
18 office?

19 MR. GUIRGUIS: Objection.

20 MS. MCCAWLEY: Objection.

21 Q. Is that right?

22 A. That's correct.

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

25 MR. GUIRGUIS: Here's the

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2 question.

3 A. Yeah, that's correct.

4 Q. Was anyone else present?

5 A. No.

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

8 A. I did.

9 Q. How much?

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

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

15 A. No, I don't.

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

18 A. I don't remember.

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

21 A. Yes, I did.

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

24 A. From [REDACTED] and Natalya.

25 Q. Anywhere else?

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

5 Q. Anywhere else?

6 A. No.

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

9 A. No.

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

13 A. No.

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

16 A. I did.

17 Q. What did you take?

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

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

4 A. I can't remember her name.

5 Q. It was a woman?

6 A. It was a woman.

7 Q. And where was she located?

8 A. I can't -- I can't remember  
9 the exact location of her office.10 Q. Can you describe the office  
11 in any way?

12 A. I can't remember.

13 Q. Did anyone go with you?

14 A. No, I went on my own.

15 Q. Where did you go to get your  
16 prescriptions filled?17 A. A pharmacy near Jeffrey  
18 Epstein's apartment that I was living  
19 in at the time. I think it was a  
20 Duane Reade.

21 Q. Were they in your name?

22 A. Yes, they were.

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

25 A. Jeffrey first put me in

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

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

9 A. It was September 2006.

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

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

15 Q. Who paid for that?

16 A. I can't remember.

17 Q. Why did you go back?

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

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

22 A. I know I came in September.

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

25 A. And then I left the country

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

4 Q. When did you do that?

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

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

17 Q. Where did you go?

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

23 Q. Okay. So there's two trips  
24 to London we're talking about?

25 There's one you went and you came

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2 right back?

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

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

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

12 Q. How were you able do that?

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

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

17 A. No.

18 Q. Never?

19 A. No.

20 Q. Does your family travel?

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

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

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2 said, right?

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

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

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

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

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

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

23 Q. Okay.

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

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2 Q. They were what?

3 A. They weren't photo-happy,

4 so....

5 Q. So back in the fall 2006,

6 you were here for three months and

7 then you left --

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

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

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

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

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

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

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

10 A. Mm-hmm.

11 Q. So you left in December?

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

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

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

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

25 Q. From London?

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

8 A. Yeah, that's correct.  
9 Q. And the one to London, you  
10 recall being a brief trip to then  
11 allow you to stay in the country  
12 longer?

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

22 Q. Okay.

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

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

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

8 A. No.

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

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

17 Q. Were you living at Chris's?

18 A. Yes.

19 Q. Did you consider yourself in  
20 a relationship with Natalya?

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

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2 girl and was just very friendly,  
3 pretty.

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

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

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

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

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

15 A. No.

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

18 A. The girls told me.

19 Q. Who were the girls?

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

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

25 A. That's correct.

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2 Q. So what did you see Natalya  
3 do for Jeffrey?

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

7 Q. Did you see her do that?

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

11 Q. Got it.

12 So you were recruited by  
13 Natalya, correct? Yes or no.

14 A. Yes.

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

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

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

23 A. Different set of girls.

24 Q. Okay.

25 A. You know, there was a

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2 constant flow of women, girls.

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

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

15 Q. Getting back to Natalya, you  
16 met her at the nightclub?

17 A. Mm-hmm.

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

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

23 Q. Do you know where she lived?

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

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

4 A. No.

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

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

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

11 A. Yes, I did.

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

14 A. I don't remember.

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

17 A. No, I have no idea.

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

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

23 Q. Can you tell me about your  
24 first conversation with Natalya?

25 A. I can't remember my first

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2 conversation with her.

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

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

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

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

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

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

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2 them a lot, actually.

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

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

9 Q. Any other conversations with  
10 Natalya that you remember?

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

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

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

24 I often spoke to Natalya  
25 about why Ghislaine didn't like me and

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2 why the other girls didn't like me:  
3 Nadia didn't like me, Ghislaine didn't  
4 like me, Sarah Kellen definitely  
5 didn't like me. Yeah, that kind of  
6 stuff.

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

9 A. Through Natalya.

10 Q. Tell me about that.

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

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

25 Then we -- he was helping

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2 her at that time, as well as Jen and  
3 other girls.

4 Q. That's what she told you?

5 A. Yes.

6 Q. Where were you when Natalya  
7 was describing Jeffrey?

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

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

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

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

23 A. It was in person.

24 Q. Was anybody else there?

25 A. I think [REDACTED] could have been

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

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

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

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

17 MR. GUIRGUIS: Objection to  
18 form.

19 Q. What happened next?

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

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

24 Q. How?

25 A. We went to -- the first

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

5 Q. How did that meeting get  
6 arranged?

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

10 Q. And what movie did you see?

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

13 Q. Did you sit with him?

14 A. Yes, I did.

15 Q. Next to him?

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

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

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

24 Q. And where was the theater?

25 A. I can't remember the exact

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

7 I don't know. Sorry.

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

12 Q. It was somewhere in New  
13 York?

14 A. It was in New York.

15 Q. And you went with Natalya?

16 A. Yes.

17 Q. How did you go?

18 A. By cab.

19 Q. From your apartment with  
20 Chris?

21 A. Yes.

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

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

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

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

6 MR. GUIRGUIS: Objection.

7 A. No.

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

10 MR. GUIRGUIS: Objection.

11 A. I got in a taxi.

12 Q. And?

13 MR. GUIRGUIS: Objection.

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

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

19 A. I went home.

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

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

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

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

8 A. That's correct.

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

11 A. No, I can't remember.

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

15 A. Pretty soon after.

16 Q. What does that mean to you?

17 A. Couple days.

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

20 A. In New York.

21 Q. Where?

22 A. I can't remember.

23 Q. At his house?

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

25 Q. Was anyone else there the

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2 second time you met him?

3 A. Natalya.

4 Q. Anyone else?

5 A. No, not that I recall.

6 Q. Anything memorable about  
7 that event?

8 A. Nothing, nothing memorable.

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

11 A. No.

12 Q. At the first meeting?

13 A. No.

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

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

25 Q. And what did you do?

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2 MR. GUIRGUIS: Objection.

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

5 Q. Where was the plane located?

6 A. I can't remember the exact  
7 airport. I think it was either Newark  
8 or JFK.9 Q. Did you fly commercially or  
10 private?

11 A. Private.

12 Q. Was it Jeffrey's plane?

13 A. Yes.

14 Q. Who else was on the plane?

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

20 Q. Had you met Nadia before?

21 A. No.

22 Q. And you don't remember  
23 anyone else?24 A. No, it was -- I mean, there  
25 were always new people around Jeffrey

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

3 Q. Well, you just said and

4 Ghislaine. Was Ghislaine there?

5 A. No, not the first time.

6 Q. And do you recall what month

7 this was?

8 A. I can't remember what month

9 it was.

10 Q. It was sometime during your

11 first three-month period?

12 A. Yeah, it was within that

13 first three months.

14 Q. So sometime between

15 September and December?

16 A. That's correct.

17 Q. And did you have a camera

18 with you when you went?

19 A. I did.

20 Q. Did you take pictures?

21 A. I took a couple.

22 Q. Describe for me what

23 happened on the plane ride?

24 A. Nadia walked in, sat down in

25 front of me, Nataley. We all buckled

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2 up, we took off.

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

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

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

15 A. No, I didn't.

16 Q. Did anyone ask you to?

17 A. No.

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

21 A. No.

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

25 MS. MCCAWLEY: Objection.

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2 A. I can't remember.

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

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

11 Q. How long was the plane ride?

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

14 Q. Did you say anything?

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

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

21 I'm going to reach over?

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

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

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

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

10 Q. Can you just write Nadia  
11 next to that --

12 A. Okay.

13 Q. -- so I will remember later.

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

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

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

24 Q. Well, where was Natalya  
25 sitting?

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2 A. I don't remember where she  
3 was sitting.4 Q. Can you just put where the  
5 other seats were, if you don't  
6 remember who was in them?7 A. I remember there was seating  
8 here. I think there was -- I'm  
9 speculating here, but I can't remember  
10 if they were sitting on the -- on the  
11 other side of the plane. I can't -- I  
12 just remember that I sat on a seat in  
13 the front of the plane and there were  
14 people opposite me.15 Q. When you say opposite, do  
16 you mean in front and back of you or  
17 are you saying to your sides?

18 A. In front of me.

19 Q. Okay.

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

21 Q. Is it one seat in a row?

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

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2 on the back of the plane --

3 Q. Okay.

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

8 Q. Okay.

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

11 Q. I understand.

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

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

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

24 Q. Were there bathrooms on the  
25 plane?

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2 A. Yes.

3 Q. Where were they?

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

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

9 A. It was a nice, big plane.

10 Yeah, it was a plane. A plane.

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

13 A. No.

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

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

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

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

22 THE WITNESS: It's really  
23 bad. Do you want me to redraw  
24 that? It's really embarrassing.

25 I'm not an artist or anything.

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2 It's really bad.

3 MR. GUIRGUIS: Just hand it  
4 over.5 (Defendant's Exhibit 1,  
6 hand-drawn picture marked for  
7 identification.)8 Q. Was there a kitchen on the  
9 plane that you recall?

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

11 Q. Was there an office area?

12 A. I can't remember the layout  
13 of the plane. I remember the bed.  
14 The only thing I remember is the  
15 open-plan bed where I watched Nadia  
16 and Jeffrey have sex.17 Q. Apart from the Louis Vuitton  
18 bag, do you remember what Nadia was  
19 wearing?20 A. I just remember she had a  
21 black Louis Vuitton handbag. And I  
22 don't remember what she was wearing,  
23 no. But I remember the black handbag  
24 because I liked it so much, I bought  
25 the red-colored version a few years

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2 later. It was really nice.

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

5 A. A few days.

6 Q. Was it a week or two days?

7 A. I can't remember.

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

12 MR. GUIRGUIS: Objection.

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

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

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

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2 Q. Any other guests?

3 A. No, not that first trip.

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

7 A. Yes.

8 Q. What happened?

9 MR. GUIRGUIS: Objection.

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

12 Q. And how did that come about?

13 A. So the entire basics were  
14 explained to me, there's this wealthy  
15 dude, this philanthropist, loves  
16 women, loves getting massages. And  
17 this was a nice way to make extra  
18 cash, which is great.19 I got to the island -- oh, I  
20 was made to massage Jeffrey on the  
21 plane. Sorry. That's where I gave my  
22 first massage to Jeffrey.23 So my first massage started  
24 with him on the plane, with his feet  
25 and his hands. And on that trip I

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

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

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

13 A. Yes.

14 Q. That was not sexual?

15 A. That was not sexual, no.

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

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

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

24 A. On the island or --

25 Q. No, on the plane. Just on

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2 the plane.

3 A. Jeffrey asked me to massage  
4 him.5 Q. So you were asleep and  
6 Jeffrey woke you up?

7 MS. MCCAWLEY: Objection.

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

16 Q. Okay.

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

20 Q. You were rear-facing?

21 A. Yeah.

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

25 A. Yeah. We switched seats a

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2 few times.

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

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

8 Q. In front of where you were?

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

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

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

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2 speculating.

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

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

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

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

16 Q. Was he wearing clothes?

17 A. Yes.

18 Q. During the whole massage?

19 A. During the whole massage,  
20 yes.

21 Q. What was he wearing?

22 A. I don't remember.

23 Q. Did he have on shoes?

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

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2 took his shoes off to have the  
3 massage.

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

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

9 Q. Were you surprised by that  
10 request?

11 A. No.

12 Q. Why not?

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

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

18 A. No.

19 Q. Did you expect him to?

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

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2 It's not very businesslike.

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

5 A. Yes.

6 Q. Where was the second  
7 massage?

8 A. On his island.

9 Q. Where on the island?

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

16 Q. Who asked you to do that?

17 A. Sarah Kellen.

18 Q. So Sarah Kellen was on the  
19 island?

20 A. Yes.

21 Q. Did she travel with you?

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

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

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

9 A. Several.

10 Q. How many?

11 A. Several. Several times.

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

14 Q. Three times?

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

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

19 A. Yeah.

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

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

25 Q. Do you know how many times

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1 HIGHLY CONFIDENTIAL AEO  
2 you went on the private plane versus a  
3 commercial plane?

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

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

13 MR. GUIRGUIS: Objection.

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

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

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

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

25 A. Jeffrey's speedboat.

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2 Q. Was that the only method?

3 A. Also a helicopter.

4 Q. Who flew the helicopter?

5 A. I don't -- a guy.

6 Q. Was he cute?

7 MR. GUIRGUIS: Objection.

8 A. I don't remember.

9 MR. GUIRGUIS: Objection,  
10 and I direct the witness not to  
11 answer.

12 MS. MENNINGER: I'm learning  
13 about superyachting. I thought I  
14 would find out about the  
15 helicopter.

16 MR. GUIRGUIS: I thought you  
17 were going to ask if he was  
18 taller than 6 feet or less than 6  
19 feet. I thought that was the  
20 next series of questions.

21 Q. So you said the second  
22 massage you gave Jeffrey was on the  
23 island the same day you flew down  
24 there the first time?

25 A. Yes.

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2 Q. And it was in the open-plan  
3 area?

4 A. Yes.

5 Q. And you recall Sarah Kellen  
6 being the one to ask you to give the  
7 message?8 A. We were all sitting there  
9 socially. Jeffrey asked me. And that  
10 wasn't a sexual massage in the seating  
11 area on the island, the second  
12 massage. He was still training me to  
13 massage, so my standards weren't quite  
14 high enough.15 Q. How did he train you to  
16 massage him?17 A. He let the girls massage me  
18 in front of him. He showed me how  
19 to -- because his body's full of  
20 knots, so -- and he likes his massage  
21 really hard. So when you really push  
22 on those knots that he has, you have  
23 to be quite firm with him.24 Q. So he told you what he  
25 liked?

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2 A. Yes, yeah. And some of the  
3 other girls -- sorry. Natalya showed  
4 me how he like his massages.

5 Q. Was he clothed during the  
6 second massage?

7 A. Yes.

8 Q. Were you clothed?

9 A. Yes.

10 Q. Did any sexual contact occur  
11 on the second massage?

12 A. No.

13 Q. When do you recall there  
14 being a third massage?

15 A. The next day.

16 Q. And what happened that gave  
17 rise to the third massage?

18 A. I was called to Jeffrey's  
19 bedroom to massage him.

20 Q. Who called you?

21 A. I'm -- I don't want to  
22 speculate, so I can't remember  
23 specifically who called me.

24 Q. Okay. So some third person  
25 you don't recall --

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2 A. It was a female. It was  
3 either Sarah Kellen or Natalya, so I  
4 can't remember which of the two that  
5 called me, because they called me many  
6 times during the duration of my trip.

7 Q. So when you say called me,  
8 what does that mean?

9 A. They come up to me and say,  
10 please go to Jeffrey's bedroom and  
11 massage Jeffrey. He is waiting for  
12 you.

13 Q. What time of day was it?

14 A. I think it was -- I can't  
15 remember what specific time of day it  
16 was.

17 Q. Can you kind of describe the  
18 island for me. Were there more than  
19 one building on it?

20 A. Yeah, there were multiple  
21 buildings. You had the main house.  
22 You had certain accommodation areas  
23 where the girls sit.

24 There were various buildings  
25 around the island where he used to

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1 HIGHLY CONFIDENTIAL AEO  
2 have all -- him and his other guests,  
3 like beds and beds, like little  
4 shelter things where him and his  
5 guests used to have sex with the  
6 girls, like beds set up for instant  
7 sexual entertainment. So --

8 Q. On a beach area?

9 A. All over the island. All  
10 over the island. So if you go on one  
11 of his quad bikes and do a tour of his  
12 island, which I'm sure you guys have  
13 done, you will see multiple buildings  
14 around the island.

15 Q. And where were you staying  
16 during this first trip?

17 A. I was staying in one of the  
18 guest houses that Natalya -- the main  
19 guest house that all the girls shared.

20 Q. Were you staying in your own  
21 room?

22 A. No.

23 Q. Who were you sharing a room  
24 with?

25 A. Natalya. I think Nadia

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2 slept in the bungalow; she didn't stay  
3 there per se. She was explained to be  
4 Jeffrey Epstein's girlfriend at the  
5 time.

6 Q. When you were asked to give  
7 Jeffrey a massage on the third  
8 occasion by a female, do you recall  
9 what words were used?

10 A. I can't remember the exact  
11 words, no. But I was -- it was  
12 generally -- it was, can you please go  
13 and give Jeffrey -- it's kind of like  
14 your turn type of thing.

15 Q. Did you know where his  
16 bedroom was?

17 A. I was shown to his bedroom.

18 Q. Who showed you to his  
19 bedroom?

20 A. I can't remember who showed  
21 me to his bedroom.

22 Q. All right. Tell me what  
23 happened during the third massage?

24 A. So I went into Jeffrey  
25 Epstein's bedroom. His bedroom is

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2 ice-cold; it's always ice-cold. He  
3 likes his bedrooms very well air  
4 conditioned.

5 There was a massage table  
6 laid out in his bedroom. He asked me  
7 to undress and that he wanted to give  
8 me a massage, and he asked me to lay  
9 on the table. He then started  
10 touching my body.

11 I was -- I was -- it didn't  
12 start off as a sexual massage; it was  
13 just -- you know, it was just doing a  
14 normal massage, and then he started to  
15 touch me. He touched my vaginal  
16 region and he touched me all over.

17 Q. Were you draped with a  
18 towel?

19 A. No.

20 Q. For no part of the massage?

21 A. For the -- I can't remember.

22 Q. Was anyone else present in  
23 the room?

24 A. No.

25 Q. And after he started

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2 touching you while you were on the  
3 table, did you give him a massage?  
4 A. I can't remember the  
5 specific sequence of events, but I  
6 remember the third massage, it wasn't  
7 for Jeffrey; it was for me. He  
8 performed the massage on me.

9 Q. Did you tell him to stop?  
10 A. No, I didn't.

11 Q. Did you have any sexual  
12 contact with him?

13 A. No, he just touched me. And  
14 he was touching himself too, so...

15 Q. Did you have an orgasm?

16 A. I did have an orgasm. He  
17 used a specific vibrator on me, which  
18 it was quite hard not to.

19 Q. Can you describe it?

20 A. Yeah. It's quite big. It's  
21 not an actual vibrator. It's really  
22 good; you should get one if you don't.

23 THE WITNESS: Sorry. I'm  
24 allowed to talk. Okay. Sorry.

25 A. It's -- I'll -- can I draw

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2 it? Can I draw it? I'll draw you the  
3 exact -- I can actually get you -- I  
4 actually own one, so I can get you a  
5 photo of it, you know. It's also in  
6 the pictures in the dentist chair, in  
7 one of the photos, so...

8 It's like this.

9 THE WITNESS: I'm sorry.

10 MR. GUIRGUIS: You're fine.

11 MS. MCCAWLEY: You're fine.

12 A. So it's actually a massager  
13 for shoulders. It's got a long base.  
14 It's got quite a -- it's got like a  
15 rubber white head.

16 And, yeah, it was really --  
17 it's not -- it's not used for sexual  
18 purposes.

19 Q. It's not?

20 A. No, that's what I'm saying.

21 It's not a vibrator.

22 Q. Okay.

23 A. It was actually quite  
24 painful for me --

25 Q. Okay.

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2 A. -- actually.

3 Q. Okay. Did you tell him to  
4 stop?

5 A. I told him to stop when  
6 he -- because he pressed the vibrator  
7 head on my clitoris and it was  
8 incredibly painful. It hurt me.  
9 That's a very sensitive area, and the  
10 strength of this specific device he  
11 used is -- it's not really meant for  
12 that.

13 Q. Right. Did he stop when you  
14 said stop?

15 A. No.

16 Q. And how long did this  
17 massage --

18 A. Until -- until I orgasmed.

19 Q. And then what happened?

20 A. He just stopped. And I got  
21 dressed and I left.

22 Q. Was there any discussion?

23 A. No.

24 Q. Did he give you any money?

25 A. No.

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2  
3 MR. GUIRGUIS: Can we stop  
4 for a moment? The witness is  
5 crying. I think maybe we should  
6 take a moment, have a moment.

7 MS. MENNINGER: Okay. Mark  
8 that as Defendant's Exhibit 2,  
9 and then we'll take a break for  
ten minutes.

10 (Defendant's Exhibit 2,  
11 hand-drawn picture, was marked  
12 for identification.)

13 (Time noted: 12:07 p.m.)

14 (Recess.)

15 (Time noted: 12:19 p.m.)

16 Q. So you just described for  
17 us, I think, what you recall being the  
18 third massage with Jeffrey?

19 A. Yeah.

20 Q. Do you recall the next one  
21 after that?

22 A. It was -- it was basically  
23 the same. I was called to give  
24 Jeffrey massages.

25 Q. During that first trip to

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2 the island?

3 A. During the first trip, yeah.

4 Q. Can you approximate how many  
5 massages you gave to him during that  
6 first trip?

7 A. I would give him up to maybe  
8 two a day. The other girls, they had  
9 to also give him massages during that  
10 trip.

11 Q. And you don't remember how  
12 many days that trip was?

13 A. No, not specifically how  
14 many. It was a few days. It was a  
15 few days.

16 Q. At some point did the  
17 massages become different than the one  
18 you just described as the third  
19 massage?

20 A. It was either Jeffrey lying  
21 on the massage -- me massaging him and  
22 it turning sexual or vice versa.  
23 Pretty much from the third sexual  
24 massage I had with Jeffrey, all other  
25 massages were sexual.

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2 Q. Do you recall who was on the  
3 flight home from the first trip?4 A. I don't recall who was on  
5 the flight home. I think it was all  
6 the people that were on the first  
7 flight there.8 Q. Did you receive any  
9 compensation from Jeffrey during that  
10 first trip?11 A. I received like \$300 or  
12 something. Not a lot.

13 Q. When did you get that?

14 A. At the end of the trip.

15 Q. How was it given to you?

16 A. In cash.

17 Q. By whom?

18 A. That specific time it was  
19 Jeffrey.20 Q. Where were you when he gave  
21 that you money?22 A. I can't recall where I was  
23 when he gave me the cash.24 Q. Did -- were you still with  
25 the other females that had been on the

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2 plane?

3 A. When he gave me the cash?

4 Q. Yes.

5 A. I can't recall. I don't  
6 remember if someone was with me. But  
7 we all knew that we were going to get  
8 cash.9 Q. Did you see him give cash to  
10 anyone else?11 A. I saw him give cash to  
12 Natalya.13 Q. How much did he give her, if  
14 you know?

15 A. I don't know.

16 Q. Did you see Natalya having  
17 any type of sexual relations with  
18 Jeffrey during the trip?

19 A. Yes, I did.

20 Q. When did you see that?

21 A. I didn't see it in the  
22 bedroom, but we were called on, like,  
23 a rotation visit for Jeffrey  
24 throughout the day and evening.

25 Q. When did you see Natalya

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2 having some type of sexual  
3 relationship with Jeffrey on the  
4 island during the first trip?

5 A. I didn't see her perform  
6 sexual acts on Jeffrey.

7 Q. Did anyone see you  
8 performing sexual acts on Jeffrey  
9 during the first trip to the island?

10 A. No.

11 Q. Did you tell any of these  
12 other women about what was going on  
13 during your massages with Jeffrey?

14 A. Yes.

15 Q. Who did you tell?

16 A. All the girls that were  
17 there.

18 Q. And, again, that is Natalya,  
19 Nadia and Jen?

20 MR. GUIRGUIS: Objection.

21 Q. Do you remember?

22 A. I can't say specifically if  
23 Jen was there. I can't remember Jen  
24 being there, so I don't like to bring  
25 Jen into the first trip.

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2 I saw her multiple times on  
3 the island, but I can't specifically  
4 place her there on the first trip. I  
5 just remember the key people that were  
6 there because they were the most vivid  
7 in my memory.

8 Q. Do you know if you took any  
9 pictures during that first trip?

10 A. I don't think during that  
11 first trip, no. We weren't actually  
12 allowed to bring any electronic  
13 devices with us.

14 Q. How did you learn that rule?

15 A. Natalya told me and the  
16 other girls told me.

17 Q. Who are the other girls?

18 A. Jen.

19 Q. Did you take a camera to the  
20 island?

21 A. Not the first time, no.

22 Q. Did you have a digital  
23 camera at the time?

24 A. Yes, I did.

25 Q. What kind?

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2 A. I can't remember.

3 Q. Did you have a phone with a  
4 camera on it?

5 A. I had a BlackBerry, yes,  
6 which you could take photos on.

7 Q. All right. Do you recall  
8 there being any sexual acts performed  
9 on the plane on the ride home during  
10 the first trip?

11 A. No.

12 Q. Okay. Do you recall going  
13 down a second time?

14 A. To the island?

15 Q. Yes.

16 A. Yes.

17 Q. When did that happen?

18 A. Shortly. I can't remember  
19 specifically when it was, but it  
20 wasn't on -- I don't know the time  
21 length. I saw Jeffrey and Ghislaine  
22 and the crowd quite a lot in New York  
23 as well, so it's not clear to me when  
24 the second trip was.

25 Q. When was the first time you

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2 met Ghislaine?

3 A. I'd been to the island a  
4 couple times before, and then I met  
5 Ghislaine on the island.

6 Q. Tell me about your meeting  
7 with her?

8 A. I remember being told by  
9 everyone before she arrived who she  
10 was. And I was pretty much told the  
11 type of person she was and that I had  
12 to do everything she told me to do.

13 Q. Who told that you?

14 A. Nadia, Sarah Kellen,  
15 Natalya, Jen. Every single girl that  
16 I came in communication with told me  
17 that.

18 Q. And what type of person did  
19 they tell you that she was?

20 A. She's incredibly  
21 intimidating. She's not someone you  
22 want to be stuck in an alley at night,  
23 put it that way. She's a very  
24 dangerous character and has  
25 connections.

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2 Q. And that was communicated to  
3 you by this group of females: Nadia,  
4 Sarah, Natalya and Jen?

5 A. Yes.

6 Q. Anyone else?

7 A. I mean, it was a general  
8 conversation amongst the girls about  
9 Ghislaine, so there were other girls  
10 all the time. So during the duration  
11 of my stay -- so pretty much from  
12 my -- when I first arrived in New  
13 York, my entire time was spent with  
14 Jeffrey and Ghislaine and that crowd.

15 So, yeah, it was -- that's  
16 about everything.

17 Q. Okay. So you met --

18 A. I met a lot of girls who we  
19 all had the same opinion of Ghislaine;  
20 we were all frightened of her. She  
21 had a very odd relationship with  
22 Jeffrey and -- yeah, she's not a  
23 nice -- I'm sorry, I know she's your  
24 client, but she's not -- she's not a  
25 friendly, warm person.

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2 I liked her dog, though, her  
3 Yorkshire Terrier. Her dog was nice.4 Q. You recall meeting her for  
5 the first time on the island?6 A. Yeah. She flew in by  
7 helicopter.8 Q. And that was after you were  
9 on the island a couple of times?

10 A. Yeah.

11 Q. Did she fly the helicopter?

12 A. I can't remember if she flew  
13 it or not. I just remember her  
14 getting out -- like getting out of  
15 a -- and going Ghislaine, and I was  
16 like -- I was quite frightened when  
17 she arrived, so...18 Q. Was she alone or with  
19 someone?20 A. I can't remember if she was  
21 with someone. I just remember the  
22 first time I saw her, I was like, is  
23 that it? She didn't look that scary  
24 when I first met her. Looks are  
25 deceiving.

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2 Q. So the first time you saw  
3 her, she was getting off of a  
4 helicopter?

5 A. Yeah.

6 Q. And you don't recall if she  
7 flew the helicopter?

8 A. I don't recall if she flew  
9 it herself or if there was a pilot  
10 there. I just remember she arrived on  
11 a helicopter.

12 Q. What's the next thing you  
13 remember about your interactions with  
14 her personally?

15 A. She stayed on the island a  
16 few days, and I didn't have a lot of  
17 interaction with her. I avoided her,  
18 to be honest.

19 Q. Did you take pictures of  
20 her?

21 A. No. We weren't allowed any  
22 digital cameras on the island.

23 Q. Have you ever taken a  
24 picture of her?

25 A. No. I didn't really feel

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2 the need to take pictures of Ghislaine  
3 for my photo album.

4 Q. Apart from staying away from  
5 her and not having a lot of  
6 interactions, do you recall anything  
7 else about your first interaction with  
8 her on the island?

9 A. Yeah. She was incredibly  
10 unpleasant to me. She wasn't friendly  
11 or warm.

12 Q. What did she say or do?

13 A. She was very dismissive.  
14 Just another girl, really.

15 Q. Did you ever give her a  
16 massage?

17 A. No.

18 Q. Did she ever give you a  
19 massage?

20 A. She massaged me once or  
21 twice, but it was to -- it was to  
22 refine my technique for Jeffrey.

23 Q. This was on the first time  
24 you met her?

25 A. Yeah, during that trip

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2 she -- because Jeffrey, again, he's  
3 quite specific on how he likes his  
4 massages and, yeah, I'm not -- that's  
5 not my forte, massages.

6 Q. How did it come about that  
7 she was helping you to refine your  
8 massage techniques?

9 A. We were just sitting in the  
10 main area by the big house. That's  
11 where we chilled out. There's a table  
12 there as well.

13 And, yeah, we were just  
14 sitting on the sofas, and I think -- I  
15 can't remember if I was giving Jeffrey  
16 a massage, but we were all sitting  
17 together, and I think he was getting  
18 massaged by one girl and we were kind  
19 of taking it in turns.

20 Q. Was it sexual?

21 A. No, it wasn't sexual. But  
22 Ghislaine was there, and I wasn't  
23 doing it properly and she showed me  
24 how to massage him and how he liked  
25 it.

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2 Q. What part of his body did  
3 she show you how to massage?

4 A. His feet, his hands.

5 Q. Did she say anything to you?

6 A. I can't remember  
7 specifically what she said to me. She  
8 said a lot of things to me.9 Q. Okay. Well, tell me what  
10 you remember she said to you.

11 MR. GUIRGUIS: Objection.

12 When? Where? What? What are we  
13 talking about?14 A. I can't remember  
15 specifically what she said to me. All  
16 I know is that she wasn't -- she  
17 wasn't a particularly nice person, to  
18 me or anybody. So very dictorial  
19 [sic].20 Q. Unlimited by time or  
21 anything, do you recall anything  
22 Ghislaine said to you?

23 MR. GUIRGUIS: Objection.

24 You're asking her --

25 A. It was how to massage

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2 Jeffrey.

3 I remember speaking to her  
4 quite a lot about my FIT application.

5 I remember speaking to  
6 Ghislaine about my psychiatrist, about  
7 my weight. My weight was a big issue.  
8 And, in fact, everything was an issue  
9 with Ghislaine.

10 Q. During this first time you  
11 met her, other than discussing  
12 massages, did those other topics come  
13 up?

14 A. I can't remember the first  
15 encounter with Ghislaine, but it was  
16 pretty soon after. Everything  
17 snowballed quite quickly.

18 Q. Well, you saw her getting  
19 off the helicopter, correct?

20 A. Yeah.

21 Q. And you saw her on the  
22 island for a couple days that time,  
23 you said, correct?

24 A. Yeah.

25 Q. So during that time you saw

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2 her over a couple days, do you  
3 remember any other discussions you had  
4 with her apart from this massage?

5 A. We spoke about why I was  
6 there, New York. I mean, we -- you  
7 know, she got to know me. She asked  
8 me a lot of questions about my family  
9 life, my -- I mean, she questioned me  
10 a lot on my personal life.

11 Q. Was anyone else present when  
12 you were having these discussions with  
13 Ghislaine?

14 A. Yes, everyone. Everyone  
15 that was -- Sarah Kellen, Jeffrey,  
16 Natalya.

17 Q. Was there anyone different  
18 on this trip?

19 A. Nadia as well. Nadia was  
20 there.

21 Q. Anyone else on this trip?

22 A. I can't remember.

23 Q. Was Jean Luc Brunel there?

24 A. Not the first time I met  
25 Ghislaine.

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2 Q. Was anyone else there?

3 A. I can't remember.

4 Q. Anything that would refresh  
5 your memory?

6 A. If you could give me the  
7 plane logs or something, or names or  
8 photos. Ten years, as I said, is an  
9 incredibly long time. I don't  
10 remember who -- I mean, it was such a  
11 long time for me.

12 I came to New York, my  
13 intention was to meet many people,  
14 make new friends, make a new life for  
15 myself. So I didn't really -- I don't  
16 remember names specifically.

17 Q. Do you remember any  
18 descriptions of other people who were  
19 on the island the first time you met  
20 Ghislaine?

21 A. They were all beautiful  
22 people. I just remember being  
23 surrounded by beautiful young people.  
24 They were always girls. There were  
25 always girls. You know, girls didn't

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2 even have time to kind of remember  
3 girls' names because there was always  
4 people leaving the island, popping in,  
5 flying in. So there was a constant  
6 flux of people coming in, popping in  
7 visiting Jeffrey and Ghislaine.

8 Q. So the first time you met  
9 Ghislaine, you saw her get off a  
10 helicopter. She was on the island for  
11 a couple days.

12 Any other females you  
13 remember being there on that occasion?

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

16 A. Sarah Kellen, Nadia,  
17 Natalya, and I can't remember any  
18 others.

19 Q. Can you remember any  
20 descriptions of other people who were  
21 there on that occasion?

22 MR. GUIRGUIS: Objection,  
23 asked and answered.

24 A. They were just pretty. They  
25 were just beautiful.

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2 Q. Hair color?

3 MR. GUIRGUIS: Objection.

4 A. Normal.

5 Q. Height?

6 A. I don't recall height.

7 Q. Any other physical  
8 characteristics at all?

9 MR. GUIRGUIS: Objection.

10 A. Just that they were  
11 extremely beautiful. I've never seen  
12 girls like this.

13 Q. Well, you had been a model  
14 in London, right?

15 A. Yeah, I have, but, you know,  
16 Jeffrey Epstein, he acquired the  
17 elite, didn't he, you know, him and  
18 Ghislaine. So they were pretty much  
19 the crème de la crème of the crop, I  
20 would say, the girls that were around  
21 him.

22 Q. On this first occasion when  
23 you met Ghislaine and there were  
24 beautiful girls, who you don't recall  
25 what they look like; you recall they

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2 were beautiful?

3 A. Yeah, there were beautiful  
4 people constantly surrounded by  
5 Jeffrey Epstein and Ghislaine. They  
6 were only surrounded by beautiful  
7 people, beautiful girls.

8 Q. But apart from that, you  
9 don't have any other specifics?

10 A. I don't recall the  
11 appearance of the other girls. I  
12 don't -- as I will say again, there  
13 was a constant stream of people coming  
14 in, going off the island, popping in,  
15 popping out, girls flying in, girls  
16 flying out. There were girls on the  
17 island that were there shorter time  
18 frames than me and flew out.

19 I didn't really -- I hung  
20 out with my crew: Natalya, Jen. They  
21 were -- they were my friends. I  
22 thought they were my friends. So I  
23 didn't really cozy up to any of the  
24 other girls.

25 It's like high school, you

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2 know, you're not friends with  
3 everybody. You ask me who -- everyone  
4 I went to school with, I don't  
5 remember. I don't have a clue. I  
6 don't know who they are.

7 Q. Do you have a best friend  
8 from school?

9 MR. GUIRGUIS: Objection.

10 A. Several. Several. I mean,  
11 who has any best friend at school?  
12 School's school. We don't make best  
13 friends at school.

14 Q. Who is Pumla?

15 A. She was an acquaintance that  
16 I met in New York.

17 Q. Where did you meet her?

18 A. I think I met her at a bar  
19 or something.

20 Q. Was she a friend of yours  
21 during this time period?

22 A. She was an acquaintance. I  
23 would say friend is -- yeah, I  
24 wouldn't say friend. I'd say  
25 acquaintance.

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2 Q. So on this occasion where  
3 you met Ghislaine on the island and  
4 you spoke to her about massage, did  
5 you ever have any other sexual-type  
6 interactions with her?

7 MS. MCCAWLEY: I didn't hear  
8 the end of that. Did you say  
9 "him"?

10 Q. Sexual-type interactions  
11 with her?

12 A. With her?

13 Q. Ghislaine?

14 A. No.

15 Q. And do you recall if she  
16 flew with you back on the plane?

17 A. I can't remember.

18 Q. What's the next time you  
19 went to the island?

20 A. Again, I don't remember  
21 specifically. I went various several  
22 times during the duration. So I  
23 remember there was a -- it was several  
24 times. I can't remember the next time  
25 I went to the island. I mean, it's...

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2 Q. Was it before you went back  
3 to South Africa to visit?

4 A. Yes.

5 Q. All the visits to the island  
6 were before that?

7 MS. MCCAWLEY: Objection.

8 A. Yeah.

9 Q. What's the next time you  
10 remember meeting Ghislaine?

11 A. I met her at the office in  
12 New York.

13 Q. What's the office?

14 A. Jeffrey's office, main  
15 office.

16 Q. Where is that?

17 A. I don't remember the  
18 location. It's central. It's got a  
19 courtyard. Like when you walk in,  
20 there's like a courtyard.

21 Q. What were you doing at  
22 Jeffrey's office in New York?

23 A. We were preparing for my  
24 college application. Jeffrey often  
25 wanted to see just how I was doing, so

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2 I had to regularly pop in to see him  
3 and Ghislaine. And Ghislaine would  
4 often check how I was doing and blah,  
5 blah, blah, etcetera.

6 Q. What were you doing to  
7 prepare for your college application?

8 A. I had to write an essay.

9 Q. When did you --

10 A. Also, I had to do -- like,  
11 you know how you apply for college  
12 applications; you've got your  
13 application forms and such. So it was  
14 more admin.

15 Q. And you were going to  
16 Jeffrey's office to work on your  
17 forms?

18 A. Yes. And to just say hi. I  
19 was -- well, I never went on my own  
20 accord. I was either invited or told  
21 to be there by either Ghislaine or  
22 Jeffrey. I also went to the offices  
23 on a number of occasions for private  
24 legal matter.

25 Q. What's the private legal

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2 matter?

3 MR. GUIRGUIS: Objection.

4 I'm going to direct you not to  
5 answer if it's unrelated to this  
6 case.

7 Q. Was there an attorney  
8 present?

9 A. Yes.

10 Q. What was the name of the  
11 attorney who was present?

12 A. Alan Dershowitz.

13 Q. So I was asking about the  
14 second time you met Ghislaine. It was  
15 at Jeffrey's office in New York?

16 A. Yes.

17 Q. How did you come to be in  
18 Jeffrey's office in New York where you  
19 met Ghislaine the second time?

20 A. I was told to be there.

21 Q. Who told you to be there?

22 A. I think it was Ghislaine.

23 Q. How did Ghislaine tell you  
24 to be there?

25 A. I can't remember if it was

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2 via telephone call. I can't remember  
3 the exact communication that she used.  
4 But I was told to regularly be there  
5 when they wanted me there, and just  
6 grabbed a taxi and arrived at the  
7 office.

8 Q. Well, I'm asking you about  
9 the second time.

10 So you met her on the  
11 island, and the next thing you know,  
12 you have a communication from her in  
13 New York?

14 A. Well, she was always with  
15 Jeffrey in his office, so it's like --  
16 okay, so let me explain it.

17 So you go to an office and  
18 you see Jeffrey's office there and  
19 Ghislaine -- Ghislaine was always at  
20 Jeffrey's office, so I think she had  
21 her own office there.

22 So when you walk in and  
23 you've met people before, you kind of  
24 say hi to everyone. You know, you  
25 have a little chitchat.

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2 Do you understand? You  
3 don't -- you don't -- you know, I  
4 chatted with Ghislaine, I chatted with  
5 Jeffrey. It was a busy office. I  
6 can't remember specifically what was  
7 said. It was just a check-in, kind  
8 of.

9 Q. So you were going there to  
10 work on your college application, and  
11 you happened to see Ghislaine in the  
12 offices?

13 MS. MCCAWLEY: Objection.

14 A. She -- you know, she  
15 participated in the -- you know, a  
16 lot. She was interested in me. I  
17 was -- you know, she interacted with  
18 me.

19 Q. I know. I'm trying to  
20 understand when you did this. When  
21 was it?

22 A. It was the second time, the  
23 first time I went to the office.

24 Q. The first time you went to  
25 the office, the second time you met

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2 Ghislaine?

3 A. Yes.

4 Q. And when was it relative to  
5 the first time you met Ghislaine?

6 A. I can't remember if it was a  
7 couple of weeks later. I don't  
8 remember the exact time frame of how  
9 many days or weeks there was between  
10 the first trip and the -- when I went  
11 in to the office.

12 Q. But you do recall going into  
13 the office to work on your college  
14 application?

15 MS. MCCAWLEY: Objection.

16 A. Yes. Well, I went in a  
17 number of times to the office. So,  
18 like, we regularly had to report to  
19 Jeffrey in the office. It was a -- we  
20 were called all the time there.

21 Q. What do you mean, you had to  
22 report there?

23 A. Well, Jeffrey liked to check  
24 in with all of us.

25 Q. How was it communicated to

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2 you that you needed to report to the  
3 office?

4 A. Jeffrey. I was just told to  
5 be there; I had to be there.

6 Q. Who told that you?

7 A. Jeffrey and Ghislaine.

8 Q. Anyone else?

9 A. Sarah Kellen and Lesley  
10 Groff.

11 Q. How did they communicate it  
12 to you?

13 A. By telephonic call.

14 Q. To your cell phone?

15 A. And BlackBerry, which they  
16 provided me.

17 Q. So you did not have a  
18 BlackBerry before you met Jeffrey?

19 A. No.

20 Q. Then you got a BlackBerry  
21 when you were --

22 A. That's correct.

23 Q. -- acquainted with him.

24 And what happened with the  
25 phone you had before?

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2 A. It's got lost through  
3 translation. I have moved several  
4 times through the years, so...

5 Q. So you got messages or phone  
6 calls?

7 A. BBMs, phone calls, text  
8 messages.

9 All the emails that they  
10 sent me, I think you guys have. There  
11 wasn't a lot of email correspondence.  
12 The majority of it was done by phone  
13 call.

14 Q. Did you have any emails with  
15 Ghislaine?

16 A. No, no email correspondence  
17 with Ghislaine.

18 Q. Did you have her phone  
19 number?

20 A. I did at the time, yeah.

21 Q. Do you remember what it was?

22 A. No.

23 Q. Do you remember what your  
24 number was?

25 A. No.

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2 MR. GUIRGUIS: Objection,  
3 asked and answered.4 Q. Tell me about any  
5 conversations you had with Ghislaine  
6 that involved FIT.7 MR. GUIRGUIS: Objection,  
8 form.9 A. I can't remember the  
10 specific conversation. There were  
11 many conversations. I was just  
12 applying -- doing an application form.  
13 And they were trying to get me in.  
14 They -- yeah, I can't remember the  
15 exact -- I think Ghislaine also knew  
16 people there, so they were basically  
17 trying to get me into FIT.18 Q. Well, tell me what you  
19 recall Ghislaine saying versus they?20 A. I can't remember  
21 specifically the conversation, so I  
22 would not like to speculate. But I  
23 will give you the overall conversation  
24 was regarding my FIT application, but  
25 I cannot remember the specific content

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2 or the specific words used.  
3 But it was surrounding my  
4 FIT application and an essay I had to  
5 write, and they both proofread my FIT  
6 application as well.

7 Q. And did they both read your  
8 essay?

9 A. Yes, they did.

10 Q. When did you write that  
11 essay?

12 A. I can't remember.

13 Q. Before you went to South  
14 Africa?

15 A. Yes.

16 Q. Do you know what the  
17 application deadline was?

18 A. I don't know. I don't know.  
19 I can't remember.

20 Q. When did you meet Alan  
21 Dershowitz?

22 A. I don't remember the  
23 specific date. It was a few months  
24 after I had been here in New York.

25 Q. Was it after you had gone to

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2 the island?

3 A. Yes.

4 Q. Do you know what time of  
5 year?

6 A. I mean, I think it was  
7 before winter.

8 Q. Well, you were here in the  
9 fall.

10 A. Yeah.

11 Q. And you left in the winter?

12 A. Yeah. I left in May.

13 Q. So did you meet him before  
14 you went to South Africa?

15 A. Yes.

16 Q. Well, let's be clear. You  
17 were here until you went to South  
18 Africa, and you left for a while and  
19 then you came back, right?

20 A. Mm-hmm.

21 Q. How long were you gone?

22 A. I think about three -- about  
23 three weeks.

24 Q. So you met him before you  
25 went to South Africa?

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2 A. Yes.

3 Q. And tell me about when you  
4 met Alan.

5 A. I first met Alan at the  
6 offices.

7 Q. And tell me what happened.

8 A. I can't really tell you what  
9 happened, because it's about a legal  
10 matter.

11 Q. Was he your lawyer?

12 A. He was going to be assigned  
13 to be my lawyer.

14 Q. Assigned to be your lawyer?

15 A. Through Jeffrey's  
16 instruction.

17 Q. Okay. Was he your lawyer?

18 MS. MCCAWLEY: Objection,  
19 asked and answered.

20 MS. MENNINGER: I don't know  
21 if there's a privilege.

22 MR. GUIRGUIS: There's a  
23 privilege whether he was retained  
24 or not, right? I mean, if you're  
25 at a cocktail party and you speak

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2 to a lawyer, you know that  
3 conversation is privileged.  
4 So...

5 MS. MENNINGER: Well, I  
6 don't, actually.

7 MR. GUIRGUIS: You're free  
8 to research it.

9 MS. MENNINGER: I will ask  
10 questions, then, to try to  
11 establish whether or not there's  
12 a good-faith basis.

13 Q. Did you approach Alan  
14 Dershowitz for the purpose of seeking  
15 legal advice?

16 A. I was introduced to Alan.

17 Q. By whom?

18 A. Jeffrey Epstein.

19 Q. On what day?

20 A. I don't recall what day.

21 Q. Was it related to some event  
22 that had occurred just before that?

23 A. Yes, that's correct.

24 Q. Were you in touch with any  
25 law enforcement authorities?

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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Hmm?

4 A. No.

5 Q. Was Jeffrey Epstein in the

6 room when you were speaking with Alan

7 Dershowitz?

8 A. Yes.

9 Q. Did Jeffrey Epstein overhear

10 your conversation with Alan

11 Dershowitz?

12 A. Yes.

13 Q. What did you talk about with

14 Alan Dershowitz?

15 MR. GUIRGUIS: Objection.

16 A. It --

17 MR. GUIRGUIS: Objection. I

18 direct the witness not to answer.

19 MS. MENNINGER: A third

20 party was in the room; you've

21 heard that, Counsel. And you

22 know that means that's a waiver.

23 MS. MCCAWLEY: No. I mean,

24 they would have been involved --

25 we don't know what the situation

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1 HIGHLY CONFIDENTIAL AEO  
2 is. They could have been  
3 involved together. There could  
4 be a number of reasons why  
5 Jeffrey had some sort of common  
6 interest with her with that.

7 Q. Did you sign a common  
8 interest agreement with Jeffrey?

9 MR. GUIRGUIS: Objection.

10 Do not answer.

11 MS. MENNINGER: Whether she  
12 had a common interest agreement  
13 with Jeffrey, you're instructing  
14 her not to answer; is that right,  
15 Counsel?

16 MR. GUIRGUIS: Do you have  
17 realtime in front of you,  
18 Counsel?

19 MS. MENNINGER: I don't.

20 MR. GUIRGUIS: You don't?  
21 You can borrow mine.

22 MS. MENNINGER: I don't want  
23 it. Thank you.

24 MR. GUIRGUIS: Okay.  
25 Q. Anyone else in the room when

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1 HIGHLY CONFIDENTIAL AEO

2 you spoke with Mr. Dershowitz?

3 A. No.

4 Q. Describe Mr. Dershowitz for  
5 me.

6 A. He -- old age; white, pasty  
7 skin; not very attractive. Wears  
8 glasses. Bit of an ugly man, really.

9 Q. Did he have any facial hair?

10 A. I can't recall at that time,  
11 no.

12 Q. Mustache?

13 A. I can't remember.

14 Q. Beard?

15 A. I can't remember.

16 Q. You can't remember if he had  
17 a mustache or a beard?

18 MR. GUIRGUIS: Objection,  
19 asked and answered.

20 MS. MCCAWLEY: Objection.

21 A. I don't recall seeing a  
22 massage -- sorry, a mustache on Alan  
23 Dershowitz. I don't recall a massive  
24 amount of facial hair. I recall Alan  
25 Dershowitz. Whether he had stubble or

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1 HIGHLY CONFIDENTIAL AEO  
2 not, I'm -- yeah, it's -- he didn't  
3 have a beard, I don't think.  
4 Q. All right. Did you sign an  
5 affidavit that you submitted in this  
6 case?

7 A. Yes.

8 Q. Did you make the allegation  
9 in your declaration that you had a  
10 sexual relationship with Alan  
11 Dershowitz?

12 A. Yes, I absolutely did.

13 Q. When did you have sex with  
14 Alan Dershowitz?

15 A. I can't remember the exact  
16 time, but it was in Jeffrey's New York  
17 apartment.

18 Q. Where in the apartment?

19 A. It was in a bathroom. I  
20 can't remember.

21 Q. Was it before or after you  
22 had this conversation that you won't  
23 describe?

24 A. It was after.

25 Q. So do you recall what month

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1 HIGHLY CONFIDENTIAL AEO  
2 that was? Before you went to South  
3 Africa or after you went to South  
4 Africa?

5 A. I can't remember.

6 Q. How long did you speak to  
7 Alan Dershowitz during your first  
8 meeting with him?

9 A. Until I was finished  
10 explaining what my legal matter was.

11 Q. Did he believe you to be --  
12 did he believe that he was your lawyer  
13 during that conversation?

14 MR. GUIRGUIS: Objection.

15 MS. MCCAWLEY: Objection.

16 MR. POTTINGER: Please.

17 MR. PAGLIUCA: All right,  
18 guys. You know, let's just do  
19 the deposition here without the  
20 chorus over there.

21 MR. GUIRGUIS: And without  
22 the speeches as well.

23 We agree, let's carry on  
24 without asking ridiculous  
25 questions about what other

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1 HIGHLY CONFIDENTIAL AEO  
2 people's mental state was. I  
3 think that's a good idea. Let's  
4 carry on.

5 Counsel?

6 Q. Did you ever sign a fee  
7 agreement with Alan Dershowitz?

8 A. No.

9 Q. Did you ever appear in court  
10 with Alan Dershowitz?

11 A. No.

12 Q. Did you ever appear in court  
13 yourself?

14 A. No.

15 Q. Did you ever have any  
16 contact with any law enforcement  
17 officers while you were in New York?

18 A. No.

19 Q. Any police?

20 A. No.

21 Q. After you left that meeting  
22 with Alan Dershowitz, when did you see  
23 him next?

24 A. I can't remember. I think  
25 it was at dinner. There was a dinner,

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1 HIGHLY CONFIDENTIAL AEO

2 yeah.

3 Q. And do you know whether the  
4 dinner was before or after you went to  
5 South Africa?

6 A. I can't remember the  
7 specific time period, so I don't  
8 remember if it was before or after.

9 But it was --

10 Q. Where was the dinner?

11 A. It was in a restaurant in  
12 New York.

13 Q. What restaurant?

14 A. I can't remember.

15 Q. Who else was there?

16 A. I remember Alan, Jeffrey,  
17 myself. And I can't remember if  
18 others -- if there were other people  
19 there.

20 Q. What type of restaurant was  
21 it?

22 A. It was a nice restaurant.

23 Q. Do you remember the type of  
24 cuisine?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. When was the next time --

3 what do you remember discussing that  
4 dinner?

5 A. The legal matter I had.

6 Q. Did you consider him to be  
7 your lawyer at that dinner?

8 A. Yes, I did.

9 Q. What's the next time that  
10 you saw Alan Dershowitz?

11 A. At Jeffrey's New York  
12 mansion.

13 Q. When was that?

14 A. It was after the second time  
15 I had met Alan.

16 Q. Had you been to South  
17 Africa?

18 A. I can't remember.

19 Q. Tell me what happened during  
20 that encounter.

21 A. I walked in the room -- I  
22 walked in the house. Jeffrey and  
23 Nadia and Alan were there.

24 Q. What happened after you  
25 walked in the house?

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1 HIGHLY CONFIDENTIAL AEO

2 A. I -- it was really strange,  
3 because Nadia didn't like me. And so  
4 when I arrived, we had -- I think -- I  
5 can't remember if I had, like, water  
6 or whatever.

7 Nadia took me upstairs. I  
8 remember there was a room. I didn't  
9 quite understand what was going on at  
10 the time. I knew obviously something  
11 was going on, because I never met  
12 Nadia socially.

13 So Nadia started undressing  
14 me in the room. She started  
15 undressing me by the bed. We got on  
16 the bed. I kind of knew what was  
17 going on from that. The girls were  
18 often forced to have sex with each  
19 other for Jeffrey's pleasure, so it  
20 was just another occasion, I guess.

21 Jeffrey then walked in the  
22 room. He started masturbating under  
23 his clothes. He put his hand in his  
24 trousers. A few minutes later Alan  
25 walked in the room. He started

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1 HIGHLY CONFIDENTIAL AEO  
2 undressing, he got on the bed with  
3 Nadia and myself, and we basically had  
4 a three-way sexual interaction.

5 Q. Was Alan fully unclothed?

6 A. During -- when? At what  
7 specific -- he walked in with clothes.

8 Q. And he got fully undressed?

9 A. Yes.

10 Q. So you saw his entire naked  
11 body?

12 A. Yes.

13 Q. Did you notice anything  
14 specific about his body?

15 A. Not that I recall. I mean  
16 -- yeah, not that I -- I can't really  
17 remember. It was quite a -- it was  
18 a -- it wasn't a pleasant experience.

19 Q. What did you do with Alan?

20 A. I gave him oral sex,  
21 masturbated him.

22 Q. Anything else?

23 A. He did the same with Nadia.  
24 He performed the same on me.

25 Q. Did he ejaculate?

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1 HIGHLY CONFIDENTIAL AEO

2 A. He did, yeah.

3 Q. In your mouth?

4 A. No.

5 Q. Did you have intercourse  
6 with him?

7 A. No, not penetration, no.

8 Q. Did you see him ejaculate  
9 more than once?

10 A. No, I didn't see him  
11 ejaculate more than once.

12 Q. You didn't notice any scars?

13 MS. MCCAWLEY: Objection.

14 A. I don't recall specific  
15 markings on every man I've been with  
16 body. So it's not something -- I  
17 wasn't ravishing Alan's body. I was  
18 trying to close my eyes and just get  
19 it done so I could go home and watch  
20 TV, really. So I wasn't really aware.

21 I didn't really like kind of  
22 go, woo, his body. I don't -- I don't  
23 recall his body at all. Like, I don't  
24 make a mental note of every man's body  
25 I've slept with.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Other than Jeffrey, is that  
3 the first time you had sex with  
4 another man in his home or on his  
5 property?

6 A. Sorry, can you just repeat  
7 the question.

8 MR. GUIRGUIS: Or rephrase  
9 it.

10 THE WITNESS: I'll just read  
11 it.

12 MR. GUIRGUIS: If you  
13 understand it.

14 A. Yeah, he was the only  
15 person, Alan Dershowitz.

16 Q. Did you have sex with him  
17 more than once?

18 A. No.

19 Q. At the occasion you just  
20 described, did he have an erection?

21 A. It was -- it was -- it  
22 wasn't particularly hard. It was  
23 pretty disappointing.

24 Q. And where did he ejaculate?

25 A. I had given him oral sex

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1 HIGHLY CONFIDENTIAL AEO  
2 and, well, he ejaculated -- he  
3 ejaculated. I mean, there's only so  
4 many places a man can ejaculate. He  
5 didn't ejaculate on me.

6 He didn't ejaculate in my  
7 mouth. I gave him oral and I  
8 masturbated him and finished him off.  
9 He ejaculated over himself, me.  
10 Just -- there wasn't a lot of  
11 ejaculation. I don't remember a lot  
12 of sperm. I didn't see massive  
13 amounts of semen. But I just remember  
14 him ejaculating, but it wasn't in my  
15 mouth.

16 Q. And in terms of time frame,  
17 the best you can say is this is after  
18 you had been to the island a few  
19 times?

20 A. That's correct.

21 Q. And you don't remember if it  
22 was before or after you went to South  
23 Africa?

24 A. I can't remember  
25 specifically, no.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you see Alan Dershowitz  
3 again after that one occasion?

4 A. No.

5 Q. So you saw him at the  
6 office, you say saw him at dinner, and  
7 you saw him that one time in the  
8 bedroom at Jeffrey's house?

9 A. That's correct.

10 MS. MENNINGER: It's 1:00.

11 I think we should take a small  
12 lunch break.

13 (Time noted: 1:01 p.m.)

14 (Luncheon recess.)

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1 HIGHLY CONFIDENTIAL AEO  
2 A F T E R N O O N S E S S I O N  
3 (Time noted: 1:54 p.m.)  
4 MR. GUIRGUIS: Counsel,  
5 before you commence with your  
6 questioning, I think there's one  
7 issue from this morning that the  
8 witness wants to correct herself  
9 on, so just let her do that now.

10 THE WITNESS: I said earlier  
11 that I would just like to correct  
12 that my lawyers are paying for --  
13 they are covering my hotel  
14 expense.

15 MS. MENNINGER: Thank you  
16 for that clarification.

17 THE WITNESS: And --  
18 MR. GUIRGUIS: Go ahead.  
19 THE WITNESS: And my flight.  
20 MS. MENNINGER: Thank you.  
21 SARAH RANSOME, RESUMED,  
22 having been previously and duly  
23 sworn, was examined and testified  
24 further, as follows:

25 CONTINUED EXAMINATION

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1 HIGHLY CONFIDENTIAL AEO  
2 BY MS. MENNINGER:  
3 Q. Going back to your first  
4 conversation with Alan Dershowitz, at  
5 any point in that conversation, had  
6 Mr. Dershowitz agreed to act as your  
7 lawyer?

8 A. Yes.

9 Q. Did he do anything in terms  
10 of contacting anyone on your behalf?

11 MR. GUIRGUIS: Objection.

12 Do not answer.

13 Q. What was the specific legal  
14 matter that you were seeking  
15 representation for?

16 MS. MCCAWLEY: Objection.

17 MR. GUIRGUIS: Objection.

18 Do not answer.

19 Q. What did you understand the  
20 purpose of Jeffrey Epstein being in  
21 the room for during that conversation?

22 A. Jeffrey was there to support  
23 me and Jeffrey was looking after me.

24 Q. When you engaged in sexual  
25 conduct with Alan Dershowitz, did you

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1 HIGHLY CONFIDENTIAL AEO  
2 see any evidence on his body of his  
3 surgical procedure?

4 A. I don't recall seeing  
5 anything. I can't remember.

6 Q. Did you see any bandages?

7 A. I can't remember.

8 Q. Did you see him bleed  
9 through his penis?

10 A. Not that I recall.

11 Q. Do you recall seeing  
12 Mr. Dershowitz bleed through his  
13 penis?

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

16 A. Not that I recall.

17 Q. When you were on the island,  
18 sometime less than ten times, you  
19 think, did you ever use any drugs?

20 A. No.

21 Q. Did you use cocaine?

22 A. No.

23 Q. Did you ever get thrown off  
24 the island for using cocaine?

25 A. No.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you drink alcohol?

3 A. No.

4 Q. None?

5 A. During on the island,  
6 whenever I was around Jeffrey,  
7 absolutely not.

8 Q. Other than going to the  
9 island, did you travel with Jeffrey  
10 anywhere else?

11 A. No.

12 Q. Did you ever travel anywhere  
13 with Ghislaine Maxwell?

14 A. No.

15 Q. Did you ever fly on an  
16 airplane with Ghislaine Maxwell?

17 A. I don't -- I don't remember.

18 Q. You don't remember any time  
19 you flew on a plane with Ghislaine  
20 Maxwell?

21 A. No, I don't remember. There  
22 were always many people on the plane.

23 Q. When you refer to the plane,  
24 you're referring to a private plane?

25 A. Jeffrey's plane, yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Did you travel on more than  
3 one plane of Jeffrey's?

4 A. Not that I -- no, I don't  
5 remember. I don't remember.

6 Q. Can you visualize in your  
7 head any other layout of a different  
8 type of plane than the one you drew in  
9 Defendant's Exhibit 1?

10 A. No.

11 Q. Why did you go to South  
12 Africa in early 2007?

13 A. To visit my family.

14 Q. And which family members did  
15 you visit?

16 A. My father and my stepmother.

17 Q. Anyone else?

18 A. No.

19 Q. Any siblings?

20 A. My younger brother and  
21 sister lived with my parents; my dad  
22 and my stepmom and their two younger  
23 children.

24 Q. Did you see any school  
25 friends there?

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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. Who paid for your plane  
4 ticket to go to South Africa?

5 A. Jeffrey did.

6 Q. How did that come about?

7 A. I wanted to see my family,  
8 and he funded the plane ticket because  
9 he was funding everything else at that  
10 time.

11 Q. What else was he funding at  
12 that time?

13 A. Accommodation, travel,  
14 taxis, food, my prescription that I  
15 had to pay for, for the prescription  
16 that -- prescription drugs.

17 Q. Had you taken any  
18 prescriptions for mental health  
19 disorders before October 2006?

20 A. No.

21 Q. Have you taken any since May  
22 of 2007?

23 A. Yes, I have.

24 Q. Which ones?

25 A. Paroxetine.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Anything else?

3 MS. MCCAWLEY: I'm going to  
4 object. There's no time frame on  
5 this. You're talking about one  
6 year? All the years from 2007 to  
7 2015? Which I would say is  
8 inappropriate for a nonparty  
9 witness to talk about her -- if  
10 you're talking generally about  
11 prescriptions.

12 Q. Are you on any medications  
13 right now?

14 A. Yes, I am.

15 MS. MCCAWLEY: Objection.

16 Q. What are you on right now?

17 A. Paroxetine.

18 Q. What's that for?

19 A. It's for posttraumatic  
20 stress and anxiety. Paroxetine, about  
21 a year, a year now.

22 Q. Was it prescribed to you  
23 before you moved to Barcelona?

24 A. Yes, it was.

25 Q. Who prescribed it to you?

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1 HIGHLY CONFIDENTIAL AEO  
2 MR. GUIRGUIS: Objection.  
3 You don't have to answer  
4 that.

5 MS. MENNINGER: On what  
6 grounds, Counsel?

7 MR. GUIRGUIS: I don't know  
8 what period you're talking about.  
9 I don't know what doctor you're  
10 talking about. I don't know why  
11 any of this is relevant. That's  
12 why I'm objecting.

13 MS. MENNINGER: So you're  
14 objecting on relevance grounds?

15 MR. GUIRGUIS: I'm objecting  
16 for relevance, and also for the  
17 same reasons that were just  
18 explained by counsel for  
19 plaintiff, which is that this is  
20 a nonparty witness and you're not  
21 even proffering a reason why  
22 you're asking the question.

23 So, yes, I'm not going to  
24 let this go totally far afield  
25 without objection. If you'd like

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1 HIGHLY CONFIDENTIAL AEO  
2 to proffer a reason, we can talk  
3 about it.

4 Q. You've been taking  
5 paroxetine for approximately a year?

6 A. Mm-hmm.

7 Q. Did you take any medications  
8 between 2007 and 2016 for any mental  
9 health disorders?

10 A. Yes, I did.

11 Q. What were they?

12 A. When I moved back to the UK,  
13 it was the same prescription drugs  
14 that Jeffrey's psychiatrist had  
15 prescribed me. I continued on with my  
16 medication even though I was wrongly  
17 diagnosed. I didn't know I had been  
18 wrongly diagnosed.

19 Q. When did you learn you had  
20 been wrongfully diagnosed?

21 A. When I went to a real  
22 doctor.

23 Q. When was that?

24 A. I saw a psychologist after  
25 2008, and they told me that the drugs

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1 HIGHLY CONFIDENTIAL AEO

2 I had been prescribed were incorrect.

3 Q. Those are the ones you  
4 mentioned earlier in your testimony?

5 A. Yeah. I had to stop and  
6 change medication, because I was first  
7 started on lithium. The lithium made  
8 me put on weight at quite a rapid  
9 rate, so I was put on so many  
10 different types of medication because  
11 I didn't -- not every one agrees with  
12 you. Weight was a massive issue for  
13 Ghislaine and Jeffrey, so the lithium  
14 just didn't work for me. I mean, I  
15 put on weight quite quickly.

16 Q. What did Ghislaine Maxwell  
17 say to you about weight?

18 A. Well, what did she not say?  
19 She bullied me massively about my  
20 weight.

21 Q. What did see say?

22 A. I was told that I would lose  
23 Jeffrey's financing if I didn't lose  
24 weight, and I would not -- they would  
25 not help me get into FIT.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who were you told that by?

3 A. Ghislaine and Jeffrey.

4 Q. In the same conversation?

5 A. Various conversations.

6 Q. Tell me your conversations  
7 with Ghislaine. When did she say that  
8 to you?

9 A. On the island.

10 Q. Before you went to South  
11 Africa?

12 A. Yes.

13 Q. And was that in person?

14 A. Yes.

15 Q. Who else was present?

16 A. Sarah Kellen, Nadia, a girl  
17 named [REDACTED] and a girl named [REDACTED].  
18 Sorry, I just remembered a name. A  
19 girl named [REDACTED] and a girl named  
20 [REDACTED].

21 Q. So they were all present  
22 when you had a discussion with  
23 Ghislaine about your weight on the  
24 island?

25 A. Yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. And what did Ghislaine say  
3 to you about your weight when you were  
4 on the island in front of all these  
5 people?

6 A. I can't remember the  
7 specific conversation, how it went.  
8 We got into an argument about my  
9 weight, quite a heated argument.

10 Q. What do you recall about the  
11 argument?

12 A. I recall it got so heated  
13 that I ran off and tried to swim off  
14 the island. I wanted to get as far  
15 away from Jeffrey and Ghislaine as  
16 possible.

17 Q. Okay. And then what  
18 happened?

19 A. I left the main house. I  
20 took -- there's like a buggy thing.  
21 It was evening. I drove to a  
22 particular spot on the island. It was  
23 -- so Jeffrey's island is quite rocky  
24 around the edges, so -- and it's not  
25 really -- you can't just go into the

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1 HIGHLY CONFIDENTIAL AEO  
2 water. It was quite steep. And,  
3 well, I didn't really know how to swim  
4 away. I didn't know how to escape.  
5 But I wanted to, at that precise  
6 moment, get as far as away from him as  
7 possible.

8 Q. So you had a heated argument  
9 about your weight with Ghislaine?

10 A. Ghislaine and Jeffrey.

11 Q. They were both there?

12 A. Yes.

13 Q. And do you remember anything  
14 that was said during that argument?

15 A. It was basically an  
16 ultimatum that I either lose weight  
17 or -- or that's it.

18 THE WITNESS: Sorry, can I  
19 -- sorry. I need to get a  
20 headache tablet, if you don't  
21 mind.

22 MS. MENNINGER: Go off the  
23 record for a second.

24 (An off-the-record  
25 discussion was held.)

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1 HIGHLY CONFIDENTIAL AEO

2 MS. MENNINGER: Go back on.

3 Q. You were given an ultimatum  
4 to lose weight or what?

5 A. They wouldn't help me to get  
6 into FIT, and that my time with  
7 Jeffrey would be -- would end.

8 Q. Who said what?

9 A. Well, they both -- they both  
10 said it in so many words. I can't  
11 remember the exact conversation. I  
12 remember it being heated. I remember  
13 them giving me the ultimatum. I think  
14 a few curse words were shared. I  
15 can't -- it was a very heated  
16 conversation. I can't remember the  
17 exact words.

18 Q. Was Natalya there?

19 A. No, I don't recall her being  
20 there.

21 Q. Were you taking the  
22 medications that you talked about  
23 earlier during this time period?

24 A. Yes.

25 Q. Had you put on weight since

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1 HIGHLY CONFIDENTIAL AEO  
2 taking those medications?  
3 A. Yes, I had. And I had also  
4 put on weight because I wasn't allowed  
5 to smoke any cigarettes at all, with  
6 Jeffrey on the island or anywhere near  
7 Jeffrey. Jeffrey wasn't allowed to  
8 know that we smoked.

9 So I put on also a lot of  
10 weight as well, in conjunction with  
11 the lithium. So yeah.

12 Q. How did the topic of your  
13 weight come up?

14 A. Well, I wasn't as skinny as  
15 the other girls, and Jeffrey liked his  
16 girls very thin.

17 Q. Were you interested in  
18 modeling at that point in time?

19 A. I was doing freelance  
20 modeling at the time, but I mean, I  
21 wasn't exactly going to be a Kate  
22 Moss. And the modeling agency thought  
23 I wasn't petite enough for them  
24 either.

25 I would like to clarify I

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1 HIGHLY CONFIDENTIAL AEO  
2 wasn't actually fat; I was normal  
3 weight, by the way, just to make that  
4 clear. I am 64, 65 kilograms at that  
5 time.

6 Q. Why did you understand that  
7 Jeffrey and Ghislaine wanted you to  
8 lose weight?

9 A. I was one of the girls that  
10 Jeffrey had sexual encounters with  
11 regularly. He liked his girls thin.

12 Q. Did you ask Jeffrey to help  
13 you become a model?

14 A. No. I wanted to get a  
15 degree and an education.

16 Q. So you were not attempting  
17 to become a model at that point in  
18 time?

19 A. No. I wanted to get an  
20 education as opposed to being a model.

21 Q. Did you talk to Jean Luc  
22 Brunel about becoming a model?

23 A. -- as I was freelancing  
24 during that time, or trying to get  
25 freelancing work, Jeffrey kept us on a

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2 little string with his massage  
3 payments, so I wanted to earn a  
4 separate income while I was doing my  
5 education to fund my living expenses.  
6 So, you know, I wanted to potentially  
7 increase my jobs.

8 But no, my job was not to be  
9 a high-fashion model. I wanted to get  
10 my degree, get my education and work  
11 in the fashion industry.

12 Q. You had worked as a model  
13 during college earlier, correct?

14 A. Yes.

15 Q. And you saved up money from  
16 that job, correct?

17 A. Yes.

18 Q. And you had used that money  
19 to fly to New York at some point,  
20 correct?

21 A. Yes.

22 Q. And what you're saying now  
23 is you would also potentially do  
24 modeling while you were studying in  
25 the future?

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2 MR. GUIRGUIS: Objection.

3 That's not at all what she's  
4 saying.

5 A. As in future, as in would I  
6 do modeling now?

7 Q. No. I'll rephrase the  
8 question.

9 A. Please.

10 MS. MENNINGER: Let's take a  
11 break, go off the record. And  
12 when you finish the salad, we'll  
13 proceed.

14 (Time noted: 2:14 p.m.)

15 (Recess.)

16 (Time noted: 2:15 p.m.)

17 MS. MENNINGER: Go back on  
18 the record.

19 Q. At the time you were having  
20 a discussion with Jeffrey and  
21 Ghislaine about your weight when you  
22 were on the island, did you have any  
23 intention of being a model at that  
24 time?

25 A. I was a freelance model. I

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2 wanted to increase my workload to help  
3 fund my living expenses. So it was  
4 not my intention to be a full-time  
5 model, because I quite clearly applied  
6 to a college to get an education that  
7 I was promised by Jeffrey Epstein.

8 Q. Between January of 2007 and  
9 today, have you worked as a model?

10 A. No.

11 Q. When you left for South  
12 Africa, did you have a ticket to  
13 return to the U.S.?

14 A. At that time, a return  
15 ticket hadn't been booked by Jeffrey  
16 yet.

17 Q. You traveled to South Africa  
18 to visit your family without a return  
19 ticket?

20 A. Yes.

21 Q. Did anyone travel with you  
22 to South Africa?

23 A. No.

24 Q. Your mother was not in South  
25 Africa when you went to South Africa

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2 on that occasion in 2007, correct?

3 A. Correct.

4 Q. What did you do while you  
5 were in South Africa in February of  
6 2007?

7 A. Spend time with my family.

8 Q. Anything else?

9 A. I spent time with my family,  
10 that's -- that's it.

11 Q. Did you visit any modeling  
12 agencies?

13 A. Yes, I did visit some  
14 modeling agencies.

15 Q. Which modeling agencies did  
16 you visit?

17 A. I can't remember the exact  
18 names. The modeling agencies were on  
19 Long Street in Cape Town. I visited  
20 several modeling agencies on Long  
21 Street, and Bree Street as well. Bree  
22 Street and Long Street and a few  
23 others in central Cape Town. So I  
24 visited a few, actually.

25 Q. Had you worked with any of

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2 those modeling agencies in the past?

3 A. No.

4 Q. Did you have any connections  
5 with any of those modeling agencies?

6 A. No.

7 Q. Did you have an agent at  
8 that time?

9 A. No.

10 Q. What did you do when you  
11 visited the modeling agencies in Cape  
12 Town in February of 2007?

13 A. I was requested to look for  
14 a PA for Mr. Epstein.

15 Q. What does that mean?

16 A. It means that he told me he  
17 would pay me a certain amount of money  
18 to find him a PA in South Africa.

19 Q. What do you understand the  
20 initials PA to stand for?

21 A. Personal assistant.

22 Q. What are the job  
23 responsibilities of a personal  
24 assistant?

25 A. To book flights, type, do

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2 faxes. Basically a PA is your -- a  
3 CEO's right-hand man of, you know,  
4 company's -- anything business-wise.  
5 They do everything, really, for that  
6 person.

7 Q. When did Jeffrey ask you to  
8 find him a PA while in South Africa?

9 A. Before I went.

10 Q. Did you agree to do that?

11 A. Yes.

12 Q. And you did go to the  
13 modeling agencies?

14 A. I told Jeffrey I did, but I  
15 actually -- I went to a couple and  
16 then I just -- it wasn't right. My  
17 gut instinct was -- yeah.

18 Q. What happened when you went  
19 inside the modeling agencies in Cape  
20 Town?

21 A. I was humiliated. I was  
22 completely embarrassed. I couldn't  
23 even ask them what Jeffrey was  
24 wanting. I mean, it was so absolutely  
25 ridiculous, his request of me finding

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2 him a PA.

3 Q. So what happened?

4 A. So I -- I asked if they had  
5 any girls that would want to travel;  
6 they would be put up in accommodation  
7 and they would be a PA.

8 And when I actually spoke to  
9 the modeling agencies, they actually  
10 laughed at me, because it was quite  
11 ridiculous that a young 22-year-old  
12 was asking a modeling agencies for a  
13 18-year-old PA for a multi-billionaire  
14 who had several already.

15 Q. So you recall a conversation  
16 where the person you were speaking to  
17 started laughing?

18 A. Yes.

19 Q. What type of person were you  
20 describing that you were looking for?

21 A. The same specifications that  
22 Jeffrey told me: She had to be 18,  
23 thin, very young looking, pretty.

24 Q. Anything else?

25 A. Well, bright and able to

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2 type.

3 Q. Did you go on a diet while  
4 you were in South Africa?5 A. I was forced to go on a  
6 diet.7 Q. Tell me what you mean by  
8 forced to go on a diet.9 A. After that incident on the  
10 island in -- it was December, when  
11 Ghislaine brought me back to the main  
12 house after she -- she sent a search  
13 party. She led a search party to find  
14 me on the island and bring me back.15 Q. Ghislaine led a search  
16 party?17 A. Yeah, yeah, yeah. She got  
18 everyone together and they all went  
19 looking for me when I disappeared.

20 Q. Who went looking for you?

21 A. Jean Luc, Jeffrey, the  
22 girls, Ghislaine.

23 Q. Which girls?

24 A. [REDACTED] and [REDACTED] the girl  
25 named [REDACTED]

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2 Q. Did Jeffrey go searching for  
3 you?

4 A. Yes.

5 Q. How do you know that?

6 A. I was told.

7 Q. About whom?

8 A. By [REDACTED] and the other  
9 girl.

10 Q. Where were you located?

11 A. On the island.

12 Q. Where on the island?

13 A. A corner of the island.

14 Q. On the water?

15 A. No. It was quite a long  
16 drop off the -- it was like a  
17 cliff-type -- I wasn't able to jump or  
18 get in the water.

19 Q. Your intent was to swim off  
20 the island, but you didn't make it  
21 into the water?

22 A. No, because I would have  
23 killed myself, so it wasn't safe.

24 Q. So who located you on this  
25 corner of the island?

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2 A. I can't remember who got to  
3 me first. I remember the -- I can't  
4 remember who found me first.

5 Q. Do you remember anyone who  
6 found you?

7 A. Yes, I was definitely found  
8 because I didn't have enough time to  
9 find a different location on the  
10 island so I could get off and swim  
11 away from Jeffrey and Ghislaine.

12 Q. Once they found you, what  
13 happened?

14 A. I was brought back to the  
15 main house.

16 Q. How were you brought back?

17 A. The same way that I got  
18 there, on the, like, beach buggy,  
19 black 4-by-4, not -- what are they.  
20 Quad things.

21 MS. MCCAWLEY: Quad bikes?

22 A. Quad bikes, yeah.

23 Q. Did you bike back?

24 A. Yes.

25 Q. Accompanied by some people?

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2 A. I was accompanied back, yes.

3 Q. By whom?

4 A. I can't remember  
5 specifically who it was.

6 Q. Okay. And once you got  
7 back, what happened?

8 A. They tried to calm me down.

9 Q. And then what happened?

10 A. From that evening onwards, I  
11 was -- Jeffrey put me on the Atkins  
12 Diet.

13 Q. Did you calm down?

14 A. Yes, I did.

15 Q. Did you take some more  
16 medications?

17 A. No. When you're on  
18 prescription drugs, you only take them  
19 at a specific required time.

20 Generally you don't take more than  
21 your prescription when you're on  
22 prescription drugs, so you don't kind  
23 of just throw tablets in your mouth.  
24 You kind of just take them in the  
25 morning or --

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2 Q. I asked a bad question.

3 A. Yeah.

4 Q. You said earlier that the  
5 prescriptions were causing you to gain  
6 weight, I thought you said.

7 A. Yes.

8 Q. And then you just said you  
9 were put on a diet after this event,  
10 correct?

11 A. Yes.

12 Q. And what do you mean by you  
13 were put on a diet?

14 A. Jeffrey said, you either go  
15 on the Atkins Diet, or I can go.

16 Q. Go meaning off the island?

17 A. As in, don't call me back,  
18 Sarah.

19 Q. Here's the question: Did  
20 you discontinue the medications at the  
21 same time you went on the Atkins Diet?

22 A. No.

23 Q. And how long were you on the  
24 Atkins Diet?

25 A. Long enough for my kidneys

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2 to be incredibly painful and for me to  
3 no longer continue on the diet because  
4 it was unsafe to do so.

5 Q. Did you seek medical help  
6 for that pain?

7 A. I just took painkillers.

8 Q. What painkillers did you  
9 take?

10 A. I can't remember what  
11 painkillers.

12 Q. Prescription or  
13 over-the-counter?

14 A. Over-the-counter.

15 Q. Were you on the diet for  
16 more than a week?

17 A. Yes, I was.

18 Q. More than a month?

19 A. Yes.

20 Q. More than two months?

21 A. I can't remember.

22 Q. Were you on the diet the  
23 whole time you were in South Africa?

24 A. Yes.

25 Q. Did you continue on the diet

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2 after you returned?

3 A. Yes.

4 Q. What was the lowest weight  
5 that you reached during that period of  
6 time on the diet?

7 A. 56 kilograms.

8 Q. Had you ever weighed  
9 56 kilograms in your adult life --

10 A. No.

11 Q. -- previously?

12 A. No.

13 Q. Have you since?

14 A. No.

15 Q. Did you speak to Jeffrey  
16 again about that diet?

17 A. Multiple times.

18 Q. What did you say?

19 A. I complained frequently  
20 about the diet that he had put me on,  
21 because it was seriously affecting my  
22 physical health as well as my mental  
23 health. Yeah, it's a pretty hectic  
24 diet.

25 Q. The time you were on this

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2 diet, did you have a boyfriend?

3 A. Oh, yeah. Yes.

4 Q. Who was your boyfriend at

5 the time?

6 A. Adam.

7 Q. Ralph?

8 A. That's Andy Ralph. This is

9 Adam.

10 Q. What's Adam's last name?

11 A. I think it's Castellani.

12 Q. Where did he live?

13 A. In the Upper East Side.

14 Q. Did you talk to Adam about

15 your diet?

16 A. Yes.

17 Q. Were you living with Adam?

18 A. Not at -- not when I was in

19 South Africa.

20 Q. When you returned from South

21 Africa, did you move in with Adam?

22 A. Yes, I did, to get away from

23 Jeffrey.

24 Q. And where on the Upper East

25 Side did Adam live?

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2 A. I can't remember.  
3 Q. Walkup or elevator building?  
4 A. Elevator.  
5 Q. How big was that apartment?  
6 A. It's relatively small.  
7 Q. More than one bedroom?  
8 A. No, it was just one bedroom.  
9 It was a small, tiny apartment.  
10 Q. And what did Adam do for a  
11 living?  
12 A. He was a banker.  
13 Q. Where did he work?  
14 A. He worked at -- I can't  
15 remember where he worked.  
16 Q. How did you meet Adam?  
17 A. At a delicatessen, when I  
18 was buying food.  
19 Q. Had you started dating him  
20 before you went to South Africa?  
21 A. I think we had gone on a  
22 couple dates or something.  
23 Q. Where had you gone on your  
24 dates?  
25 A. I can't remember.

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2 Q. When you were in South  
3 Africa, did you have contact with  
4 Adam?

5 A. Once or twice, like three  
6 times. Well, we were sort of seeing  
7 each other, so I don't know how many  
8 phone times I spoke to him in a month.  
9 Yeah, a few times I spoke to Adam.

10 Q. When you spoke to him, did  
11 he ask you to move in with him when  
12 you returned?

13 A. I wouldn't really say that.  
14 I wouldn't really say he asked me to  
15 move in.

16 Q. Okay. What would you say?

17 A. I asked him for me to move  
18 in with him.

19 Q. Okay. While you were in  
20 South Africa, did you receive any  
21 phone calls from Jeffrey?

22 A. Yes.

23 Q. Did you want Jeffrey to call  
24 you there?

25 A. Yes. He was helping me get

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2 into FIT.

3 Q. Any other reason for you to  
4 have communications while you were in  
5 South Africa?

6 A. I was living in his  
7 apartment.

8 Q. In South Africa?

9 A. In New York.

10 Q. So you wanted to have  
11 communications with Jeffrey while you  
12 were in South Africa because you were  
13 living in his apartment in New York?

14 MS. MCCAWLEY: Objection.

15 A. And he was going to -- he  
16 promised that he would pay for my  
17 education. And I was staying in his  
18 apartment and he was funding my life,  
19 so of course I would want him to  
20 contact me.

21 And, also, he was still --  
22 he told me he would pay for my return  
23 ticket. So, yeah, of course I wanted  
24 him to contact me.

25 (An off-the-record

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2 discussion was held.)

3 Q. Did you have an intention  
4 while you were in South Africa to go  
5 to Miami upon your return?

6 A. I think there was a vague  
7 conversation about it, but I had no  
8 real intention of going to Miami. I  
9 had a conversation with Natalya about  
10 it.

11 Q. What, if anything, were you  
12 going to do in Miami?

13 A. I can't remember.

14 Q. Did you have a job lined up  
15 in Miami?

16 A. I can't remember.

17 Q. An internship?

18 A. It was something to do with  
19 Jeffrey, that Jeffrey, Natalya and --  
20 it would have -- it would have -- it  
21 was through Jeffrey, something with  
22 Miami. I can't remember what it was  
23 for or -- I don't remember. It  
24 didn't -- it was just a conversation  
25 about Miami.

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2 Q. So not a real firm plan to  
3 go to Miami?

4 A. No, no.

5 Q. Were you disappointed when  
6 you didn't go to Miami?

7 A. No, no, not at all.

8 Q. And you weren't planning to  
9 be a model in Miami, for example?

10 A. No.

11 Q. You said that Jeffrey had  
12 agreed to pay for your education?

13 A. Yes.

14 Q. Did you apply to any other  
15 school besides FIT?

16 A. No.

17 Q. Do you know whether you met  
18 the qualifications to get into FIT?

19 MR. GUIRGUIS: Objection,  
20 form.

21 A. Yes.

22 MR. GUIRGUIS:

23 Comprehensibility.

24 MS. MENNINGER: She seemed  
25 to understand it just fine.

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2 MR. GUIRGUIS: I don't know  
3 if she did, but fine.4 Q. Do you know how much FIT was  
5 supposed to cost per year?

6 A. No.

7 Q. Did you believe it to be  
8 expensive?

9 A. All schools are expensive.

10 Q. You had previously attended  
11 Queen Margaret College; is that right?

12 A. Queen Margaret University.

13 Q. My apologies.

14 How much did Queen Margaret  
15 University cost?

16 A. I can't remember.

17 Q. Did you apply for any  
18 financial aid for FIT?19 A. No. Jeffrey was covering  
20 FIT.21 Q. That's what Jeffrey told  
22 you?

23 A. Multiple, multiple times.

24 Q. Did Ghislaine Maxwell say  
25 anything to you with regards to FIT?

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2 A. It was various  
3 conversations. It was known among  
4 everyone that I was going to FIT, and  
5 Jeffrey -- everyone knew he was  
6 helping me to get into FIT. It was  
7 common knowledge.

8 Q. You described earlier that  
9 Ghislaine was helping review your  
10 application and your essay.

11 Was there something else  
12 that she was doing to help you?

13 A. Well, she said she would,  
14 but whether she did, I have no idea.  
15 She said she would. Whether she made  
16 calls, I doubt, because I didn't end  
17 up at FIT. So...

18 Q. Did you get accepted there?

19 A. I never heard from anyone at  
20 FIT.

21 Q. You never got a response?

22 A. No.

23 Q. Did you have an email  
24 address at that time?

25 A. Yes, I did.

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2 Q. Do you have a copy of your  
3 FIT application?

4 A. I think it's somewhere. I  
5 think it's in the email.

6 Q. There's an essay and then  
7 there's an application, correct?

8 A. Yes, that's correct. I can  
9 find the essay if you want.

10 MR. GUIRGUIS: I think we've  
11 already produced that essay.

12 Q. While you were in South  
13 Africa, did you have any phone  
14 conversation with Ghislaine?

15 A. Yes.

16 Q. When was that?

17 A. Through various times  
18 throughout my stay in South Africa.

19 Q. What phone were you using  
20 while you were in South Africa?

21 A. I had the BlackBerry that  
22 they had given me, and they also  
23 phoned my parents' landline as well.

24 Q. Who is they?

25 A. Jeffrey, Ghislaine and

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2 Lesley Groff.

3 Q. Did Ghislaine speak to your  
4 parents?

5 A. Yes.

6 Q. Who did she speak to?

7 A. I can't remember if she  
8 spoke -- I can't remember, actually.  
9 I can't remember who she spoke to.

10 Q. How do you know that she  
11 spoke to your parents?

12 A. Because I remember it being  
13 a huge thing, and my family -- because  
14 they couldn't quite understand what  
15 Jeffrey and Ghislaine were doing  
16 paying for their daughter's education,  
17 and they obviously thought --  
18 suspected something was going on.

19 Q. So how do you know that  
20 someone spoke to your parents?

21 A. Because my parents and I  
22 fought about it.

23 Q. Did your parents tell you  
24 that they spoke to Ghislaine?

25 A. I -- I can't remember. I

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2 remember having a huge row with my  
3 family because they had spoken to --  
4 so there were multiple phone calls  
5 during the duration of that month,  
6 okay. There's not a specific call.  
7 There were multiple calls.

8 There were multiple emails.  
9 I produced emails during that time  
10 frame, back-and-forth emails between  
11 Lesley Groff and myself. So they  
12 were -- they contacted me regularly.  
13 Ghislaine, Lesley Groff and Jeffrey  
14 Epstein phoned me a few times.

15 Q. Did your parents tell you  
16 that they spoke to Ghislaine?

17 A. I knew with my own -- that  
18 they had spoken to Ghislaine.

19 Q. How did you know that?

20 A. Because I know that they had  
21 spoken. They told me that they had  
22 spoken. I know she made communication  
23 with my family.

24 Q. Your family told you that  
25 they had spoken to Ghislaine?

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2 MR. GUIRGUIS: Objection,  
3 asked and answered.

4 A. Yes.

5 Q. Who in your family told that  
6 you they had spoken to Ghislaine?7 A. I can't remember whether it  
8 was my stepmother or my father. I  
9 cannot remember which one it was.10 Q. What did your stepmother or  
11 father tell you they had discussed  
12 with Ghislaine?13 A. That she had reassured them  
14 that my education would be paid for  
15 and -- basically that. You know, they  
16 spent a lot of time and effort  
17 reassuring my family they weren't  
18 abusing me, which they were, and that  
19 they weren't going to traffic me,  
20 which they were.21 So there you go. I had to  
22 lie to my family.23 Q. What is your stepmother's  
24 name?

25 A. Linda Ransome.

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2 Q. And do you have an email  
3 address or phone number for her?

4 A. No, I don't.

5 MR. GUIRGUIS: Objection.  
6 No current information. Same  
7 objection as at the outset of  
8 deposition.9 MS. MENNINGER: Are you  
10 instructing her not to answer?11 MR. GUIRGUIS: I am  
12 instructing her not to answer.

13 Q. Where does Linda --

14 MR. GUIRGUIS: And I'm again  
15 offering you to the opportunity  
16 to proffer a reason for these  
17 questions. And I --18 MS. MENNINGER: I'll tell  
19 you. Your client has signed an  
20 affidavit and a complaint  
21 discussing this conversation, and  
22 I'm asking for contact  
23 information for a witness to the  
24 conversation, the person who  
25 actually supposedly had a phone

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2 conversation with my client. And  
3 you're telling me I can't follow  
4 up with those witnesses.

5 Q. So please tell me how to  
6 reach your stepmother, Linda Ransome.

7 A. I'm not going to offer you  
8 my family's address details.

9 MR. GUIRGUIS: You don't  
10 have to answer.

11 Go on.

12 MS. MENNINGER: You may come  
13 back and answer it another day,  
14 but...

15 Q. Where does Linda Ransome  
16 live?

17 A. She lives in Cape Town.

18 Q. Where in Cape Town?

19 A. I don't know.

20 Q. Have you been in touch with  
21 her?

22 A. Not recently, no.

23 Q. When is the last time you  
24 communicated with her?

25 A. A while back.

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2 Q. More than a year?

3 A. Less than a year.

4 Q. Is she still married to your  
5 father?

6 A. I presume so.

7 Q. Have you talked to him in  
8 the same period of time?

9 A. No.

10 Q. Why haven't you talked to  
11 your family in more than a year?

12 MS. MCCAWLEY: Objection.

13 This is getting into her current  
14 relationships, which is not  
15 relevant to the case and also can  
16 be used for harassment.

17 Q. Why haven't you talked to  
18 your family in a year?

19 A. Because I came forward.

20 Q. When did you come forward?

21 A. October, around October.

22 Q. Have you spoken to your  
23 family since October?

24 A. No.

25 Q. When was the last time you

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2 spoke to your father or stepmother  
3 before October?

4 A. September.

5 Q. And did you tell them not to  
6 contact you or did they tell you not  
7 to contact them?

8 A. Well, I didn't -- I  
9 basically said to them, either accept  
10 me for who I am or we need to stop  
11 this relationship.

12 Q. What did you mean by accept  
13 you as you are?

14 A. I've made a lot of poor  
15 choices, particularly Jeffrey, being  
16 involved with Jeffrey Epstein. And  
17 they feel I've come a long way from  
18 that time, and they thought that they  
19 didn't want me going back to a time  
20 that was very traumatic for me.

21 Q. Did they tell you they would  
22 not be in touch with you going  
23 forward?

24 A. I didn't give them that  
25 option for them to tell me that.

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1 HIGHLY CONFIDENTIAL AEO  
2 Q. So your not having a  
3 conversation with your father and  
4 stepmother in a year is because of  
5 your choice to come forward?

6 A. That's correct.

7 Q. What about your mother?

8 MR. GUIRGUIS: Objection to  
9 form.

10 A. What about my mother?

11 Q. Have you had contact with  
12 her in a year?

13 A. Yes.

14 Q. When was the last time you  
15 had contact with your mother?

16 A. Last week.

17 Q. When you returned to New  
18 York and moved in with Adam, did you  
19 talk to Adam about Jeffrey Epstein?

20 A. Yes.

21 Q. What did you tell Adam?

22 A. I told him that I was  
23 frightened.

24 He was incredibly concerned  
25 about my weight loss and about the

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1 HIGHLY CONFIDENTIAL AEO  
2 weight goal that Jeffrey and Ghislaine  
3 set for me, which was 52 kilograms.  
4 He was scared for me, actually.

5 Q. To your knowledge, did he  
6 contact anyone about it?

7 A. Not to my knowledge.

8 Q. What did he do about his  
9 concern, to your knowledge?

10 A. I begged him if I could live  
11 with him, and he agreed.

12 Q. How long did you live with  
13 him?

14 A. It wasn't really long,  
15 because I moved in with him after  
16 South Africa. So about a month or  
17 something.

18 Q. From the time you returned  
19 from South Africa to when you returned  
20 to South Africa?

21 A. Oh. Yeah, no, we only kind  
22 of went -- we only dated for briefly.  
23 It wasn't a serious relationship.  
24 Yeah. So when I moved to New York --  
25 sorry, back to London, kind of our

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1 HIGHLY CONFIDENTIAL AEO

2 relationship couldn't really go  
3 anywhere, I guess.

4 Q. The long distance?

5 A. Yeah, long distance doesn't  
6 really work, so...

7 Q. So about the time you moved  
8 back to London is when you and he  
9 broke up?

10 A. That's correct.

11 Q. Have you had contact with  
12 him since then?

13 A. I had contact with him again  
14 in 2008.

15 Q. Did you come back to the  
16 U.S. then?

17 A. No.

18 Q. You did not come back to the  
19 U.S. in 2008?

20 A. Oh, I did, sorry, for a  
21 business trip. I went -- I did a  
22 tour, yeah, from -- I think it was  
23 Atlantic to Atlanta to San Francisco.

24 Q. With which business?

25 A. Belfairs International.

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1 HIGHLY CONFIDENTIAL AEO  
2 It's a private company at that time  
3 that did private planes, the interiors  
4 of private planes.

5 (An off-the-record  
6 discussion was held.)

7 Q. One more time. Can you  
8 spell that?

9 A. Sorry. B-A-R- -- sorry, B-  
10 -- sorry. It's getting so bad. I'm,  
11 like, really bad at spelling. It's  
12 B-E-L-F-A-I-R-S, Belfairs  
13 International.

14 Q. You were working with them  
15 in 2008?

16 A. Briefly.

17 Q. And you came for a business  
18 trip?

19 A. Yes.

20 Q. And how long were you in the  
21 U.S. on that occasion?

22 A. Gosh, I can't remember. It  
23 was like a week.

24 Q. And who did you come with?

25 A. My manager of business.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What was that person's name?

3 A. David.

4 Q. What's the last name?

5 A. I can't remember the last  
6 name.

7 Q. So you came back to the U.S.  
8 in 2008, but you did not have contact  
9 with Adam on that trip?

10 A. No.

11 Q. When did you have contact  
12 with Adam in 2008?

13 A. He moved to London in 2008.

14 Q. Did you see him in London?

15 A. Yes, I did.

16 Q. Where did you see him?

17 A. He came to stay with me in  
18 London.

19 Q. Did you resume your  
20 relationship?

21 A. Briefly.

22 Q. Is that the last time you've  
23 had contact with him?

24 A. Yes.

25 Q. Was that about the time you

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1 HIGHLY CONFIDENTIAL AEO

2 became engaged to --

3 A. Andy.

4 Q. -- Andy?

5 A. Andy and I got together at  
6 the end of 2008. We didn't meet and  
7 then get engaged immediately. It was  
8 like we dated and then got engaged.

9 Q. Understood.

10 In addition to discussing  
11 Jeffrey with Adam, is there someone  
12 else you discussed Jeffrey with in  
13 your life in 2006 or 2007?

14 A. Well, I discussed it with  
15 everyone I knew. It's quite an amaz-  
16 -- he's an amazing man. Yeah,  
17 everyone I knew knew that I was  
18 involved with Jeffrey Epstein.  
19 Everyone that I met in New York knew  
20 that I was affiliated with Jeffrey  
21 Epstein and Ghislaine Maxwell.

22 Q. More specifically, who did  
23 you tell that you had concerns about  
24 your relationship with Jeffrey?

25 A. My friend Pam. And there

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1 HIGHLY CONFIDENTIAL AEO  
2 were a few other friends I had at the  
3 time, but I don't remember their  
4 names.

5 Q. Did you discuss it with  
6 Pumla?

7 A. Yes.

8 Q. What did you tell Pumla?

9 A. Everything that Jeffrey did  
10 to me. I told her every single detail  
11 on how he abused me.

12 Q. How did Jeffrey abuse you?

13 A. There were times that I was  
14 -- I mean, look, I was intimidated. I  
15 was frightened of Jeffrey, okay. I  
16 wanted to go to FIT, get an education.  
17 But if I didn't comply with Jeffrey's  
18 requests, I was scared. Okay?

19 So how did he abuse me?

20 When he had me on, like, the massage  
21 table, I had no option. So how did he  
22 abuse me? By putting a vibrator and  
23 pushing it down on my clitoris for ten  
24 minutes, that's abuse. That was not  
25 pleasurable; that was exceptionally

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1 HIGHLY CONFIDENTIAL AEO  
2 painful. He hurt me physically and he  
3 abused me mentally, both.

4 Q. How did he abuse you  
5 mentally?

6 A. Jeez. Well, I think the  
7 fact that -- A, physical abuse always  
8 leads to mental abuse. It's a fact.  
9 So you can't physically abuse someone  
10 and they can't be mentally, because  
11 they will -- without a doubt, I'm sure  
12 myself and all the other girls will  
13 have suffered some form of  
14 posttraumatic stress.

15 So in terms of how did he  
16 mentally abuse me? He bullied me. He  
17 went on about my weight. He  
18 intimidated me. He promised me things  
19 he didn't deliver. I mean, I could go  
20 on. So...

21 Q. What things did he promise  
22 you that he didn't deliver?

23 A. An education.

24 Q. And what do you know about  
25 what he did or didn't do to get you an

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1 HIGHLY CONFIDENTIAL AEO

2 education?

3 A. Well, I didn't go to FIT, so  
4 I presume not very much.5 Q. Do you know why you didn't  
6 get into FIT?7 A. No, no. It just didn't ever  
8 materialize.9 Q. Did you ever contact FIT to  
10 find out?11 A. During that time, Jeffrey  
12 had it in hand. I didn't think I  
13 needed to contact anybody at FIT. I  
14 mean, Jeffrey -- it was Jeffrey's  
15 contact in the first place that he was  
16 contacting. So I didn't contact  
17 anyone at FIT.18 Q. You didn't contact them at  
19 all?20 A. Well, no, because Jeffrey  
21 said that he was going to do that for  
22 me to get me into FIT.23 Q. And how did you ever confirm  
24 or deny that you weren't admitted to  
25 FIT?

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1 HIGHLY CONFIDENTIAL AEO  
2 A. I was never told. I was  
3 never given a letter. I didn't have  
4 anyone phone me. I didn't have the  
5 contact that Jeffrey had been speaking  
6 to about getting me in. She didn't  
7 contact me. So I'm presuming as an  
8 educated woman it was all hearsay,  
9 because nothing ever materialized from  
10 that.

11 Q. Did FIT have your address at  
12 Adam's?

13 A. Not that I recall.

14 Q. Did you give Jeffrey your  
15 address at Adam's?

16 A. Yes, Jeffrey knew where I  
17 lived.

18 Q. I understood you were going  
19 to live with Adam in order to get away  
20 from Jeffrey.

21 A. So when -- so basically when  
22 you live in someone's apartment, it's  
23 a form of control. So when you don't  
24 comply with their instructions all the  
25 time, hundred percent, it's like

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1 HIGHLY CONFIDENTIAL AEO  
2 leverage for them to control you.  
3 I don't like being  
4 controlled by people, especially by  
5 someone like Jeffrey Epstein and  
6 Ghislaine Maxwell.

7 So Jeffrey Epstein, he knew  
8 where I was all the time, so...

9 Q. Did Jeffrey come to Adam's  
10 apartment?

11 A. He came around the Upper  
12 East Side near the apartment, yes, he  
13 did. There was an occasion that  
14 Jeffrey Epstein picked me up when I  
15 didn't go to the mansion.

16 Q. Picked you up where?

17 A. I can't remember the  
18 location.

19 Q. Jeffrey lived on the Upper  
20 East Side?

21 A. I can't remember where  
22 Jeffrey -- his exact location is. I  
23 mean, it's a nice -- I think it's near  
24 5th. It's near 5th Avenue.

25 Q. Was it on the Upper East

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1 HIGHLY CONFIDENTIAL AEO

2 Side?

3 A. I think. I don't think it  
4 was on the West Side. So hang on. So  
5 5th Avenue is there. Is the West Side  
6 that side?7 I don't know -- sorry. I'm  
8 really -- I'm a tourister, so I don't  
9 know. I don't know where Jeffrey -- I  
10 know that he's got -- it was near 5th  
11 Avenue. That's where I know his  
12 apartment was.

13 I'm not a New Yorker, so...

14 Q. Do you recall an occasion  
15 while you were living with Adam that  
16 Jeffrey came and picked you up?

17 A. Yes.

18 Q. Somewhere on the Upper East  
19 Side?

20 A. Yes.

21 Q. You don't know where?

22 A. No, I don't know the  
23 specific street, name or pavement that  
24 I was standing on, no, I don't.

25 Q. Where did you go with

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1 HIGHLY CONFIDENTIAL AEO  
2 Jeffrey when he picked you up on the  
3 Upper East Side?

4 A. I got in his car and went  
5 back to his mansion.

6 Q. What kind of car was it?

7 A. It was a -- I can't remember  
8 what car it was.

9 Q. Who was driving the car?

10 A. He wasn't driving. I can't  
11 remember who was driving.

12 Q. Was anyone else in the car?

13 A. Someone was driving the car.

14 Q. Anyone else?

15 A. I can't remember anyone  
16 else.

17 Q. What was the purpose of your  
18 going back to the mansion on that  
19 occasion?

20 A. I don't know. You're going  
21 to have to ask Jeffrey.

22 Q. Why did you get in the car?

23 A. Because I was frightened.

24 Q. What were you frightened of?

25 A. The fact that he had found

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1 HIGHLY CONFIDENTIAL AEO  
2 me and wasn't supposed to know where I  
3 was. So I was incredibly intimidated  
4 that he drove up beside me and knew  
5 where I was.

6 Q. You were somewhere out on  
7 the street visible and he found you?

8 A. No. I was supposed to meet  
9 Jeffrey. I was instructed to meet  
10 Jeffrey. I failed to turn up to meet  
11 Jeffrey and Jeffrey found me.

12 Q. Who instructed you to meet  
13 Jeffrey?

14 A. It was one of the girls. It  
15 was either Sarah Kellen or Lesley  
16 Groff.

17 Q. How did they instruct you to  
18 meet Jeffrey?

19 A. Via the BlackBerry they gave  
20 me.

21 Q. You kept the BlackBerry  
22 after you returned from South Africa?

23 A. Yes, I did.

24 Q. While you were living with  
25 Adam?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Yes.

3 Q. Why did you keep the  
4 BlackBerry after you were living with  
5 Adam?6 A. Because Jeffrey and I were  
7 still in contact.8 Q. What were you in contact  
9 about? The FIT application?10 A. He was trying to get me a  
11 visa, and he -- he devised a way of me  
12 getting -- I don't know what you call  
13 it, sorry -- an apprenticeship, an  
14 internship with a cosmetic company.  
15 Yeah, a cosmetic agency, doctor's  
16 medical facility.17 Q. When you came back from  
18 South Africa in February of 2007, did  
19 you have a tourist visa?

20 A. Yeah, yes.

21 Q. So Jeffrey was trying to  
22 help you get a job so you could get a  
23 different kind of visa?24 A. Yeah. Well, you can't live  
25 in New York on a tourist visa. It's

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1 HIGHLY CONFIDENTIAL AEO  
2 three months, so -- so I don't know  
3 what it's like anymore, the laws. But  
4 back then, if you wanted to tour  
5 America, you would go and fill -- I  
6 think it was 90 days, but then you  
7 would have to leave. You couldn't  
8 stay.

9 And Jeffrey was trying to  
10 get me a -- it's difficult, not  
11 being -- it's difficult actually going  
12 to university here if you don't have a  
13 British -- I don't know the system. I  
14 just didn't have a visa I could go to  
15 FIT.

16 And this friend of his that  
17 owned a cosmetic surgery, he had  
18 organized that I would go in and do an  
19 internship, and that way would be a  
20 legitimate way to -- for me to get a  
21 visa, for me to stay and continue in  
22 FIT. If that makes sense.

23 Q. What was the name of that  
24 friend?

25 MR. GUIRGUIS: Do you need a

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1 HIGHLY CONFIDENTIAL AEO

2 break?

3 THE WITNESS: I do, sorry.

4 Do you mind?

5 MS. MENNINGER: There was a  
6 question pending.

7 MR. GUIRGUIS: She has a  
8 question pending. You can answer  
9 that, then. Go ahead.

10 What was the name of that  
11 friend?

12 THE WITNESS: I don't know.

13 It was a man.

14 Q. Did you end up working in  
15 that internship?

16 A. No.

17 Q. Did you ever meet with that  
18 man?

19 A. Yes.

20 Q. Why didn't you end up  
21 working in that internship with that  
22 man?

23 A. I wanted to return home.

24 MR. GUIRGUIS: Can we take  
25 that break?

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1 HIGHLY CONFIDENTIAL AEO  
2 MS. MENNINGER: Yes.  
3 (Time noted: 3:04 p.m.)  
4 (Recess.)  
5 (Time noted: 3:20 p.m.)  
6 MS. MENNINGER: Going back  
7 on the record.

8 MR. GUIRGUIS: Before you  
9 proceed with your questions,  
10 Counsel, I raised an objection to  
11 providing Linda Ransome's email  
12 address before. Then you  
13 proffered a reason for it.

14 I accept your proffer and I  
15 will provide you that email  
16 address now, or have the witness  
17 do it.

18 MS. MENNINGER: Okay.

19 THE WITNESS: It's  
20 [REDACTED]

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

23 MR. GUIRGUIS: And let the  
24 record reflect she's taking it  
25 down from a Google search on the

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1 HIGHLY CONFIDENTIAL AEO  
2 web. She believes that's right.  
3 Q. What is your father's email  
4 address?

5 A. I don't remember it offhand.  
6 MS. MENNINGER: Can you mark  
7 this.

8 (Defendant's Exhibit 3,  
9 affidavit, was marked for  
10 identification.)

11 Q. Do you recognize the  
12 document we marked as Defendant's  
13 Exhibit 3?

14 A. Yes.

15 Q. What is it?

16 A. My affidavit.

17 Q. Who wrote this affidavit?

18 A. Well, I -- I -- I didn't  
19 type it up, but I gave the affidavit.

20 Q. So you spoke words to  
21 someone else and they typed it?

22 A. Yes.

23 Q. Who was that person?

24 A. I don't know.

25 Q. Who was the person you gave

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1 HIGHLY CONFIDENTIAL AEO

2 words to?

3 MR. GUIRGUIS: Was it an  
4 attorney?

5 THE WITNESS: Yes.

6 MR. GUIRGUIS: Okay.

7 Q. Which attorney?

8 MR. GUIRGUIS: I think I'm  
9 going to object to that. I don't  
10 know that it matters which  
11 attorney or which attorney  
12 provided the work or did specific  
13 tasks. I think that's  
14 privileged.

15 Q. Did you communicate these  
16 words to a attorney with the intent  
17 that they would put it into an  
18 affidavit that you would share  
19 publicly?

20 A. I don't know that the  
21 affidavit is public, but to share  
22 with -- with you guys.

23 Q. With a third party?

24 A. Yeah, with a third party.

25 Q. And you knew that at the

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1 HIGHLY CONFIDENTIAL AEO  
2 time you were giving the words to the  
3 person to type up?

4 A. Yeah, to give to you guys.

5 Q. So who was the person that  
6 you were speaking to that took down  
7 the words for your affidavit?

8 A. Sorry. It was Stan and  
9 Brad.

10 Q. And when did you have that  
11 conversation with them?

12 A. I think it was either -- I  
13 think it was in January.

14 Q. Last month?

15 A. Oh, God. Last month. Yeah,  
16 last month.

17 Q. In person?

18 A. In person.

19 Q. Did they give you multiple  
20 drafts of this document?

21 A. I wouldn't say multiple, but  
22 I made sure that it was accurate.

23 Q. Did you make any changes to  
24 the document you were originally  
25 presented with?

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1 HIGHLY CONFIDENTIAL AEO

2 A. No.

3 Q. The first document that you  
4 were presented with, is that the one  
5 that you signed?

6 A. Yes.

7 Q. And nothing was changed  
8 after you reviewed it?

9 A. No.

10 Q. Is that your signature on  
11 the second page?

12 A. Yes, that is my signature.

13 Q. And the last page, is that  
14 the official in Spain who witnessed  
15 your signature?

16 A. Yes.

17 Q. Did you sign page 2 in front  
18 of the person indicated on page 3?

19 A. Yes.

20 Q. Did you present that person  
21 with some form of identification?

22 A. Yes.

23 Q. What form of identification  
24 did you present?

25 A. My passport.

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2 Q. Which passport?

3 A. My British passport.

4 Q. Is that a current British  
5 passport?

6 A. Yes.

7 Q. Did you have a British  
8 passport that expired in 2014?

9 A. Yeah, I can't remember when  
10 it expired, but I think you guys have  
11 a copy as well of my passport. I  
12 don't remember the exact date that it  
13 expired.

14 Q. Not the South African  
15 passport that was stolen?

16 A. The South African passport  
17 is completely irrelevant. You can't  
18 travel on a South African passport.  
19 It's -- you can't go into any other  
20 country bar South Africa, other than  
21 South Africa, on a passport. So I've  
22 hardly used my South African passport  
23 at all.

24 Q. I'm just asking which  
25 passport you showed to the person on

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2 page 3.

3 A. Sorry. My British passport.

4 Q. And it's a British passport  
5 that's current?

6 A. Yes.

7 MR. GUIRGUIS: Asked and  
8 answered.

9 MS. MENNINGER: Just a bit  
10 of a detour.

11 Q. Can I have you take a look  
12 at paragraph 1?

13 A. Yep.

14 Q. Is paragraph 1 true?

15 A. "I am currently over the age  
16 of 18," paragraph 1, yes.

17 Q. And you presently reside in  
18 Spain?

19 A. Yes.

20 Q. Paragraph 2, you state, "In  
21 the summer of 2006, when I was  
22 22 years old and living in New York, I  
23 was introduced to Jeffrey Epstein by a  
24 girl I had met named Natalya  
25 Malyshew."

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2 Is that true?

3 A. Yes.

4 Q. Was it the summer of 2006  
5 when you met Natalya?6 A. Okay, well, it was summer.  
7 End of summer going into fall.8 Q. So when was it, do you  
9 think?10 A. It was fall of 2006. It was  
11 just after the summer.12 Q. So it was the fall of 2006  
13 when you met Natalya?14 A. Well, it was the end of the  
15 summer, so I don't know -- fall or in  
16 the summer or -- it was end of summer,  
17 fall.18 Q. Sometime after you came into  
19 the U.S.?

20 A. Yes, yeah.

21 Q. And do you know when in the  
22 fall of 2006 you met Natalya?23 A. What, you mean the end of  
24 summer/fall slash -- if you really  
25 want to go -- can you define, like,

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1 HIGHLY CONFIDENTIAL AEO  
2 geography lessons? Should we do  
3 geography lessons?  
4 MS. MCCAWLEY: All right.  
5 Hang on a second.  
6 A. Maybe summer? Fall?  
7 Winter? What are your dates here in  
8 New York?  
9 MR. POTTINGER: Can we get  
10 this clear?  
11 MR. PAGLIUCA: Would you  
12 just stop it?  
13 MR. POTTINGER: Do you mind?  
14 Do you mind?  
15 MR. PAGLIUCA: I mind you  
16 talking.  
17 MR. POTTINGER: Do you mind?  
18 MS. MENNINGER: If you want  
19 to enter an objection, please do  
20 so.  
21 MR. POTTINGER: I object.  
22 MS. MENNINGER: What is the  
23 basis of your objection, Mr.  
24 Pottinger?  
25 MR. POTTINGER: Define

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2 summer or fall.

3 MS. MENNINGER: I will do  
4 whatever I want during my  
5 deposition.6 MR. POTTINGER: Define --  
7 define summer or fall.8 MS. MENNINGER: I don't have  
9 to define anything.10 MR. POTTINGER: Define  
11 summer or fall for the client --

12 MS. MENNINGER: All right.

13 MR. POTTINGER: -- and then  
14 we will answer the -- she will be  
15 able to answer the question.16 MS. MENNINGER: I'm going  
17 off the record until you calm  
18 down.

19 Let's go off the record.

20 (Time noted: 3:28 p.m. )

21 (Recess.)

22 (Time noted: 3:30 p.m.)

23 MS. MENNINGER: Go back on  
24 the record.

25 Q. Approximately what month and

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2 day did you meet Natalya Malyshев?

3 A. As I said earlier, I can't  
4 remember what day, but it was end of  
5 summer/fall in the United States. I  
6 can't remember what specific date or  
7 time that was.

8 Q. What month? Any idea?

9 A. It was September.

10 Q. When did you meet Jeffrey  
11 Epstein?

12 A. Shortly after I met Natalya.

13 Q. Was that also in September?

14 A. I guess so. I don't know  
15 the exact date I arrived, so if  
16 someone can provide me with my  
17 passport so I can see my entry date,  
18 maybe that would help.19 So I met Natalya -- if you  
20 look at the date that I arrived in New  
21 York on my passport, I think it's very  
22 clear when I arrived. You've got the  
23 evidence, I'm sure.24 So two weeks after the date  
25 that is on my passport that I arrived

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2 in, I met Natalya. Very soon after I  
3 met Natalya, I was introduced to  
4 Jeffrey Epstein. It was in and around  
5 September. I can't specifically  
6 remember the date, time, season,  
7 whatever.

8 Q. Did you show your passport  
9 to Mr. Pottinger and Mr. Edwards when  
10 you were standing there at the  
11 consulate having the affidavit  
12 notarized?

13 A. I showed my current passport  
14 when I had this signed.

15 Q. Not the passport that  
16 contained dates from 2006?

17 A. My current valid passport.  
18 You can only show a valid passport.

19 Q. Fair enough.

20 So you believe that your  
21 lawyers have produced your current  
22 valid passport to me?

23 A. No --

24 MS. MCCAWLEY: Objection.

25 A. -- they have not produced my

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1 HIGHLY CONFIDENTIAL AEO  
2 current passport. They produced have  
3 my passport during that time frame,  
4 which clearly shows that -- when I  
5 entered the United States.

6 Q. So when your lawyers wrote,  
7 "A copy of nonparty Sarah Ransome's  
8 current passport is attached hereto as  
9 RANSOME 157 to 168, which should be  
10 treated as confidential pursuant to  
11 the party's protective order," do you  
12 believe that to be an accurate  
13 statement?

14 MS. MCCAWLEY: Objection.

15 You're asking her legal  
16 information that she's not privy  
17 to.

18 MS. MENNINGER: There was  
19 nothing legal about that comment.

20 A. Sorry. That makes no sense  
21 to me, please. Can you repeat the  
22 question.

23 Q. I'll do it this way.

24 MS. MENNINGER: Defendant's  
25 Exhibit 4.

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2 (Defendant's Exhibit 4,  
3 RANSOME\_000168, was marked for  
4 identification.)

5 Q. Take a look at Defendant's  
6 Exhibit 4.

7 A. Okay.

8 Q. Just take a look at it. Do  
9 you recognize it?

10 A. Yeah, this is my passport.

11 Q. Do you know which passport  
12 this is?

13 A. This is my old passport.

14 Q. So it's not your current  
15 passport, correct?

16 A. No, it's not my current  
17 passport, because it expired on --  
18 let's have a look here --

19 Q. Can you turn to the  
20 second-to-last page. Sorry.

21 A. Yes, here we go.

22 Q. Does that have a Bates  
23 number? In other words, your name,  
24 RANSOME, with an underscore and then  
25 page numbers after that, that were

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2 placed there by your attorneys.

3 A. Hmm, sorry. I don't  
4 understand.

5 Q. Do you see at the bottom of  
6 that page, your name, RANSOME\_000158?

7 A. Yes.

8 Q. All right. And that's on a  
9 document that is an expired passport?

10 A. Yes.

11 Q. This is not your current  
12 passport?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. No.

16 Q. You have another passport  
17 that's not this passport that's  
18 currently in effect?

19 MR. GUIRGUIS: Objection,  
20 asked and answered.

21 Q. Correct?

22 A. Yes.

23 Q. If I could also have you  
24 take a look at -- and I'll have to  
25 show, if you can see, there are the

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2 passport page numbers --

3 A. Mm-hmm.

4 Q. -- that show up on a  
5 passport.

6 A. Yeah.

7 Q. And these have been put in  
8 some order.9 A. Mm-hmm, the order of my  
10 passport, yes.11 Q. Right. That's not how they  
12 were produced, but that's the order  
13 they're in now.

14 A. Okay.

15 Q. If we could have you turn to  
16 RANSOME 162, which is page 16 of your  
17 passport.18 MR. GUIRGUIS: Is that the  
19 front -- sorry, 162.20 MS. MENNINGER: They're not  
21 in Bates order. They're put in  
22 the order of the passport.

23 THE WITNESS: Oh, yeah.

24 Mm-hmm.

25 MS. MENNINGER: It's page

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2 16.

3 Q. Do you see on that page a  
4 stamp from the Department of Homeland  
5 Security of the U.S., dated  
6 October 19, 2006?

7 A. Mm-hmm.

8 Q. Does that indicate to you  
9 that you were admitted to visit the  
10 U.S. on October 19th of 2006?

11 A. Yes, it does.

12 Q. Do you believe October 19th  
13 is during the summer in the U.S.?14 A. No. I don't see the  
15 relevance.16 Q. What season do you think  
17 October 19th is in the U.S.?18 A. Okay. Well, considering I  
19 arrived in September, October's in  
20 winter. But I arrived in September.21 Q. Okay. Well, do you believe  
22 that you did not enter the U.S. on  
23 October 19th, 2006?

24 A. Well, it's stamped.

25 Q. Does it say "admitted"?

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2 A. "Admitted," yes.

3 Q. Does it say "October 19,  
4 2006"?

5 A. Yes.

6 Q. Does it say "Department of  
7 Homeland Security, U.S. Customs and  
8 Border Patrol"?

9 A. Yes.

10 Q. So you do or do not believe  
11 you were admitted to the United States  
12 on October 19, 2006?

13 A. I flew in and had my  
14 passport stamped after I went on my  
15 trip to London in the UK.

16 Every time you go into a --  
17 as you all know, using your passport,  
18 every time you go into a new country,  
19 if you don't have their passport, you  
20 get a stamp. So if you go in several  
21 times, every time you go into that new  
22 country, it gets stamped.

23 Q. So you think you went on a  
24 trip in October and came back to the  
25 U.S. on October 19th?

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2 A. I obviously went -- I  
3 arrived in New York a day on the 19th  
4 of October.

5 Q. Where were you coming from  
6 on October 19th?

7 A. I can't remember.

8 Q. You have no idea?

9 A. I think it was London. I  
10 made a trip to London.

11 Q. And how long were you in  
12 London in October?

13 A. I can't remember.

14 Q. A week?

15 A. I can't remember.

16 Q. Who paid for that ticket?

17 A. Myself.

18 Q. Did you go with anyone?

19 A. No.

20 Q. Did you have a new 90 days  
21 that began on October 19th?

22 A. Yes. It automatically  
23 starts every time you enter.

24 Q. So in order to be compliant  
25 with that visa, you needed to leave

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2 within 90 days of October 19th?

3 A. That's correct.

4 Q. Do you know which airline  
5 you flew to London in 2006?

6 A. I can't remember.

7 Q. Do you know which class of  
8 service you flew?

9 A. I can't remember.

10 Q. Where is your current  
11 passport right now?

12 A. It is in my hotel room.

13 Here, in -- it's in my hotel room.

14 Q. Got it.

15 Did Natalya fly with you to  
16 London?

17 A. No.

18 Q. Did Jeffrey pay for you to  
19 go to London?

20 A. I can't remember.

21 Q. Do you know whether you had  
22 met Jeffrey before you went to London  
23 in October of 2006?

24 A. I had met Jeffrey by then.

25 Q. Do you have any emails or

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2 anything reflecting your travel plans  
3 on that trip?

4 A. Oh, I think there was a  
5 plane, I think there was a plane  
6 booking or something.

7 Q. For that trip to London in  
8 October of 2006?

9 A. I think so. I would have to  
10 double check.

11 Q. Where would you check?

12 A. Well, I'm trying to go and  
13 find it in my email, my old email  
14 account, where all of my other emails  
15 exchanged between Sarah Kellen and  
16 Lesley Groff are.

17 Q. Do you have any frequent  
18 flyer accounts?

19 A. No.

20 Q. Did your first trip to the  
21 private island in the U.S. Virgin  
22 Islands before or after you went to  
23 London and returned?

24 A. What was the date in October  
25 again? 19th. I can't remember. I

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1 HIGHLY CONFIDENTIAL AEO  
2 mean, I said earlier I can't remember  
3 the first time.

4 Q. In the next sentence you  
5 say, "After that first trip, I  
6 traveled to the island several more  
7 times, usually on one of Jeffrey's  
8 private airplanes, and always at his  
9 direction."

10 What do you mean by "always  
11 at his direction"?

12 A. Well, I wasn't going to go  
13 there on my own, so I would have to be  
14 invited first. I didn't want to just  
15 go chill on my own. It was Jeffrey's  
16 house, so he had to phone me and  
17 invite me before I decided I wanted to  
18 go to his island.

19 Q. So he phoned you, he invited  
20 you, and you decided you wanted to go  
21 to his island.

22 A. No, I had to go to his  
23 island.

24 Q. Why did you have to go to  
25 his island?

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2 A. Because I was frightened of  
3 him.

4 Q. Did Jeffrey ever hit you?

5 A. No, he didn't.

6 Q. Did you ever see Jeffrey  
7 with a weapon?

8 A. No.

9 Q. Have you reviewed any flight  
10 logs?

11 A. No, not that I recall.

12 Q. You've never seen a flight  
13 log?14 A. I've seen one which showed  
15 my name.16 Q. When did you first become  
17 frightened of Jeffrey Epstein?18 A. During my time with him in  
19 New York.

20 Q. What period of time?

21 A. Pretty much soon after I met  
22 him, actually, and he forced the  
23 vibrator on my vagina for an extended  
24 period of time, which considerably  
25 hurt my lady region, actually.

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2 Q. That's when you became  
3 frightened of him?

4 A. Yes, absolutely.

5 Q. You've seen a flight log  
6 with your name on one flight?

7 A. Yes, I have.

8 Q. When did you see that?

9 A. I saw it in January, and it  
10 was to confirm that --

11 MR. GUIRGUIS: I'm going to  
12 object. Hold on.

13 Is this -- if this is a  
14 communication with counsel, you  
15 should understand, any time she  
16 asks you a question, if the  
17 answer is it was with counsel,  
18 then you don't answer.

19 Was this with counsel?

20 THE WITNESS: Yes.

21 MR. GUIRGUIS: Don't answer.

22 MS. MENNINGER: Seeing a  
23 document when you're with counsel  
24 is privileged?

25 MR. GUIRGUIS: I don't know

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2 what your next question is going  
3 to be, so...

4 MS. MENNINGER: I asked her  
5 when she saw the flight logs.  
6 And she said in January, correct?

7 MR. GUIRGUIS: Right. And  
8 then she was about to continue  
9 the answer. I'm fine with the I  
10 saw it in January. That's why I  
11 didn't object when you asked the  
12 question.

13 I'm objecting to her  
14 continuing and caution the  
15 witness not to waive her  
16 attorney/client privilege.

17 Q. Don't tell me anything that  
18 your lawyer said to you.

19 You reviewed the flight log  
20 in January?

21 A. I reviewed one flight log,  
22 which confirmed that I was there.

23 Q. What other documents did you  
24 review?

25 A. No other documents.

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2 Q. In addition to Jeffrey and  
3 Nadia, what other girls did you have  
4 sexual relations with on the island?

5 A. I can't remember their  
6 names.

7 Q. Can you remember any of  
8 their names?

9 A. There were a few.

10 Q. Can you remember any of  
11 their names?

12 A. [REDACTED], Jen -- sorry, I  
13 misunderstood your question. I didn't  
14 have sexual relations with [REDACTED].  
15 Sorry, I misunderstood you.

16 It was Jen, Natalya and  
17 Nadia. And there were a couple  
18 others, I don't remember their names.

19 Q. What are other guests did  
20 you have sexual relations with on the  
21 island?

22 A. It was only those ones.

23 Q. Do you know the ages of any  
24 of the individuals you had sexual  
25 relations with on the island?

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2 A. They were 18, I assumed.

3 Natalya was around my age, was my age.

4 Q. In the next paragraph, you  
5 refer to meeting Ghislaine Maxwell on  
6 one of your visits to the island,  
7 correct?

8 A. Correct.

9 Q. You said, "Watching her  
10 interact with the other girls on the  
11 island, it became clear to me that she  
12 recruited all or many of them to the  
13 island."

14 What do you mean that?

15 A. That she recruited a lot of  
16 the girls.

17 Q. What did you see?

18 A. I saw how she interacted  
19 with all the girls. You know, if you  
20 walk into any -- I mean, common  
21 sensewise, if you walk into a firm,  
22 you kind of know who the boss is.23 You know, all the girls kind  
24 of reported to Ghislaine. Ghislaine  
25 was like the mama bear, if you know

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2 what I mean. She called the shots; we  
3 had to listen to Ghislaine.

4 And Ghislaine was Jeffrey's  
5 right-hand woman, so, you know,  
6 whatever Jeffrey wanted went through  
7 Ghislaine and then filtered through.

8 Q. What did any girl report to  
9 Ghislaine in your presence?

10 MR. GUIRGUIS: Objection.

11 I'm not sure that's -- just  
12 objection to form.

13 Q. You said that the girls  
14 reported to Ghislaine. What did you  
15 see or hear that caused you to say  
16 that?

17 A. Well, it's pretty obvious.  
18 I mean, Ghislaine called the shots.

19 So, for example, when -- I  
20 can't remember specifics, but Natalya,  
21 I think, had an issue. And she had to  
22 speak to Ghislaine if there was ever  
23 an issue.

24 Q. What issue?

25 A. I can't remember

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2 specifically. We always have issues.  
3 Girls have issues. We have period  
4 pains, we've got headaches.

5 You know, we had to look a  
6 certain way for Jeffrey. So if we put  
7 on a little bit of weight or, for  
8 example, if my hairstyle was wrong --  
9 Jeffrey liked girls to look a certain  
10 way.

11 So, for example, there was  
12 one occasion where Jeffrey didn't like  
13 my hair and Ghislaine told me to  
14 change it.

15 So there was -- everyone was  
16 afraid of Ghislaine. All the girls  
17 were afraid of her, so everyone --  
18 Sarah Kellen reported to her. Lesley  
19 Groff reported to her. I don't know  
20 how to tell you.

21 So when I say reporting, I  
22 witnessed with my own two eyes Sarah  
23 Kellen reporting to Ghislaine in front  
24 of me, but I can't remember specifics.  
25 They were talking about girls. I

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2 can't remember the specific  
3 conversation. But every single person  
4 100 percent, 200 percent reported to  
5 Ghislaine. 100 percent.

6 Q. Okay. Great. I appreciate  
7 your certainty.

8 A. Absolutely.

9 Q. So we have Sarah Kellen  
10 having a discussion with Ghislaine  
11 about girls. What other discussions  
12 did you overhear?

13 A. There were various  
14 discussions. We were always talking  
15 about girls. There was a constant  
16 influx of girls. There were so many  
17 girls. There were girls in Miami.  
18 There were guests coming. There  
19 were --

20 It's like, I'm sure if you  
21 go into a hooker's brothel and see how  
22 they run their business, I mean, it's  
23 just general conversation about who's  
24 going to have sex with who and, you  
25 know -- what do you talk about when

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2 all do you is have sex every day on  
3 rotation? I mean, what is there to  
4 talk about?

5 Q. You were in Miami? When did  
6 you go to Miami?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. No, I didn't go to Miami. I  
10 didn't say that.

11 Q. Apart from general  
12 conversation, do you recall any  
13 specifics of any female reporting to  
14 Ghislaine?

15 A. Yes, I saw. And with my own  
16 eyes, I saw how Ghislaine and Lesley  
17 Groff and the other girls reported to  
18 them.

19 If you would like me to  
20 report specific conversations, I  
21 can't. But in my being an adult and  
22 having common sense and a sensible  
23 head on my shoulders, you can quite  
24 quickly work out who is the management  
25 there.

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2 And we were told by Jeffrey  
3 Epstein to listen to Ghislaine. So  
4 Ghislaine was the main right-hand  
5 woman of Jeffrey Epstein. We were  
6 told by Jeffrey Epstein to listen to  
7 Ghislaine.

8 Q. When did Jeffrey Epstein  
9 tell you that?

10 A. I can't remember the exact  
11 time, date or where I was standing, on  
12 which pavement or crack. But it was  
13 around the time that I met Ghislaine.

14 Q. Which was on the island?

15 A. I can't remember what date,  
16 time, pavement, where I was standing.  
17 But I was told during around the time  
18 I met Ghislaine that I had to listen  
19 to Ghislaine.

20 Q. By Jeffrey?

21 A. By Jeffrey. And every  
22 single other girl that I've ever met  
23 with Jeffrey.

24 Q. And we know three names, but  
25 that's it?

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2 A. Those are three names that I  
3 remember, but I met -- I met lots of  
4 girls. Lots.

5 Q. Okay.

6 A. Yeah.

7 Q. What activities was  
8 Ghislaine Maxwell in charge of?

9 A. In terms of -- can you  
10 explain activities, please?

11 Q. I'm actually just looking at  
12 your affidavit on paragraph 3, so why  
13 don't you take a look at that.

14 A. Activities. Activities. So  
15 when we had to go to the island, when  
16 we had to go see Jeffrey in New York,  
17 when we had to go to his mansion.

18 You know, we saw Jeffrey  
19 pretty regularly. I was on rotation  
20 pretty much every day, so -- amongst  
21 other girls.

22 So Ghislaine also called  
23 me -- she also called the other  
24 girls -- when Jeffrey wanted his  
25 massage. So there was an occasion

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2 that I didn't want to go, and she got  
3 angry with me because I didn't want to  
4 give Jeffrey a massage.

5 Q. When was that?

6 A. It was on one of my -- one  
7 of my stays on the island. I can't  
8 remember what specific date or what  
9 specific time.

10 Q. How many times were you on  
11 the island with Ghislaine?

12 A. I can't remember  
13 specifically.

14 Q. More than once?

15 A. Yeah.

16 Q. More than twice?

17 A. I can't remember. I also  
18 saw her in New York quite a lot, so --  
19 I mean, this isn't just based on the  
20 island. I spent just as much time  
21 with Jeffrey and Ghislaine in New  
22 York, so we can't just concentrate on  
23 the island, please.

24 Q. Did you believe Ghislaine  
25 was living in New York in January of

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2 2007?

3 A. I don't know where the hell  
4 Ghislaine lived, to be honest.

5 Q. But you saw her regularly in  
6 January of 2007?

7 MR. GUIRGUIS: Objection.

8 MS. MCCAWLEY: Objection.

9 A. Regularly, what's regularly?  
10 I saw her a few times. I don't know  
11 where she was living. I tried to  
12 actually not spend -- well, I tried to  
13 spend as little time with her as  
14 possible because every time I saw her  
15 on the island, she would call me to  
16 give Jeffrey a massage, so...

17 Q. You saw her more than once  
18 on the island and you saw her a few  
19 times in New York. Did you see her  
20 anywhere else?

21 MR. GUIRGUIS: Objection.

22 MS. MCCAWLEY: Objection,  
23 mischaracterizes testimony.

24 A. No.

25 Q. In New York, you saw her at

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2 Jeffrey's office. Did you see her  
3 anywhere else in New York?

4 A. I can't remember. I saw  
5 them, I spent a lot of time with them,  
6 so...

7 Q. How much time did you spend  
8 with Ghislaine?

9 A. Enough.

10 MR. GUIRGUIS: Objection.

11 That's vague.

12 A. Enough time. I mean, how  
13 long is a piece of string? I was here  
14 for a certain amount of time, and in  
15 that time, the majority of the time I  
16 spent with Jeffrey Epstein being  
17 involved with his pedophilia -- I  
18 mean, how much time have you spent  
19 with him? I don't know. It wasn't a  
20 lot of time, because I couldn't stand  
21 the woman and she was a bully and no  
22 one liked her, so no one really went  
23 out of their way to spend time with  
24 her.

25 So I didn't spend a lot of

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2 time with her because she's a  
3 particularly unpleasant person. And  
4 when I did spend time with her, it was  
5 either directing me to massage Jeffrey  
6 or her showing me how to massage  
7 Jeffrey, or I spent a lot of time with  
8 her on the island.

9 Yeah, so how much time did I  
10 spend with Ghislaine in total of  
11 hours? I can't recall because it was  
12 ten years ago. I mean, how many hours  
13 did I spend with Jeffrey? I mean,  
14 what a silly question.

15 Q. How many days did you see  
16 Ghislaine?

17 A. Don't know.

18 Q. Less than ten or more than  
19 ten?

20 A. I can't remember.

21 Q. Less than five or more than  
22 five?

23 A. Can't remember.

24 Q. You indicate that many girls  
25 you saw appeared to be young

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2 teenagers. Where did you see young  
3 teenagers?  
4 A. It says they appeared to be  
5 teenagers. All the girls I saw looked  
6 young.

7 Q. Okay. Where did you see  
8 girls who appeared to be young  
9 teenagers?

10 A. On the island and in New  
11 York.

12 Q. Describe for me a young  
13 teenager that you saw.

14 MR. GUIRGUIS: Objection,  
15 mischaracterizes testimony.

16 A. So I never said I saw a  
17 teenager. They appeared to look like  
18 teenagers, okay? [REDACTED] was -- I try  
19 to look at [REDACTED]. I don't know how  
20 old [REDACTED] is, but she looked young.  
21 And I'm sure you can agree, as a mom,  
22 in the photos, that she looks pretty  
23 young for an old man to be bonking.  
24 So she looks really young. She looks  
25 younger than me.

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2 Q. Did you see her bonk  
3 someone?

4 A. No, but she told me. She  
5 told me and Nadia that they abused her  
6 on the island.

7 Q. Nadia said they abused who  
8 on the island?

9 MR. GUIRGUIS: Objection,  
10 mischaracterizes testimony.

11 That's not what she said.

12 A. [REDACTED] said that Jeffrey  
13 and Nadia had abused her.

14 Q. Okay. And do you have any  
15 way to reach [REDACTED]?

16 A. I haven't spoken to her. I  
17 don't -- I just know her first name.

18 Q. You said you recall seeing  
19 "a particularly young, thin girl who  
20 looked well under 18," and you recall  
21 asking her her age.

22 When did you see this  
23 particularly young, thin girl who  
24 looked well under 18 and you recall  
25 asking her age?

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2 A. It was on the trips. I  
3 think you've got the photos. [REDACTED]  
4 is in the photos. So it was that trip  
5 in December.

6 Q. Did you take a photo of the  
7 young, thin girl who looked well under  
8 18?

9 A. I think I did take a photo  
10 of her. I don't have any more photos  
11 of her of my own.

12 Well, I have photos of her.  
13 You've got the photos.

14 Q. So the person --

15 A. I've given you all the  
16 photos that I have.

17 Q. The person that you wrote  
18 here was "a particularly young, thin  
19 girl who looked well under 18" is  
20 reflected in photographs you've  
21 produced in this case?

22 A. That's correct.

23 Q. And do you know her name?

24 A. Sorry, can you just repeat  
25 that? Didn't I just answer this

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2 question?

3 Yeah, that's [REDACTED] who I  
4 was particularly concerned about,  
5 about her age, in the photos that I  
6 have supplied with -- you with, with  
7 me in them with [REDACTED].8 Q. So in your affidavit in  
9 paragraph 3 where you talk about "a  
10 particularly young, thin girl who  
11 looked well under 18," you are  
12 referring to [REDACTED]?

13 A. Yes.

14 Q. And you said you later  
15 learned she was a [REDACTED]

16 A. That's correct.

17 Q. How did you learn she was a  
18 [REDACTED]19 A. Because she told me. And  
20 she told me Jeffrey Epstein was  
21 funding her [REDACTED] [REDACTED]

22 Q. And where was her [REDACTED]

23 [REDACTED]

24 A. I don't know.

25 Q. When did she tell you this?

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2 A. During that December trip.

3 Q. Was that the only trip you  
4 took with her?

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

6 I think there was another trip, but I  
7 can't remember.

8 Q. Did you ever see her name on  
9 a flight log?

10 A. No.

11 Q. Was she on the plane with  
12 you?

13 A. I can't -- I can't remember.  
14 I can't remember. Yeah, I just  
15 remember [REDACTED] on the island.

16 Q. Other than her telling you  
17 she was a [REDACTED] did she tell you  
18 anything else about herself?

19 A. Yeah, you know, I think she  
20 came from quite a tough background.

21 Q. What did she say?

22 A. Well, I can't remember the  
23 specifics, but I remember that -- I  
24 don't know if she had issues with her  
25 parents -- I don't know. She was a

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2 bit of a -- you know, she was a -- I  
3 was worried about her.

4 Q. What did she say to cause  
5 you to be worried about her?

6 A. Well, I first met her -- she  
7 was new to Jeffrey Epstein's list of  
8 girls in December. And when I first  
9 met her, she was a really bubbly girl  
10 and -- I mean, she was young. She was  
11 inexperienced. She -- she was frail.  
12 And she changed quite quickly after  
13 that first trip.

14 Q. How many trips did you take  
15 with her?

16 A. I think it was more than  
17 one. I can't remember. I saw her a  
18 lot.

19 Q. Where did you see her?

20 A. Oh, it was either New York  
21 or the island. I mean, I can't  
22 remember.

23 Q. In New York, where did you  
24 see her?

25 A. I think we met -- like we

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2 all met a couple times in New York.

3 We all kind of knew each other.

4 Q. Did you ever see her [REDACTED]

5 A. No.

6 Q. Did she live in an apartment  
7 that you went to?

8 A. I can't remember about her  
9 living arrangements.

10 Q. Do you know where her [REDACTED]  
11 [REDACTED] was?

12 A. No.

13 Q. When did you ask to see her  
14 passport?

15 A. When we shortly arrived to  
16 the Virgin Islands, she looked  
17 particularly young. And you know what  
18 girls are like with passport -- with  
19 passport pictures. They don't -- they  
20 get embarrassed about their passport  
21 pictures.

22 And she was quite cagey  
23 about her passport, so she didn't show  
24 me. I don't know whether that -- I  
25 don't know. She just didn't show me.

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2 Q. Did she say why she wasn't  
3 showing it to you?4 A. She said it was because she  
5 was embarrassed about the picture.6 Q. Were you living in the same  
7 room with her on the island?8 A. Yeah, we stayed in the same  
9 room.10 Q. Did you ever attempt to look  
11 at her passport when she wasn't there?

12 A. No.

13 Q. Did you ever call any  
14 authorities about having seen this  
15 young, thin girl who looked well under  
16 18?

17 A. No.

18 Q. In the fourth paragraph, you  
19 described being lent out to Jeffrey's  
20 friends in New York.21 Which friends of Jeffrey's  
22 were you lent out to to have sex?

23 A. Alan Dershowitz.

24 Q. Who else?

25 A. Nadia. All the girls that

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2 were involved, really. I had to have  
3 sex with them, so...

4 Q. Well, what do you mean by  
5 lent out?

6 A. Lent out as in -- so I was  
7 one of the girls that regularly --  
8 that Jeffrey regularly asked to see  
9 sexually.

10 And what my description was  
11 of being lent out is when -- it's  
12 almost like Jeffrey's quite possessive  
13 of his girls. He's -- you know, he  
14 lends them out.

15 He samples the girls, he has  
16 friends come over to New York or the  
17 island and they -- they get to see who  
18 all the girls are around Jeffrey, and  
19 they get to pick one which they want  
20 to be with.

21 Q. So you were with Jeffrey and  
22 a number of other females in New York  
23 when a person, a friend would come in,  
24 Alan Dershowitz would come in and look  
25 at all of the girls and choose one?

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2 MS. MCCAWLEY: Objection.

3 MR. GUIRGUIS: Objection,

4 mischaracterizes testimony.

5 MS. MENNINGER: I'm asking a

6 question.

7 MR. GUIRGUIS: I'm objecting

8 to your question.

9 A. So let me give you a

10 specific example of that. So, for

11 example, there was an occasion where I

12 and some of the other girls were on

13 the island. So a specific occasion

14 was when Sergey -- I don't know his

15 surname, but he owns Google or

16 whatever, and he came with his

17 fiancée.

18 So, you know, you got a

19 table with Jeffrey Epstein of lots of

20 women -- girls, women, whatever --

21 beautiful girls, and you've got

22 friends joining him. And friends

23 popped over all the time.

24 So I had other -- there were

25 other males that visited Jeffrey on

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1 HIGHLY CONFIDENTIAL AEO  
2 the island. I don't know who they  
3 are. I can't remember their names.  
4 But, yeah. I mean, he  
5 didn't -- he didn't line them up and  
6 go, hey, boys, pick which vagina you  
7 want. He didn't do it that blatantly.

8 But they had spent time with  
9 the girls during a lunch on the  
10 island -- yeah, I mean, they -- his  
11 friends would spend time with us.

12 Q. Okay. In paragraph 4, where  
13 you say, "At his townhouse, I was also  
14 lent out by him to his friends and  
15 associates to have sex."

16 What do you mean by that  
17 sentence?

18 A. Well, I mean, it's quite  
19 obvious with the incidents -- well,  
20 the incident that happened with Alan.  
21 So I would classify that as being lent  
22 out. I didn't willingly go, hey,  
23 Alan, let's have some fun, because no  
24 one on the planet would say that to  
25 Alan.

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2 Q. So you say "lent out by him  
3 to his friends and associates."4 Who are the friends and  
5 associates that you were lent out to?6 MR. GUIRGUIS: Objection,  
7 asked and answered.

8 A. Alan Dershowitz and Nadia.

9 The girls that I mentioned. There  
10 were other girls that I had sexual  
11 intercourse with, but I can't remember  
12 their names.

13 Q. Were there any other men?

14 A. No, there weren't any other  
15 men.

16 Q. Prince Andrew?

17 A. No.

18 Q. [REDACTED] [REDACTED] [REDACTED] ?

19 A. No, no, I don't know that.

20 Q. Bill Richardson? Yes? No?

21 A. No. That I would be lent  
22 out to have sex with?

23 Q. Yes.

24 A. No, no.

25 Q. Tom Pritzker?

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2 A. No.

3 Q. Marvin Minsky?

4 A. No.

5 Q. Were you paid money after

6 you had sex with Alan Dershowitz?

7 A. No.

8 Q. Were you paid money after

9 you had sex with Nadia?

10 A. No.

11 Q. Were you paid money after

12 you had sex with Natalya?

13 A. No.

14 Q. Were you paid money after

15 you had sex with any of the other

16 girls --

17 A. No.

18 Q. -- of names you can't

19 remember?

20 A. I was only ever paid to --

21 when I had sex with Jeffrey himself.

22 Q. In the course of massage?

23 A. Yes.

24 Q. Did you ever have sex with

25 Jeffrey not in a massage context?

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1 HIGHLY CONFIDENTIAL AEO  
2 A. Yeah, we -- yeah. He was  
3 really intimate all the time. We  
4 had -- multiple times. I can't tell  
5 you how many times I've slept with  
6 Jeffrey. I mean, we were on rotation.  
7 Every single day, it was -- sometimes  
8 twice a day I was called.

9 You know, Ghislaine, Sarah  
10 Kellen -- you know, it was -- yeah. I  
11 mean, how -- we were on rotation  
12 pretty much the whole time I was here.

13 Q. And when you say you were on  
14 rotation, you mean you were having sex  
15 with Jeffrey multiple times per day?

16 A. No. As in when I was  
17 finished, another girl was called by  
18 Ghislaine. And when they had  
19 finished, another girl was called.

20 Q. How do you know that another  
21 girl was called by Ghislaine?

22 A. Because I was there, and I  
23 saw it and heard it with all my  
24 senses. I saw Ghislaine call another  
25 girl, and she called me herself, to go

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1 HIGHLY CONFIDENTIAL AEO  
2 give Jeffrey Epstein a sexual massage.

3 Q. What do you mean by call? I  
4 guess I'm thinking like telephone.  
5 That may be my --

6 A. No. As in going up to the  
7 person and going, Jeffrey wants to see  
8 you in his bedroom, which meant it's  
9 your turn to be abused. That kind of  
10 thing.

11 Q. And this is on the island?

12 A. This is on the island.

13 Q. You heard -- as soon as you  
14 were done with Jeffrey, you heard  
15 Ghislaine go up to another girl and  
16 say, it's your turn with Jeffrey?

17 A. So every single day, I  
18 mean -- so I don't know how quickly  
19 Jeffrey's sperm bank fills up. I  
20 mean, I know guys can normally cum  
21 once or twice a day, but Jeffrey's not  
22 a normal person.

23 So, I mean, our rotation  
24 changed every day that specific trip  
25 we had in December.

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1 HIGHLY CONFIDENTIAL AEO  
2 So, for example, I would be  
3 called. Maybe a couple hours when  
4 Jeffrey had a little, you know, break,  
5 another girl was called, [REDACTED].  
6 Then another girl was called. Every  
7 single day.

8 We tried to hide on  
9 different -- like, so we wouldn't have  
10 to get called. We'd generally have to  
11 sit in the main area. There was like  
12 a big pool, the main seating area.  
13 There was a big table. We'd sit there  
14 and do kind of art on the table, and  
15 we always had to be around. We  
16 weren't allowed to go very far on the  
17 island.

18 We always had to report to  
19 Ghislaine and Jeffrey and tell them if  
20 we were going down to the beach to  
21 swim because they had an inflatable  
22 trampoline. So they -- I mean, we  
23 always had to tell Ghislaine and  
24 Jeffrey where we were at all times.

25 Q. On the island?

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1 HIGHLY CONFIDENTIAL AEO

2 A. On the island, yeah.

3 Q. In New York -- strike that.

4 How many times a day, to

5 your knowledge, did Jeffrey Epstein  
6 have sex?7 A. To my knowledge, from what I  
8 saw and what I've witnessed -- I don't  
9 know what he did when I wasn't  
10 there -- up to about three, four times  
11 a day.12 Q. So you had sex with him  
13 three or four times a day?

14 MS. MCCAWLEY: Objection.

15 A. No.

16 Q. I'm sorry. You said to your  
17 knowledge, what you witnessed. I'm  
18 trying to understand what you mean.19 A. So as soon as I slept with  
20 Jeffrey, a certain time would go by.  
21 He maybe had a coffee. And then there  
22 was a specific occasion where then  
23 [REDACTED] was called to go and do that  
24 for Jeffrey.

25 Q. And you were not in the room

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1 HIGHLY CONFIDENTIAL AEO

2 when [REDACTED] was with Jeffrey?

3 A. No, but I was certainly  
4 there afterwards, because she was  
5 forced to have sex with Nadia and  
6 Jeffrey Epstein.

7 Q. That happened?

8 A. Yes. And she had never had  
9 a female experience before and she was  
10 very upset, very upset.11 Q. So you didn't personally see  
12 it, but you talked to [REDACTED] and saw  
13 her afterwards?14 A. Well, I don't think the  
15 girls, when they were called, were  
16 making cups of tea with Jeffrey in his  
17 room. So -- and when a girl comes out  
18 crying and I know that I've been  
19 sexually abused, it's quite safe to  
20 assume.21 And when that girl tells you  
22 she's being forced to have sex with  
23 Jeffrey Epstein and Nadia, you know,  
24 it's there, isn't it.

25 Q. So she told you?

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1 HIGHLY CONFIDENTIAL AEO  
2 A. Yes, she told me. And with  
3 my own intelligence, in my -- you  
4 know, I can see with my own senses. I  
5 can hear things, see things. It's  
6 quite obvious what was going on.

7 MS. MENNINGER: I need a  
8 small break.

9 (Time noted: 4:17 p.m.)

10 (Recess.)

11 (Time noted: 4:28 p.m.)

12 Q. On Defendant's Exhibit 3 in  
13 the last paragraph, you describe  
14 having had sex with Alan Dershowitz,  
15 correct?

16 A. Correct.

17 Q. You say in the last sentence  
18 that you recall "specific key details  
19 of his person."

20 What specific key details of  
21 his person do you recall?

22 A. You know, I recall his  
23 appearance. You know, I'd met him,  
24 you know, twice beforehand. So in  
25 terms of specific key details, I can

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1 HIGHLY CONFIDENTIAL AEO

2 describe how he looked.

3 Q. How did he look?

4 A. He was, as I've explained --  
5 described earlier, quite -- quite an  
6 elderly man, wore glasses, quite  
7 pasty, pasty-skinned. Not well, I  
8 assumed, not at all well. He wasn't  
9 well, W-E-L-L. Like, he wasn't a --  
10 he wasn't -- he wasn't a healthy  
11 person.

12 Q. And do you recall whether he  
13 had a mustache?

14 A. I can't -- I can't recall if  
15 he had a mustache, no.

16 Q. Which of those that you just  
17 described are the key details you are  
18 referring to in paragraph 4?

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

21 A. As I've described. I  
22 mean...

23 Q. Pasty skin?

24 A. Pasty skin, wrinkly. I  
25 didn't -- I tried to pay as little

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1 HIGHLY CONFIDENTIAL AEO  
2 attention to him as possible. During  
3 that session, I was completely  
4 overwhelmed. I -- it completely took  
5 me by surprise, that incident, and I  
6 was exceptionally upset by what was  
7 going on because I felt that I had  
8 been coerced beforehand, that it had  
9 been prior arranged to me arriving  
10 there.

11 Q. Can you describe any other  
12 specific key detail of his person that  
13 you haven't already mentioned?

14 A. I can't remember specific  
15 ones. It was -- I just tried to just  
16 get it done as soon as possible to get  
17 out of there. I couldn't wait to get  
18 out of there quick enough, to be  
19 honest.

20 Q. Did you tell your attorneys,  
21 I recall specific key details of this  
22 person?

23 A. I think I've just described  
24 that key details of this person.

25 Q. Did you say those words to

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1 HIGHLY CONFIDENTIAL AEO  
2 your attorneys when you drafted this?

3 MR. GUIRGUIS: Objection,  
4 asked and answered.

5 MS. MCCAWLEY: Objection.

6 A. I do recall specific  
7 details, which I've given.

8 Q. And they're the ones you've  
9 already given?

10 A. I don't -- as I specified,  
11 this was a coerced event that took  
12 place. I was extremely upset. I did  
13 not want to have sexual intercourse  
14 with Alan.

15 I did not -- I don't -- I  
16 don't remember specific -- I don't  
17 remember specific things. I remember  
18 Nadia -- me paying particular  
19 attention to Nadia because I didn't  
20 want Alan touching me, so it was -- as  
21 I said, it was a traumatic experience.

22 I don't remember the finer  
23 details of Alan Dershowitz's private  
24 parts or any other thing. I tried to  
25 spend as little time as possible

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1 HIGHLY CONFIDENTIAL AEO  
2 touching Alan, as I'm sure you can  
3 imagine.

4 Q. How was it coerced?

5 A. It was coerced in the sense  
6 that when I arrived there, Alan  
7 Dershowitz was there and Nadia was  
8 there. It was quite clear to me what  
9 their intention was after me arriving  
10 there.

11 Q. There being where?

12 A. Jeffrey's New York  
13 apartment.

14 Q. When you arrived at  
15 Jeffrey's New York apartment, Alan was  
16 already there?

17 A. Yes.

18 Q. And Nadia was already there?

19 A. Yes.

20 Q. What were the specific key  
21 details of the sex acts that you can  
22 remember that you have not already  
23 described?

24 A. There was cunnilingus  
25 involved, masturbation.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Who performed cunnilingus on  
3 who?

4 A. We all performed cunnilingus  
5 on each other.

6 Q. So did anyone perform  
7 cunnilingus on Mr. Dershowitz?

8 A. Is that the same as girls  
9 and boys? Yeah, same definition.

10 Q. Did you perform cunnilingus  
11 on Nadia?

12 A. Yes.

13 Q. Did she perform it on you?

14 A. Yes.

15 Q. Did Mr. Dershowitz perform  
16 it on you?

17 A. Yes.

18 Q. Did he perform it on Nadia?

19 A. Yes.

20 Q. And any other specific key  
21 details of the sex acts you can  
22 describe?

23 A. There was a lot of touching,  
24 fondling, yeah.

25 Q. When you say Professor

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1 HIGHLY CONFIDENTIAL AEO  
2 Dershowitz's name, you say Dershowitz  
3 with a V, phonetically, correct?

4 A. I'm slightly dyslexic and  
5 I'm terrible with names. So it's  
6 known that I've always struggled with  
7 pronunciations, especially because of  
8 my accent as well.

9 Q. Do you believe you were  
10 introduced to him as Dershowitz with a  
11 V?

12 A. I was introduced to him as  
13 Alan.

14 Q. Did you ever hear anyone say  
15 his last name?

16 A. Yes.

17 Q. Did you hear those people  
18 say it with a V?

19 A. I can't recall the exact  
20 pronunciation of the tongue, but the  
21 way my ears hear words -- perhaps you  
22 can contact my university. I don't --  
23 I have difficulty with names and I'm  
24 slightly dyslexic, so...

25 MS. MENNINGER: Okay. Can

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1 HIGHLY CONFIDENTIAL AEO  
2 you mark this as Defendant's  
3 Exhibit 5.  
4 (Defendant's Exhibit 5, jury  
5 trial demand, was marked for  
6 identification.)

7 MS. MCCAWLEY: Because I  
8 forget earlier, just for the  
9 record, the plaintiff in the case  
10 is going to mark the deposition  
11 as confidential.

12 MS. MENNINGER: Yes. I  
13 discussed it with the court  
14 reporter, and I think he already  
15 has, but if not, he will do it.

16 MS. MCCAWLEY: Okay.

17 Q. Can you take a look at  
18 Defendant's Exhibit 5.

19 A. Yes.

20 Q. Have you seen this document  
21 before?

22 A. Yes.

23 Q. Did you review it before it  
24 was filed?

25 A. Yes.

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1 HIGHLY CONFIDENTIAL AEO

2 Q. What do you understand this  
3 document to be?

4 A. This is a complaint against  
5 Jeffrey Epstein.

6 Q. Anyone else?

7 A. Ghislaine Maxwell, Sarah  
8 Kellen, Lesley Groff, Natalya  
9 Malyshew.

10 Q. And this is a complaint that  
11 you authorized be filed on your  
12 behalf?

13 A. That's correct.

14 Q. And at the end of this  
15 complaint, you ask for money to be  
16 awarded to you, correct?

17 A. Can you refer me to the  
18 specific page, please?

19 Q. Well, do you understand that  
20 you are asking for money to be awarded  
21 to you?

22 A. Can you tell me which page  
23 that's on, please.

24 Q. I'm just asking your  
25 understanding.

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2 A. Nothing's been promised to  
3 me about money.4 Q. Were you seeking money when  
5 you authorized this complaint to be  
6 filed on your behalf?7 A. No. I just wanted a  
8 pedophile behind bars, really, and for  
9 him to stop abusing young girls.10 Seeing as I'm going to be a  
11 parent myself, I can't really live  
12 with myself, knowing that there's a  
13 pedophile with my kids on the planet.  
14 So as a responsible human being, I  
15 thought that I would come forward.16 Q. So your hope in filing this  
17 lawsuit was not to recover any money?18 A. No. I want Jeffery and  
19 Ghislaine and all of these people  
20 behind bars so I can then visit them  
21 in jail.22 Q. In paragraph 36 of this,  
23 which is on page 11, can I have you  
24 review that paragraph.

25 A. Yep.

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2 Q. Do you know what that  
3 paragraph refers to?

4 A. Yes, I do.

5 Q. What is the basis for your  
6 statement that "Defendant Malyshев  
7 reported to Defendants Kellen, Groff  
8 and Maxwell, and was paid for her  
9 recruitment of young females,  
10 including the recruitment of  
11 plaintiff"?

12 A. She told me face to face, in  
13 person, that she was paid by Jeffrey.

14 And Jeffrey also offered to  
15 pay me \$5,000 to find him a new  
16 18-year-old model PA to help him with  
17 his multi-billionaire corporation,  
18 because she's that qualified.

19 Q. So when you say recruitment  
20 of young females, you're referring to  
21 people who are 18?

22 A. Yes.

23 Q. And at the time you were in  
24 touch with Ms. Malyshев, you were 22,  
25 correct?

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2 A. That's correct.

3 Q. Apart from what Ms. Malyshew  
4 told you, do you have any other basis  
5 for knowing that Malyshew reported to  
6 Kellen, Groff and Maxwell and was paid  
7 for her recruitment of young females,  
8 including you?

9 A. What she told me.

10 Q. Apart from what she told  
11 you, do you have any other basis for  
12 that?

13 A. Well, I saw it with my own  
14 eyes. I was a witness.

15 Q. What did you witness?

16 A. I witnessed the same thing  
17 all the other girls did, the same  
18 thing I had to do, was go and report  
19 to Sarah Kellen, Lesley Groff and  
20 Ghislaine.

21 Ghislaine was the main lady.  
22 Sarah Kellen and Lesley Groff did all  
23 the admin, like booking flights, like  
24 what a normal PA does.

25 Do you understand?

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1 HIGHLY CONFIDENTIAL AEO

2 Q. Well, did you get paid for  
3 recruitment of young females?

4 A. Jeffrey Epstein told me that  
5 he would give me money to find him a  
6 PA for him in South Africa.

7 Q. You did not find a PA,  
8 correct?

9 A. Absolutely not.

10 Q. And you did not get paid for  
11 recruitment of young females, correct?

12 A. Absolutely not.

13 Q. You say in paragraph 37 that  
14 you were introduced to Epstein by  
15 Malyshев, correct?

16 A. Correct.

17 Q. And Epstein confirmed to you  
18 that he would use his wealth and  
19 influence to have you admitted into  
20 FIT, correct?

21 A. That's correct.

22 Q. What did Epstein say to you  
23 to confirm that? He said, I will use  
24 my wealth and influence to have you  
25 admitted, or some other words?

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1 HIGHLY CONFIDENTIAL AEO  
2 A. I can't remember the exact  
3 conversation, but from the very  
4 beginning Jeffrey and Ghislaine knew  
5 what my intentions were and why I  
6 wanted to stay in New York, which was  
7 to get a degree.

8 Q. Did Epstein say something to  
9 you about a similar institute of  
10 higher learning offering a curriculum  
11 of fashion industry training?

12 A. No. I was pretty adamant  
13 that I wanted to go to FIT. It's one  
14 of the best fashion schools, so...

15 Q. In paragraph 38, you say  
16 Maxwell told you that you would "need  
17 to provide Epstein with body massages  
18 in order to reap the benefits of his  
19 and her connections."

20 What did Ms. Maxwell say to  
21 you in regards to giving body massages  
22 in order to reap benefits of her  
23 connections?

24 A. Well, the fact that she told  
25 me I had to weigh 52 kilograms in

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1 HIGHLY CONFIDENTIAL AEO  
2 order for them to pay for my  
3 education, that was pretty -- that was  
4 one of the conversations that she had  
5 with me.

6 Q. Does that have something to  
7 do with body massages?

8 A. Can you repeat -- let me  
9 read the question again.

10 So I would just like to  
11 clarify, body massages meant sex,  
12 okay? That's like a key word for sex.  
13 So as soon as you stop having sex with  
14 Jeffrey and his friends and his girls,  
15 you're out, because otherwise there's  
16 no reason for you to be associated  
17 with Jeffrey, because you're just  
18 there to have sex with him, so...

19 Q. Can I direct your attention  
20 to the first sentence in paragraph 38,  
21 and can you just explain to me when  
22 that conversation took place.

23 MR. GUIRGUIS: Objection,  
24 form.

25 A. First time I met Ghislaine,

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2 from the very first beginning.

3 Q. What did Ghislaine say to  
4 you?

5 A. I can't remember the  
6 specific conversation. But the fact  
7 that she helped me refine my massage  
8 skills to satisfy Jeffrey, I think  
9 it's pretty self-explanatory.

10 Q. The one you described  
11 earlier?

12 A. The one I described earlier.

13 Q. Okay. In the second  
14 sentence, where it says, "Maxwell and  
15 Epstein also threatened plaintiff that  
16 while they had the ability to advance  
17 her education and career, they also  
18 had the ability to make sure that she  
19 would obtain no formal education or  
20 modeling agency contracts if she  
21 failed to provide the sexual favors  
22 desired by defendant Epstein or abide  
23 by the instructions given her by  
24 defendants Epstein and Maxwell."

25 A. Mm-hmm.

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2 Q. What did Ms. Maxwell say to  
3 you that gave rise to this particular  
4 statement?

5 A. Well, the fact that she used  
6 to personally call me herself to give  
7 Jeffrey sexual massages. Not body  
8 massages; sexual massages. It should  
9 be rephrased.

10 I mean, it was pretty  
11 obvious. I mean, the whole weight  
12 thing. I tried to swim off the  
13 island. I tried to escape from an  
14 island during the evening to try and  
15 escape from her because if I didn't  
16 lose weight, they would cut me out of  
17 their -- financially off. I would  
18 lose the place that I was staying at.  
19 I would lose my education. You name  
20 it.

21 They bullied me with  
22 everything, just like they did with  
23 the other girls.

24 Q. In paragraph 38, you say,  
25 "Maxwell and Epstein also threatened

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2 plaintiff."

3 What was the threat that was  
4 made to you by Maxwell?

5 MS. MCCAWLEY: Objection,  
6 asked and answered.

7 A. The fact that I would lose  
8 everything that they promised me.

9 They -- they were really naughty. You  
10 know, they took girls from very  
11 underprivileged families. They gave  
12 them accommodation, they gave them  
13 food, gave them money for  
14 transportation, you know, private  
15 planes, etcetera, etcetera.

16 So if I didn't have sex with  
17 Jeffrey, I would be homeless and  
18 starving in New York, so -- and my  
19 dream of getting a full-time education  
20 at one of the top fashion institutes  
21 in the world would be diminished.

22 And that's what he held over  
23 my head, exactly like he did with  
24 [REDACTED] and the other girls. He was  
25 paying for all of their educations.

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1 HIGHLY CONFIDENTIAL AEO  
2 Q. How do you know that?  
3 A. Because they were telling  
4 me. It was common knowledge amongst  
5 all the girls. No other girl would be  
6 there willingly just to have sex with  
7 Jeffrey.

8 Q. In paragraph 40, you say,  
9 "Maxwell instructed plaintiff how to  
10 massage Epstein using the techniques  
11 that he preferred."

12 A. Correct.

13 Q. Is that the accident you  
14 described earlier on the island?

15 A. There were many times that  
16 she gave me massage techniques to help  
17 refine my techniques. Jeffrey Epstein  
18 was all about massages and the  
19 techniques. He liked as many girls  
20 touching him as possible all the time.

21 So there was more than one  
22 occasion that Ghislaine showed me how  
23 to massage him. It could have been on  
24 that specific trip or the other one.

25 I'm not quite sure day,

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1 HIGHLY CONFIDENTIAL AEO  
2 time, what seat I was sitting in, what  
3 color the seat it is, but she on more  
4 than one occasion showed me how to  
5 massage Jeffrey and how to get out the  
6 extreme knots in his body. Because  
7 everyone knows about his knots and how  
8 he likes them to pop and, yeah, the  
9 specific techniques that he likes.

10 Q. The next sentence reads,  
11 "During plaintiff's first massage,  
12 defendant Epstein converted it into a  
13 sexual act..." and it goes on.

14 Your first massage that  
15 defendant Epstein converted into a  
16 sexual act was prior to you meeting  
17 Ms. Maxwell, correct?

18 A. Yes.

19 MS. MENNINGER: I'm going to  
20 show you Defendant's Exhibit 6,  
21 which are some photographs.

22 (Defendant's Exhibit 6,  
23 Bates stamped Ransome\_000017, was  
24 marked for identification.)

25 Q. Do you recognize the

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1 HIGHLY CONFIDENTIAL AEO  
2 photographs contained in Defendant's  
3 Exhibit 6?  
4 A. Yes, I do.  
5 Q. What are they?  
6 A. They are photos of Jeffrey's  
7 island and the trip in December.  
8 Q. Who took those photos?  
9 A. Jean Luc took these specific  
10 photos.  
11 Q. And when you were asked to  
12 provide these to us, where did you  
13 locate them?  
14 A. I had a disk that Jean Luc  
15 had given me as a present and memento  
16 of that holiday.  
17 Q. Where is that disk now?  
18 A. In Spain.  
19 Q. Do you see in the corner  
20 there are some little numbers with  
21 your last name and then some --  
22 A. Oh, yeah, okay.  
23 Q. I'm only showing you that so  
24 we can together go through to some.  
25 A. Okay.

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2 Q. So if I could ask you to  
3 turn to -- well, the first ones  
4 show --

5 A. Sergey, the guy who owns  
6 Google, is kitesurfing.

7 Q. Got it.

8 A. Yeah, that's Sergey.

9 Q. How do you know that that's  
10 Sergey?

11 A. Because he came for lunch  
12 that day and Sergey -- Sergey, hi, I'm  
13 Sergey.

14 Hi, Sergey.

15 Q. Did you have any sexual  
16 relations with Sergey?

17 A. No.

18 Q. If you could turn to the one  
19 that says RANSOME 22 in the corner.  
20 It's about five or six pages back.

21 A. Yes.

22 Q. Who is that in the  
23 photograph?

24 A. Jean Luc.

25 Q. And who is the other person?

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2 A. That's me.

3 Q. And when was this photograph  
4 taken?5 A. This was taken during the  
6 December trip.7 Q. Was there only one trip in  
8 December?

9 A. From what I recall, yeah.

10 Q. Was that the first trip that  
11 you had taken?

12 A. No.

13 Q. When was the first trip you  
14 had taken?15 A. I answered that previously,  
16 which was not so long after I met  
17 Jeffrey Epstein for the first time.  
18 So I had been there various times  
19 before these were taken.

20 Q. Do you know how many?

21 A. Like I said earlier,  
22 several. I mean, I...23 Q. And can you turn to RANSOME  
24 24?

25 A. Mm-hmm.

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2 Q. Who is that?

3 A. That's the wonderful Sarah  
4 Kellen.

5 Q. Did you take these  
6 photographs?

7 A. Jean Luc took these ones.

8 Q. All of them?

9 A. There were -- I had other  
10 photos as well.

11 Q. That came later, a separate  
12 batch?

13 A. Yeah, those are the hard  
14 copies.

15 MS. MENNINGER: I will mark  
16 it now, the second batch,  
17 Defendant's Exhibit 7.

18 (Defendant's Exhibit 7,

19 Bates stamped Ransome\_000204, was  
20 marked for identification.)

21 MS. MENNINGER: I apologize,  
22 Counsel. We just got these last  
23 night, so I only have one copy  
24 for the witness.

25 MR. GUIRGUIS: That's fine.

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2 Q. So is Defendant's Exhibit 7  
3 the second batch that you were  
4 referring to?

5 A. Yes.

6 Q. Okay. So I'm just trying to  
7 help be clear.

8 Defendant's Exhibit 6, you  
9 believe were all given to you by Jean  
10 Luc on a disk?

11 A. Well, there's a lot of  
12 photos here. So I took some, I had  
13 some hard copies, and they're all  
14 actually all together, so...

15 Q. Okay, that's fine.

16 A. Yeah. I don't want to be  
17 unclear on which exhibit is which.  
18 There's hundreds here.

19 Q. So the photographs of Sarah  
20 Kellen, you're saying were taken by  
21 Jean Luc, that we were looking at in  
22 RANSOME 24?

23 A. Well, I can recheck the disk  
24 and then I can actually tell you  
25 exactly which ones he took, but I

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1 HIGHLY CONFIDENTIAL AEO  
2 can't recall every single photo on  
3 Jean Luc's disk. But there were  
4 multiple photos that were produced  
5 from myself as well.

6 Q. Okay. I will just ask you  
7 about a few.

8 A. Okay.

9 Q. RANSOME 24 is one that you  
10 said was -- of Sarah Kellen, was one  
11 you said you thought Jean Luc had  
12 taken?

13 A. Yes.

14 Q. If you could turn to RANSOME  
15 40. And these are in order, so  
16 hopefully that will be easy.

17 A. Okay. Mm-hmm.

18 Q. Who is represented in this  
19 photograph?

20 A. That's [REDACTED]

21 Q. And where is [REDACTED] in this  
22 photograph, if you know?

23 A. This is by the beach.

24 There's like -- there's like a small  
25 beach, like there's a beach house on

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2 the beachfront.

3 Q. Do you know who took this  
4 photograph?

5 A. I can't remember.

6 Q. Okay. Turning a couple more  
7 pages to RANSOME 42, who is that?

8 A. That's me.

9 Q. Are you smoking?

10 A. I am. And that was after  
11 the argument that I had with Jeffrey  
12 about me being on lithium and me not  
13 being able to smoke. And that was the  
14 reason I was really upset, that I  
15 couldn't smoke and that I was being  
16 put on a stupid diet.17 So Jeffrey -- yeah, Jeffrey  
18 said it was okay for me to smoke. I  
19 wasn't allowed to smoke in front of  
20 him. That was the rule.21 Q. Do you know who took this  
22 photograph?23 A. I don't remember who took  
24 that photograph.

25 Q. Is it on the same trip in

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2 December?

3 A. Yes.

4 Q. Turning the next page, is  
5 that also you and Jean Luc?

6 A. That's correct.

7 Q. Do you know who took this  
8 photograph?

9 A. I can't remember.

10 Q. Was it also in the same time  
11 frame when you were upset?

12 A. It was that same December  
13 trip, yes.

14 MS. MENNINGER: We can go  
15 off the record for just a minute.

16 I think we're swapping out  
17 counsel.

18 (Ms. McCawley left the  
19 hearing and Ms. Syed entered.)

20 (Time noted: 4:56 p.m.)

21 (Recess.)

22 (Time noted: 4:56 p.m.)

23 Q. Looking at RANSOME 44,  
24 you're saying it's in the same time  
25 period?

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2 A. Yeah.

3 Q. And also true of 45?

4 A. Yes.

5 Q. And 47?

6 A. Yes. It was the same  
7 holiday, the same trip.

8 Q. And do you know who took  
9 these photographs?

10 A. I don't remember.

11 Q. Is that also true for 48,  
12 49, 50, 51, 52?

13 A. I don't remember who took  
14 those photos.

15 Q. Okay. Can you tell from 52  
16 where you were situated on the island?

17 A. It was on the beach.

18 Q. 53, can you tell me who that  
19 is?

20 A. That's [REDACTED]

21 Q. 54 and 55, also [REDACTED]

22 A. That's correct.

23 Q. 69, who is that?

24 A. That's Jeffrey Epstein.

25 Q. Do you know who took this

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2 photograph?

3 A. I can't remember who took  
4 this photograph.

5 Q. 71, is that you?

6 A. That's correct.

7 Q. Were you posing for the  
8 photograph?

9 A. Most people pose for  
10 photographs, every photograph. So I  
11 presume I was posing.

12 Q. Do you know what Jean Luc's  
13 line of work is?

14 A. I think he's with modeling  
15 or something, like a modeling agent.

16 Q. Do you know where he's  
17 based?

18 A. I have no idea where he's  
19 based.

20 Q. Did you meet him more than  
21 once?

22 A. I can't remember if I met  
23 him more than once.

24 Q. Did you have sexual contact  
25 with him?

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2 A. No.

3 Q. Did you give him a massage?

4 A. No.

5 Q. Sorry. Going back a little

6 bit further to RANSOME 121.

7 A. Mm-hmm.

8 Q. Who is in that photograph?

9 A. That's Nadia and [REDACTED]

10 Q. Okay. So Nadia's on the

11 left?

12 A. That's correct.

13 Q. And [REDACTED] on the right?

14 A. That's correct.

15 Q. Do you know what they're

16 doing?

17 A. I would love to know what

18 they're doing myself, personally.

19 Q. Did you take this

20 photograph?

21 A. I can't remember.

22 Q. Turning to 123, do you know

23 what is happening in that photograph?

24 A. I think we were just playing

25 around. I don't think it was serious,

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2 you know.

3 Q. Okay.

4 A. Just to make that clear.

5 Q. Can I have you look at 126.

6 A. Yeah.

7 Q. Who is in that photograph?

8 A. That's [REDACTED] and [REDACTED]

9 Q. And [REDACTED] is in the  
10 background?

11 A. That's correct.

12 Q. On 127 --

13 A. Mm-hmm.

14 Q. -- who is in that  
15 photograph?

16 A. To the right -- sorry, to  
17 the left it's myself, [REDACTED], Nadia  
18 and then [REDACTED].

19 Q. Is this on the same December  
20 trip?

21 A. That's correct.

22 Q. When did Jean Luc give you  
23 the disk?

24 A. I can't remember when he  
25 gave me the disk.

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2 Q. Do you know if these  
3 photographs are ones that he took?

4 A. They were photos that were  
5 taken during our holiday together, and  
6 they were given to me as a memento, as  
7 a present from John Luc.

8 Q. In person?

9 A. I can't remember.

10 Q. Do you recall the tortoise?

11 A. I can't remember the  
12 tortoise.

13 Q. Apart from [REDACTED], [REDACTED]  
14 Nadia and yourself and Jean Luc, do  
15 you remember anyone else being on this  
16 particular trip?

17 A. There were -- there were  
18 quite a few people that visited the  
19 island. I don't remember their names.

20 Q. Can I have you look at 138.

21 A. Mm-hmm, yeah.

22 Q. Do you know who took that  
23 photograph?

24 A. I don't know who took that  
25 photograph.

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2 Q. Do you know when it was  
3 taken?

4 A. It was taken that December  
5 trip that I took with Ghislaine and  
6 Jeffrey.

7 Q. How do you know that?

8 A. Because I remember what she  
9 was wearing. And I was there. I was  
10 there in person. Like, I was there.

11 Q. So you saw her on the island  
12 wearing those clothes?

13 A. I saw her on the island  
14 wearing those clothes.

15 Q. Did you see her sitting in  
16 this position while on the island?

17 A. I saw her with my own eyes  
18 sitting in this position. I was  
19 probably sitting next to her.

20 Q. But you don't know if you  
21 took the photograph or someone else?

22 A. You know what? Photos are  
23 photos. I don't remember if I took  
24 the photo or if someone else took the  
25 photo.

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2 All I remember is I was with  
3 Ghislaine on this trip. I was  
4 probably sitting next to her in this  
5 photo. I don't know who -- which  
6 specific girl took the photo.

7 Q. Do you know if it was a girl  
8 who took the photo?

9 A. I have no idea who took the  
10 photo. I just remember sitting there  
11 and remember being next to Ghislaine  
12 while she was wearing that outfit. I  
13 was there during that time frame.

14 Q. RANSOME 139, who is that, if  
15 you know?

16 A. That is Sarah Kellen after  
17 she had a shower, and she's in  
18 Victoria's Secret pajamas that were  
19 supplied to us.

20 Q. They were supplied to you?

21 A. Yes. All of the outfits --  
22 there were clothes that were provided  
23 on the island by Jeffrey Epstein,  
24 which were all Victoria's Secret  
25 clothing: bikinis, nightwear.

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2 Q. You're talking about the  
3 flannel pajamas?

4 A. Yes.

5 Q. Page 140, do you know who  
6 took this photograph?

7 A. I don't remember taking this  
8 photo, but I remember that very well  
9 because we are doing mosaic on that  
10 table. We were busy doing a fish. So  
11 that's what all these are apparatus  
12 are. We were doing mosaics.

13 So I don't remember if I  
14 took that photo, but I remember I was  
15 there, because we were all doing  
16 mosaics.

17 Q. 142?

18 A. Mm-hmm.

19 Q. Do you remember who took  
20 that photograph?

21 A. I can't remember -- oh, the  
22 BlackBerry. I can't remember who took  
23 all the photos when I was there. You  
24 can see the mosaics that we were doing  
25 together.

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2 Q. Do you still have that  
3 mosaic?

4 A. No. It was on the big table  
5 that she's sitting at, the large  
6 table. So we actually stuck the  
7 mosaic on the table.

8 Q. 143, do you know who took  
9 that?

10 A. No. We were all there  
11 together.

12 Q. Going through the rest, do  
13 you see any that you know who took the  
14 photo?

15 A. No.

16 MR. GUIRGUIS: Take your  
17 time and look at each one.

18 Don't just -- take your time.

19 Can we take a break for just  
20 a minute.

21 (Time noted: 5:06 p.m.)

22 (Recess.)

23 (Time noted: 5:15 p.m.)

24 Q. Did you have a chance to  
25 look through the rest of the

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2 photographs in Defendant's Exhibit 6?

3 A. No, because I took a break,  
4 so I will continue now.

5 Q. Sure.

6 A. I can't remember who took  
7 these photos. It was during all the  
8 same trip.

9 Q. It was what?

10 A. It was during that same  
11 trip.

12 Q. Can I have you take a look  
13 at RANSOME 154. It's one of the last  
14 few of that exhibit.

15 A. Yes.

16 Q. Do you know where that  
17 photograph was taken?

18 A. I can't remember.

19 Q. Do you know if you were  
20 there?

21 A. I can't remember.

22 Q. Does it appear to be inside  
23 of a shop?

24 A. It appears that way.

25 Q. Do you recall going to any

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2 shops on that trip?

3 A. I went everywhere with  
4 Jeffrey, so...

5 Q. Did that include shops?

6 A. Yes.

7 Q. Do you recall this shop?

8 A. There were many shops that I  
9 visited. I can't recall this specific  
10 shop.

11 Q. Do you know who the  
12 gentleman is?

13 A. I can't remember his name.

14 Q. And by gentleman, I mean the  
15 person on the left.

16 A. Thank you for clarifying  
17 that.

18 No, I don't recall. I don't  
19 know who this Jeffrey -- Jeffrey's on  
20 the right. I don't know the name, I  
21 can't remember the name of this guy.

22 Q. Wearing a belt?

23 A. Trying on a belt, yeah.

24 Q. Okay. Turning to  
25 Defendant's Exhibit 7.

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2 A. Yes.

3 Q. Do you recognize these  
4 photographs?

5 A. I remember this photograph,  
6 the first one, very well.

7 Q. What is it?

8 A. It's a box -- it's a box of  
9 condoms that were placed around the  
10 island for the guests to use at their  
11 leisure.

12 Q. Where on the island was this  
13 one?

14 A. I can't remember.

15 Q. Did you take the photograph?

16 A. I can't remember.

17 Q. Do you have this photograph  
18 at your house now?

19 A. I'll have to recheck. I  
20 can't remember where this photo came  
21 from, if it was either on the disk or  
22 by myself. But it was -- I recognize  
23 the box. There were boxes like this  
24 put everywhere.

25 Q. Did you have any photographs

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2 contained on your computer?

3 A. No.

4 Q. Where were photographs that  
5 you gathered together to produce?

6 A. You've got them all there.

7 I just need to -- all the photos that  
8 I have, you guys have. So I don't  
9 know.

10 Q. Where were they? Where did  
11 you find them?

12 A. My photos?

13 Q. Yes.

14 A. In my storage.

15 Q. Where is that?

16 A. It was in England. It was  
17 in my private box where I keep all my  
18 photos from, you know, when I was a  
19 baby to now, so...

20 Q. Is that with your mother?

21 A. No, that wasn't with my  
22 mother.

23 Q. Where is the storage in  
24 London?

25 A. The storage was in Ramsgate.

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2 Q. And where did it go?

3 A. It's now in my current  
4 residency in Spain.

5 Q. When you gathered the photos  
6 together and gave them to your lawyer  
7 to give to us, did you gather them in  
8 Spain or in London?

9 A. My stuff was in London and I  
10 moved to Barcelona. I was currently  
11 staying in Barcelona with Peter, and  
12 we were just going to commute between  
13 St. Albans and Barcelona.

14 When I came forward, I knew  
15 that I had photos that I had taken and  
16 I knew that I had materials.

17 At that same time is --  
18 during that same time, I contacted  
19 Maureen Callahan. When I contacted  
20 Maureen Callahan, there were people  
21 that were following me in Barcelona,  
22 and I got scared.

23 I then contacted my estate  
24 agent. I got my entire flat packed up  
25 in St. Albans and moved to Spain. I

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2 was too frightened to actually fly  
3 back myself and pack, so I stayed in  
4 Barcelona and a company packed my  
5 things for me and brought them to me.

6 Q. Okay. So they were in St.  
7 Albans. You had them all packed up  
8 and sent to you in Barcelona, where  
9 you relocated?

10 A. That's correct.

11 Q. When you were interacting  
12 with Ms. Callahan, did you send her  
13 any photographs?

14 A. Sorry, sorry. Who is  
15 Ms. Callahan? Sorry. I'm just really  
16 tired. I'm really bad with names.  
17 Callahan first name, please.

18 Q. Do you know who Ms. Callahan  
19 is?

20 A. It's really late, I've had a  
21 really long day, and I've said  
22 numerous times throughout the day that  
23 I am slightly dyslexic and I have  
24 difficulty with names.

25 Can you just tell me

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2 Ms. Callahan's first name so I can  
3 answer the question, please.

4 Q. Is Ms. Callahan the name of  
5 the individual that you said worked  
6 for the New York Post?

7 A. Oh, sorry. Maureen  
8 Callahan, yes.

9 Q. Did you send Ms. Callahan  
10 any photographs?

11 A. Not of this, no. Not of  
12 this.

13 Q. Did you send her photographs  
14 of something else?

15 A. I did. I sent her a photo  
16 of my ex-boyfriend and myself.

17 Q. Who was your ex-boyfriend?

18 A. [REDACTED] [REDACTED]

19 Q. Who is that?

20 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] .

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 Q. And when was he your  
25 boyfriend?

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2 A. In Edinburgh, before I moved  
3 to New York.

4 Q. Why did you send  
5 Ms. Callahan a photograph of yourself  
6 and your boyfriend?

7 A. Because I wanted to show her  
8 I was telling the truth about  
9 everything. I didn't want to send a  
10 journalist anything regarding Jeffrey  
11 Epstein because I -- I -- well, I sent  
12 her a picture of [REDACTED] [REDACTED] and I  
13 to show that I was telling my story,  
14 that my story was straight from the  
15 beginning, that I know the people I  
16 mentioned, etcetera. So...

17 Q. So [REDACTED] figured into the  
18 story that you had relayed to  
19 Ms. Callahan?

20 A. Yes, because [REDACTED] and I  
21 had a breakup, and that was one of the  
22 reasons I moved to New York.

23 Q. Have you had contact with  
24 [REDACTED] since then?

25 A. Throughout the years on and

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2 off, but, no, I don't have any contact  
3 with him now.

4 Q. Apart from the photograph  
5 with yourself and [REDACTED] did you send  
6 Ms. Callahan any other documents or  
7 photographs?

8 A. I can't remember.

9 Q. Did you have contact with  
10 any other media person?

11 A. I can't remember.

12 Q. Did you meet with anyone  
13 from the Daily Mail?

14 A. No.

15 Q. From the Mirror?

16 A. No.

17 Q. Did you speak to anyone from  
18 the Daily Mail?

19 A. No.

20 Q. Anyone from the Mirror?

21 A. No.

22 Q. The Independent?

23 A. No.

24 Q. The Guardian?

25 A. No.

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2 Q. When you got these boxes of  
3 items from St. Albans and you looked  
4 at them while you were in Barcelona;  
5 is that right?

6 A. I --

7 MR. GUIRGUIS: Objection.

8 A. I looked at them -- I  
9 vaguely went through the photos in St.  
10 Albans. I knew what was there. Yeah,  
11 I -- they were there, so I saw them.  
12 I went through my photos, like all my  
13 memorabilia that had been in storage.  
14 But that's about it.

15 Q. And you selected photographs  
16 to send to your lawyers to give to us,  
17 correct?

18 A. I was asked to -- well I  
19 just provided every -- all the  
20 evidence that I had.

21 Q. When did do you that?

22 MR. GUIRGUIS: I'm going to  
23 object. If you're talking about  
24 a communication between client  
25 and counsel -- is that what

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2 you're asking for?

3 MS. MENNINGER: No. I'm  
4 asking when did you provide all  
5 of your evidence, which is what  
6 she said that she had.

7 MR. GUIRGUIS: The photos --

8 you mean when she provided them  
9 to her counsel?

10 MS. MENNINGER: Yes.

11 Q. When did you provide them to  
12 your counsel?

13 MR. GUIRGUIS: Objection.

14 Do not answer.

15 Q. Did you receive a subpoena  
16 in this case?17 A. I don't know what a subpoena  
18 is.19 MS. MENNINGER: Let's mark  
20 Defendant's Exhibit 8.21 (Defendant's Exhibit 8,  
22 Notice of Service of Rule 45  
23 Subpoena and Notice of Deposition  
24 of Sarah Ransome, was marked for  
25 identification.)

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2 Q. Have you seen this document  
3 before?

4 A. Let me just have a look,  
5 okay. I don't remember.

6 Q. Have you ever seen this  
7 document before?

8 MR. GUIRGUIS: Objection,  
9 asked and answered.

10 MS. MENNINGER: I'm sorry.  
11 I didn't hear an answer.

12 A. I've seen various papers. I  
13 remember specifically seeing the  
14 depositions. There's been millions of  
15 documents. I can't remember which  
16 specific documents I've seen.

17 Q. Okay. If I could have you  
18 turn to the last three pages, where it  
19 says "Documents to be Produced."

20 A. Mm-hmm.

21 Q. Have you seen that list  
22 before?

23 A. Yes, I have.

24 Q. Did you conduct a search of  
25 your records to produce documents?

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2 A. Yes, I believe that I  
3 produced every single document I can.

4 Q. After looking at this list,  
5 did you go back and look through your  
6 photographs in Barcelona?

7 A. As I said, I looked at  
8 everything I had during that time  
9 frame and I produced everything I can  
10 during that time frame that I was with  
11 Jeffrey.

12 Q. Just tell me what you did in  
13 order to make sure you had produced  
14 everything that was called for in this  
15 list.

16 A. Okay. So I went through a  
17 box of about over 5,000 photos that I  
18 had, and I went through every single  
19 photo, every single disk, everything  
20 that I had.

21 I went through all my  
22 emails.

23 I tried to look for the  
24 BlackBerry sim card, which I had hoped  
25 that I had kept, which had all

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2 Ghislaine's messages on and Jeffrey's  
3 and Lesley's, and stupidly I misplaced  
4 that, which is really annoying.

5 But I myself, you know,  
6 considering my objective is to get  
7 these people and get justice for the  
8 abuse that Ghislaine caused me -- and  
9 Jeffrey -- I have given as sufficient  
10 evidence that I have.

11 Q. Did you look for all  
12 photographs taken by you or containing  
13 any image of you at or near any home,  
14 business, private vehicle or any other  
15 property owned or controlled by  
16 Jeffrey Epstein, as indicated in  
17 paragraph 7?

18 A. Yes.

19 Q. Likewise in paragraph 8, did  
20 you look for any photographs that  
21 depict any home, business, private  
22 vehicle or any other property owned or  
23 controlled by Jeffrey Epstein?

24 A. Yes.

25 Q. And you did that after

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2 reviewing this list of documents?

3 A. Yeah, I mean, I received the  
4 list and I've complied with  
5 everything. I have given absolutely  
6 everything that I can to you guys.

7 Q. Have you given all of your  
8 passports, travel visas or permissions  
9 to live, work or study in other  
10 country?

11 A. I haven't given my current  
12 passports, but I've given everything  
13 that I have; documents, passports that  
14 I had during, commercial plane  
15 tickets.

16 Q. Do you have any visas?

17 A. I have a visa coming here,  
18 but that's the only visa that I have.

19 Q. Do you have any visa  
20 applications?

21 A. No.

22 Q. Do you have any other plane  
23 tickets or boarding passes for the  
24 period 2006 to 2007?

25 A. No.

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2 Q. Turning back to Defendant's  
3 Exhibit 7, these photographs, do you  
4 know what the second photograph  
5 represents?

6 A. Yes, that's me playing with  
7 Ghislaine's dog, a Yorkshire Terrier.

8 Q. Where are you in this  
9 picture?

10 A. I was in the girls' bedroom  
11 where we all slept, and I was on my  
12 bed playing with Ghislaine's dog.

13 Q. When was this photograph  
14 taken?

15 A. I can't remember.

16 Q. Was it the same trip as  
17 Defendant's Exhibit 6?

18 A. I can't remember.

19 Q. Okay. Do you know who took  
20 the photograph in 205?

21 A. I can't remember.

22 Q. 206?

23 MR. GUIRGUIS: Objection to  
24 form.

25 A. I can't remember.

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2 Q. 207?

3 MR. GUIRGUIS: Objection to  
4 form.

5 A. Can't remember.

6 Q. Who is depicted in 208?

7 A. [REDACTED]

8 Q. And?

9 A. Oh, and me. That's me.

10 Q. And 209?

11 A. Sorry. That's me, [REDACTED]  
12 Jean Luc, and one of Jeffrey's staff  
13 members in the background.

14 Q. Turning to 213, is that you?

15 A. Yes, that's me.

16 Q. And where are you located?

17 A. I'm trying to remember  
18 specifically where that is on the  
19 island. I think it's near the main  
20 house, there was a -- yeah, there was  
21 a fountain near the main house.22 Q. Do you know whether you took  
23 this?

24 A. I don't remember.

25 Q. Do you know whether you had

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2 this photograph on the disk?

3 A. I think these were one of my  
4 photos.

5 Q. Was it in hard copy, like an  
6 actual print?

7 A. I can't remember. I have to  
8 double check if there are more copies.

9 But I think -- yeah, I'm pretty sure  
10 this is a hard copy.

11 Q. Does it have a back, like  
12 when it was developed or printed?

13 A. I can check.

14 Q. Is it back in Barcelona?

15 A. No.

16 Q. Where are these photographs?

17 A. I have given all the  
18 photographs to my lawyers.

19 Q. Okay. How did you do that?

20 By handing them over in person?  
21 Sending them by mail?

22 A. Handing them over in person.

23 Q. Was this some type of photo  
24 shoot represented in RANSOME 214, 215,  
25 216?

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2 A. Sorry. 214, this is not a  
3 photo shoot. We were just messing  
4 around on the island.

5 Q. Do you know who you were  
6 messing around with?

7 A. We were all having fun  
8 together.

9 Q. Were there photographs of  
10 other people taken around the same  
11 time that you have?

12 A. I have given all the photos  
13 that I have.

14 Q. In other words, if you were  
15 messing around with [REDACTED] at this  
16 time and there's a photo of [REDACTED]  
17 that you have, did you provide that?

18 A. I provided every single  
19 photograph that I have.

20 Q. And 218, was that a photo  
21 shoot?

22 A. That was me when I was  
23 naked, actually, and I had a towel  
24 around me. So I think I just had a  
25 massage by Jeffrey, because I was

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2 naked underneath the towel.

3 Q. Also 219 and 220?

4 A. Yep.

5 Q. Those were just after a  
6 massage?

7 A. Yeah. You can tell I look  
8 really, really happy to be out of  
9 there, so...

10 Q. Do you know which trip that  
11 was on?

12 A. I can't remember which trip.

13 Q. And page RANSOME 221, who is  
14 in that photograph?

15 A. Myself, [REDACTED] and Jean Luc,  
16 and a staff member in the background.

17 Q. Do you know what's happening  
18 in 223?

19 A. Oh, no. Yes. So Jeffrey  
20 provided cosmetics for all the girls.  
21 We had to look our best. So that was  
22 a Crème de la Mer facial mask that he  
23 regularly gave to the girls so their  
24 skin was nice. We had top-line  
25 cosmetics in our bathroom to use at

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2 our disposal.

3 Q. So in 223 and 224 you're  
4 doing a facial mask?

5 A. I'm attempting to do a  
6 facial. It's not going that well.

7 Q. And going to 229, do you  
8 know where that was taken?

9 A. That was on Jeffrey's  
10 speedboat to -- going to the island.

11 Q. Do you know when?

12 A. I don't recall which date  
13 that was.

14 Q. Did you have any contact  
15 with the mail on Sunday?

16 MR. GUIRGUIS: Objection.

17 Huh?

18 Q. Did you ever have any  
19 contact with the mail on Sunday?

20 A. No.

21 MR. GUIRGUIS: You mean the  
22 mail as in postage? I'm sorry.

23 MR. PAGLIUCA: The  
24 newspaper.

25 A. No, no, I haven't had

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2 correspondence with them, no.

3 Q. Apart from Ms. Callahan,

4 have you had contact with any member  
5 of the press?

6 A. Oh, I contacted Bianca

7 Jagger because she runs a foundation  
8 that helps abused girls.

9 Q. Okay. Did you have any  
10 contact with any other member of the  
11 press?

12 A. No.

13 Q. When was the last time that  
14 you saw Ghislaine Maxwell?

15 A. In New York, before I left  
16 in 2007.

17 Q. How long before you left?

18 A. I can't remember.

19 Q. What time of year was it?

20 A. When I left?

21 Q. Yes.

22 A. It was the end of April.

23 Q. How do you know that?

24 A. Because I am -- on some of  
25 the emails, I wanted to go home.

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2 Actually, back to my mom.

3 Q. When's the last time you  
4 spoke to Ghislaine Maxwell?

5 A. Before I left New York.

6 Q. Okay. Do you know how long  
7 before you left?

8 A. I can't remember.

9 Q. Tell me what you recall  
10 about the last time you saw Ghislaine  
11 Maxwell.

12 A. I can't remember.

13 Q. Where it was?

14 A. I can't remember my last  
15 interaction with Ghislaine.

16 Q. Or the last time you spoke  
17 with her?

18 MR. GUIRGUIS: Objection,  
19 asked and answered.

20 A. I can't remember the last  
21 time I spoke to her. Yeah, I don't  
22 remember the specifics.

23 Q. Were you living with Adam at  
24 the time you last spoke to Ghislaine?

25 A. Yes.

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2 Q. What did she say to you when  
3 you last spoke to her --

4 MR. GUIRGUIS: Objection,  
5 asked and answered.

6 Q. -- when you were living with  
7 Adam?

8 MR. GUIRGUIS: Objection,  
9 asked and answered.

10 A. I can't remember.

11 Q. Did you speak to her about  
12 FIT?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. I had spoken to her numerous  
16 times about FIT.

17 MS. MENNINGER: Counsel,  
18 when did I already ask her, did  
19 you speak to her about FIT.

20 MR. GUIRGUIS: You've asked  
21 her --

22 THE WITNESS: Several times.

23 MS. MENNINGER: I'm not  
24 talking to you.

25 MR. GUIRGUIS: Okay.

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2 THE WITNESS: That was rude.  
3 MR. GUIRGUIS: It was, and  
4 I'm not going to answer her  
5 question now.

6 You can proceed, Counsel.

7 MS. MENNINGER: When did I  
8 last ask her about --

9 MR. GUIRGUIS: I'm not going  
10 to answer your question. I'm not  
11 being deposed. I'm not arguing  
12 objections with you. You have  
13 asked her about it before; that's  
14 why I made my objection.

15 You can proceed with your  
16 questioning whenever you like,  
17 Counsel.

18 MS. MENNINGER: Thank you.

19 MR. GUIRGUIS: Feel free to  
20 search the transcript later.

21 MS. MENNINGER: I would like  
22 to mark as Defendant's Exhibit 8.

23 (Defendant's Exhibit 8,  
24 Bates stamped RANSOME\_000004, was  
25 marked for identification.)

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2 Q. Do you recognize Defendant's  
3 Exhibit 8?

4 A. Yes, I do.

5 Q. What is it?

6 A. They're emails.

7 Q. Did you find these emails  
8 and produce them?

9 A. That's correct.

10 Q. Where did you find them?

11 A. On my old email account that  
12 I had during that time.

13 Q. What was your old email  
14 account?

15 A. [REDACTED]

16 Q. When did you stop using that  
17 email account?

18 A. A guess a year or a few  
19 months after. I can't recall when I  
20 stopped using it.

21 Q. Do you see on the first page  
22 where it says RANSOME 004, there are  
23 two emails in the chain which are  
24 visible?

25 A. That's correct.

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2 Q. And did you produce the  
3 other emails between those two that  
4 are not visible?

5 A. Yes.

6 Q. When did you do that?

7 A. The same time I provided all  
8 the emails originally.

9 Q. Okay. So you believed that  
10 you produced six emails of  
11 conversation between yourself and  
12 Natalya Malyshew?

13 MR. GUIRGUIS: I'm going to  
14 object and just ask for  
15 clarification.

16 I'm not trying to give you a  
17 hard time on this one. When you  
18 say produced, you're asking the  
19 witness if she provided it to her  
20 attorneys, right? Because  
21 obviously the attorneys produced  
22 the documents in this case.

23 MS. MENNINGER: Correct.

24 MR. GUIRGUIS: So just --  
25 she didn't produce anything,

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2 obviously.

3 So she's asking you did you  
4 collect this email and give it to  
5 the lawyers, I guess is the  
6 question.

7 A. Yeah, I collected all --

8 all -- everything I had, I gave to my  
9 lawyers.10 Q. Okay. So you believe you  
11 gave six emails between yourself and  
12 Natalya Malyshew to your attorneys?

13 A. Yes, I gave all my evidence.

14 Q. Okay. And --

15 MR. GUIRGUIS: I'm going to  
16 object to that last question also  
17 as misrepresenting the testimony.18 MS. MENNINGER: What was  
19 misrepresenting what testimony?20 MR. GUIRGUIS: You're saying  
21 that she gave six emails.22 MS. MENNINGER: Well, let's  
23 go back, then, and get the  
24 testimony right.

25 Q. On RANSOME 004, how many

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2 emails between yourself and Natalya  
3 Malyshев do you see total?

4 There's one at 1:04 a.m.,  
5 correct?

6 MR. GUIRGUIS: Counsel,  
7 you're doing the exact thing that  
8 I just tried to avoid confusion  
9 on, right?

10 There's a difference between  
11 what was produced to you -- and  
12 apparently and you're saying that  
13 six emails were produced to  
14 you --

15 MS. MENNINGER: No, I was  
16 not saying that.

17 MR. GUIRGUIS: -- which  
18 she's providing to her counsel.

19 MS. MENNINGER: No, I'm not  
20 saying that. So I'm trying to  
21 get it straight now.

22 Q. There's an email indicated  
23 on the first page from Natalya to you  
24 at 1:04 a.m. on February 3rd, 2007,  
25 correct?

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2 A. Mm-hmm. Yes.

3 Q. And you can read the text of  
4 that email, correct?

5 A. Yes, I can.

6 Q. And the next email down says  
7 "Sarah Ransome" at 4:07 -- at 4:01  
8 p.m.

9 A. Mm-hmm.

10 Q. Can you read that email?

11 A. No, because it's on Yahoo.

12 It's a technological thing. You can't  
13 read all emails.

14 Q. So did you produce the  
15 February '04, '07, 4:01 p.m. email  
16 from yourself to Nataly Malyshew to  
17 your attorneys?

18 MR. GUIRGUIS: Objection to  
19 the use of the word produce.

20 A. I've given all my email  
21 correspondence to my lawyers.

22 Q. Did you give that email to  
23 your lawyer?

24 A. I've given all my emails to  
25 my lawyers.

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2 Q. Okay. The next email down  
3 says "Sarah Ransome, February 5, 2007,  
4 at 10:09 p.m."

5 Can you read the text of  
6 that email on this document?

7 A. Mm-hmm.

8 Q. What does the 10:09 p.m.  
9 email say?

10 A. As I've specified before,  
11 this is a screenshot, okay, of the  
12 actual Yahoo email. This is a  
13 screenshot. So technically I can't  
14 read that anyways, seeing as it's a  
15 screen shot.

16 Q. Okay.

17 A. This isn't a computer. I  
18 can't tap into that email on a page  
19 because it's a screen shot.

20 Q. Did you give a February 6th,  
21 '07, 2:00 a.m. email between yourself  
22 and Nataly Malyshev to your attorneys?

23 A. I have handed all over my  
24 evidence to my attorneys.

25 Q. Did you give a February 8,

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2 2007, 9:12 p.m. email from yourself to  
3 Nataly Malyshew to your attorneys?

4 A. I have given all my evidence  
5 to my attorneys.

6 MS. MENNINGER: I'm going to  
7 show you Defendant's Exhibit 10.

8 (Defendant's Exhibit 10,  
9 Bates stamped RANSOME\_000006, was  
10 marked for identification.)

11 Q. Do you recognize Defendant's  
12 Exhibit 10?

13 A. Yes.

14 Q. What is it?

15 A. It's an email correspondence  
16 between Lesley Groff and myself.

17 Q. On the second page, RANSOME  
18 0008, do you see other emails with  
19 headings but no text visible in the  
20 screenshot?

21 A. Mm-hmm.

22 Q. Did you give each one of  
23 those emails to your attorneys?

24 A. I have given all my  
25 correspondence to my attorneys.

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2 Q. Do you see in the "Smart  
3 View" column on the left side a folder  
4 named "Pumla Griszell"?

5 A. Yes, I do.

6 Q. Does that folder contain  
7 your correspondence with Pumla  
8 Griszell?

9 A. I didn't even know that  
10 folder was there, but I presume so,  
11 which is why I would have created it  
12 in the first place.

13 Q. And it also shows a  
14 substantial number of documents in  
15 your Inbox.

16 A. Yes.

17 Q. Did you search your Inbox  
18 for documents responsive to the  
19 subpoena that I showed you a little  
20 while ago?

21 A. I did. I wanted to be  
22 thorough with my research, so I,  
23 during that time frame, went through  
24 every single email.

25 Q. You went through each one?

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2 A. I went through all of my  
3 emails to make sure I gave all my  
4 evidence to my lawyers.5 Q. Did you search for keywords  
6 or did you just read each email?

7 A. I read each email.

8 Q. And did you print out each  
9 email?10 A. I didn't print out. I saved  
11 them to a USB stick.12 Q. All of them or just the ones  
13 that you thought were needed?14 A. Just the ones that were  
15 for -- just anything related to  
16 Jeffrey, I sent over.17 Q. And I think you testified  
18 earlier you believe you still have  
19 your FIT application in an email?20 A. I haven't read it. I'm  
21 assuming I have it.22 MS. MENNINGER: I want to  
23 show you Defendant's Exhibit 11.24 (Defendant's Exhibit 11,  
25 Maureen Callahan article, was

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2 marked for identification.)  
3 A. Oh, it's 9th of October,  
4 sorry.

5 Q. Do you recognize this  
6 document?

7 A. Let me go to the last  
8 sentence. That catchphrase that I  
9 mentioned earlier, as I said earlier,  
10 I couldn't remember the contents of  
11 the article earlier. I do apologize,  
12 I got the date wrong from the 16th.  
13 It was actually the 9th of October. I  
14 couldn't remember the specific date.

15 I remember the specific  
16 statement that really struck a chord  
17 with me, which was, "The true number  
18 of Epstein's victims will never be  
19 known."

20 Q. So you believe this is the  
21 document by Maureen Callahan that you  
22 read last October that caused you to  
23 come forward?

24 A. I'm presuming so, because  
25 I've gone straight to the bank, and

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2 the sentence that I told you that I  
3 remembered is this. So I'm assuming,  
4 yes, that it's the same.

5 Q. And this article had a big  
6 impact on you because it caused you to  
7 come forward, I think you testified  
8 earlier; is that correct?

9 A. That's correct.

10 Q. All right. Do you also see  
11 on that last page, just right where  
12 you were, there's a little box on the  
13 left hand side. Can you read that out  
14 loud, beginning "Today Jeffrey  
15 Epstein..."

16 Do you see that in bold  
17 letters on that last page?

18 A. Oh.

19 Q. Can you just read that  
20 sentence to us?

21 A. "Today Jeffrey Epstein is a  
22 free man, albeit one who routinely has  
23 civil lawsuits brought against him by  
24 young women out of court."

25 MS. MENNINGER: Okay.

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2 Defendant's Exhibit 12.  
3 (Defendant's Exhibit 12,  
4 website printout titled How to  
5 Apply, was marked for  
6 identification.)  
7 Q. Do you recognize this  
8 document?  
9 A. I've seen it before, yes.  
10 Q. And what do you recognize it  
11 be?  
12 A. It's the application how you  
13 apply to FIT.  
14 Q. It talks about students  
15 applying to different parts of the  
16 school, including arts and design or  
17 business and technology.  
18 Do you recall if you were  
19 applying to a particular area at FIT  
20 or a general admission?  
21 A. I wanted to specialize in  
22 fashion designing.  
23 Q. Do you know if that was a  
24 special area?  
25 A. Yes, it was. FIT's the

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2 financial -- fashion school, so yeah.

3 Q. Did you visit the building  
4 where FIT is located?

5 A. Yes, I did.

6 Q. Did you attend classes  
7 there?

8 A. No.

9 Q. I mean did you visit a  
10 class. I know you didn't enroll, but  
11 did you visit a class?

12 A. No, I didn't. But I went to  
13 the university, had a look around.

14 Q. Did you take a tour?

15 A. Not per se. I mean, I went  
16 around, I looked at the university. I  
17 didn't go on a big personalized tour  
18 with a specific person, no.

19 Q. Did you talk to any of the  
20 teachers there?

21 A. No, I didn't.

22 Q. Do you recall there being  
23 multiple steps for applications to  
24 FIT?

25 A. There's multiple steps on

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2 any college application form.

3 Q. Do you remember what those  
4 steps were when you were applying?

5 A. No.

6 Q. Do you remember an original  
7 application which had details?

8 A. I can't remember the  
9 original application form, no.

10 Q. Do you remember there being  
11 a separate essay portion?

12 A. Yes, I do remember that.

13 Q. Do you remember a separate  
14 portion that relates to students who  
15 are applying who are not U.S.  
16 citizens?

17 A. I can't remember that. I  
18 can't remember the specific form.

19 Q. Do you remember filling out  
20 any special paperwork for someone who  
21 was applying who was not a U.S.  
22 citizen?

23 A. No, there was no paperwork  
24 as such for that. Jeffrey Epstein was  
25 sorting that out for me with his

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2 connections at FIT.

3 Q. So you don't believe you  
4 filled that part out?

5 MR. GUIRGUIS: Objection.

6 A. I said I can't remember  
7 filling that part out.

8 Q. Do you remember getting a  
9 copy of your transcript from Queen  
10 Margaret University?

11 A. I haven't got my transcripts  
12 yet, but I can get them.

13 Q. Do you remember submitting  
14 them to FIT?

15 A. I can't remember.

16 Q. Did you get a degree from a  
17 school in Edinburgh, high school?

18 A. So I finished all my high  
19 school qualification, which, you know,  
20 my grades were good enough to get into  
21 psychology and sociology in Edinburgh.

22 Q. What was the name of your  
23 high school?

24 A. Grantown Grammar School.

25 Q. Did you get a transcript

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2 from that school to provide to FIT?  
3 A. I think I was in the process  
4 of getting my transcripts from Queen  
5 Margaret. I did have a copy of my  
6 high school grades as well. When you  
7 fill out an application, you submit  
8 all your grades, high school.

9 Q. And that's the one in  
10 Scotland?

11 A. Yes, that's correct.  
12 MS. MENNINGER: I think I've  
13 only got a couple more questions,  
14 but I got my piles messed up.  
15 Can we take a two-minute break  
16 and I can get organized and  
17 finished.

18 (Time noted: 5:54 p.m.)

19 (Recess.)

20 (Time noted: 6:07 p.m.)

21 MS. MENNINGER: I'm going to  
22 mark a new exhibit Defendant's  
23 Exhibit 13.

24 (Defendant's Exhibit 13,  
25 Bates stamped RANSOME\_000007 was

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2 marked for identification.)

3 Q. Do you recognize this  
4 document?

5 A. Yes, I do.

6 Q. What is it?

7 A. It was an email sent to my  
8 friend Pam.

9 Q. Is that different than Pam  
10 that you were with on the island?

11 A. I was never with Pam on the  
12 island. It was [REDACTED].

13 Q. Do you remember testifying  
14 about someone named Pam?

15 A. Pam was my friend in New  
16 York.

17 Q. Is that the same person you  
18 were writing here, or is that a  
19 different person?

20 A. It's the same person; it's  
21 just I called her Pam. It's a South  
22 African name. She's South African.

23 Q. How did you know Pam?

24 A. I met her in New York.

25 Q. Do you know whether you paid

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2 for your plane ticket to come back to  
3 New York from South Africa in February  
4 of '07?

5 A. I didn't pay for my ticket.

6 Q. You did not?

7 A. No.

8 Q. Do you see in your email  
9 exchange in Defendant's Exhibit 13  
10 that you wrote to Pam on February 8th  
11 of '07, "Not going to Miami anymore,  
12 clearly, and have to pay for me flight  
13 back."

14 It's in the second paragraph  
15 towards the bottom.

16 A. Mm-hmm.

17 Q. Did you write that?

18 A. Yes.

19 Q. But you did not, in fact,  
20 pay for your flight back?

21 A. No.

22 Q. Do you know what you meant  
23 by "Not going to Miami anymore,  
24 clearly...?"?

25 A. I can't remember what that

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1 HIGHLY CONFIDENTIAL AEO  
2 whole Miami thing was about. It never  
3 came about, so I can't remember the  
4 specific details on Miami. But it was  
5 via Jeffrey Epstein.

6 Q. Okay. How did it happen  
7 that you were writing, "I'm going to  
8 have to pay for me flight back," but  
9 you did not, in fact, pay for your  
10 flight back?

11 A. Because Jeffrey Epstein and  
12 I had a fight about my weight. So  
13 that was probably during the argument,  
14 the time frame that I had the argument  
15 with Jeffrey. He said that he refused  
16 to pay for my flight back if I didn't  
17 get down to 52 kilograms.

18 Q. And how did it come about  
19 that you did not pay for your flight  
20 back?

21 A. I carried on losing weight  
22 to try and get to the goal that  
23 Jeffrey and Ghislaine had set for me,  
24 which is 52 kilograms.

25 Q. How does that relate to

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1 HIGHLY CONFIDENTIAL AEO

2 payment for a flight?

3 MR. GUIRGUIS: Objection.

4 A. Well, I didn't pay for that  
5 flight because Jeffrey was financing  
6 me, so I wouldn't have had the money  
7 to pay for my own flight back.

8 Q. But you said you were "going  
9 to have to pay for my flight back,"  
10 right?

11 A. That's correct.

12 Q. And then what changed?

13 MR. GUIRGUIS: Objection,  
14 asked and answered.

15 A. I made up with Jeffrey. I  
16 tried to meet my target weight of  
17 52 kilograms.

18 Q. And how did you make up with  
19 him?

20 A. I can't remember if it was  
21 telephone call or email or message,  
22 but there were various phone calls  
23 that were made to my family home from  
24 Ghislaine and Jeffrey during that time  
25 frame.

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2 It was a very delicate time  
3 because my family were up in arms the  
4 fact I was told to be 52 kilograms,  
5 which is not -- it can't be achievable  
6 with my body frame, and they saw me  
7 getting very ill.

8 And I didn't have the funds  
9 to buy a flight back, so I had to do  
10 what Ghislaine and Jeffrey told me do.

11 Q. What did you do?

12 A. Continue to lose weight.

13 Q. Did you see any medical  
14 professionals while you were in South  
15 Africa?

16 A. No.

17 Q. How did you communicate to  
18 Jeffrey that you had decided to  
19 continue losing weight?

20 A. So Jeffrey, Ghislaine,  
21 again, we all corresponded by  
22 telephonic call, BBM, message, my  
23 house phone. I decided to lose  
24 weight. I was given an ultimatum that  
25 either I do it or I'm finished. At

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2 that point I had no option.

3 Q. If you wanted the flight  
4 back.

5 A. If I wanted the flight back.  
6 I had all my stuff in New York, I had  
7 my life in New York, I was going to  
8 FIT.

9 I didn't have any finances;  
10 Jeffrey was funding me. So I was  
11 stuck. I either had to do what  
12 Ghislaine and Jeffrey told me do or I  
13 was stuck, really.

14 Q. You were stuck at your  
15 father and stepmother's house in South  
16 Africa, where you grew up?

17 A. I didn't grow up with my  
18 father and my stepmother.

19 Q. You grew up in South Africa?

20 A. I grew up in Johannesburg.

21 Q. When you say you were stuck,  
22 you're describing a time you were in  
23 South Africa?

24 A. I'm describing a time I was  
25 on holiday visiting my family, that

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2 Jeffrey paid for.

3 Q. Okay. Did you finish your  
4 answer?

5 A. Sorry, I just read here.

6 I'm describing a time that I was on  
7 holiday visiting my family, that was  
8 paid for by Jeffrey and Ghislaine.

9 They financed my ticket. They  
10 financed every ticket. They financed  
11 my whole lifestyle.

12 Q. Ghislaine financed your  
13 ticket?

14 A. Well, they were one entity.  
15 Ghislaine is Jeffrey's right-hand  
16 woman. They --

17 Q. When did Ghislaine finance  
18 this ticket?

19 A. It was through Jeffrey's  
20 company that she worked with.

21 Q. Did you correspond by email  
22 with Ghislaine about financing this  
23 ticket?

24 A. No.

25 Q. You searched for emails with

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2 yourself and Ghislaine, correct?

3 A. That's correct.

4 Q. And you found none, correct?

5 A. That's correct.

6 Q. You found emails between  
7 yourself and Lesley Groff about the  
8 plane ticket back, correct?

9 A. That's correct.

10 Q. But none with Ghislaine?

11 A. I never said once today that  
12 I had email communication with  
13 Ghislaine.

14 Q. But you just said that  
15 Ghislaine financed your holiday in  
16 South Africa. And what is your basis  
17 for saying that?

18 MR. GUIRGUIS: Objection.

19 She did not say that Ghislaine  
20 financed it.

21 Q. What is your basis for  
22 referring to Ghislaine financing your  
23 holiday in South Africa?

24 MR. GUIRGUIS: Objection.

25 A. So Ghislaine is Jeffrey's

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2 right-hand man, so she -- so we report  
3 to her. I told them I wanted to go  
4 and see my family. They paid for my  
5 flight.

6 Q. You told them when they were  
7 together in the same place?

8 A. I can't remember the  
9 specific location. I just wanted to  
10 go on holiday to see my family, which  
11 Ghislaine and Jeffrey paid for.

12 Q. How did Ghislaine pay for  
13 it?

14 A. I don't know. You should  
15 ask Ghislaine.

16 Q. Did she write a check?

17 A. You should ask Ghislaine.

18 Q. Did she put it on a credit  
19 card?

20 MR. GUIRGUIS: Objection.

21 A. You should ask Ghislaine.

22 Q. Do you have any idea how  
23 Ghislaine Maxwell paid for your trip  
24 to South Africa?

25 MR. GUIRGUIS: Objection.

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2 A. You should ask Ghislaine.  
3 Q. Is that an answer?  
4 MR. GUIRGUIS: Objection.  
5 Q. Do you have an answer?  
6 MR. GUIRGUIS: Objection.  
7 A. You should ask Ghislaine how  
8 she funded my ticket.  
9 Q. I appreciate the tip.  
10 Do you have any information  
11 inside of your head about how  
12 Ghislaine financed your trip to South  
13 Africa?  
14 MR. GUIRGUIS: Counsel, she  
15 has repeatedly stated that she  
16 does not know. You keep asking  
17 her the same question.  
18 MS. MENNINGER: No, she has  
19 repeated to he me that she  
20 needed -- I needed to ask my  
21 client.  
22 MR. GUIRGUIS: Hold on.  
23 "QUESTION: Ghislaine funded  
24 your ticket?  
25 "ANSWER: Well, she was his

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1 HIGHLY CONFIDENTIAL AEO  
2 right-hand...  
3 "QUESTION: When did  
4 Ghislaine finance this ticket?

5 "ANSWER: Well, it was  
6 through Jeffrey's company that  
7 she worked with."

8 Are you asking a different  
9 question, Counsel? Am I  
10 misunderstanding?

11 MS. MENNINGER: Yeah, you  
12 are.

13 MR. GUIRGUIS: Please.

14 MS. MENNINGER: Can you read  
15 the question that I asked.

16 (Requested portion of the  
17 record was read back.)

18 A. In my head, I can't remember  
19 how she financed, how she and Jeffrey  
20 financed.

21 Q. Did you see any invoice paid  
22 by Ghislaine for your ticket?

23 A. No. But a ticket was  
24 produced which enabled me to fly back  
25 to my family, so a ticket was produced

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1 HIGHLY CONFIDENTIAL AEO  
2 by Ghislaine and Jeffrey in order for  
3 me to fly home to see my family.

4 Q. How did Ghislaine produce a  
5 ticket to you?

6 A. I can't remember.

7 Q. Did it come by email?

8 MR. GUIRGUIS: Objection.

9 A. I've provided all the emails  
10 that I have.

11 Q. That's not the question.

12 Did the ticket get produced  
13 to you by Ghislaine by email?

14 MR. GUIRGUIS: Objection.

15 A. No.

16 Q. Did it get sent by a courier  
17 to you from Ghislaine?

18 MR. GUIRGUIS: Objection.

19 A. I can't remember how I  
20 received the ticket specifically.

21 Q. Your final line to Pam is,  
22 "You must save some partying energy  
23 for me when I come back. Lots of  
24 love, Sarah."

25 Correct?

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1 HIGHLY CONFIDENTIAL AEO

2 A. Mm-hmm.

3 Q. Is that right?

4 A. Mm-hmm.

5 Q. In the first paragraph, do  
6 you advise Sarah, "Still very loved  
7 up, so much so that he asked me to  
8 move in with him and I accepted. All  
9 good," exclamation point, exclamation  
10 point, exclamation point -- well,  
11 about eight of them, or ten.

12 A. Mm-hmm.

13 Q. Is that what you wrote?

14 A. Yes, that's what you wrote.

15 Q. Is that true?

16 A. Yes.

17 Q. Looking back at Defendant's  
18 Exhibit 8, which you testified earlier  
19 were your communications with Nataly  
20 Malyshев, or some of them --

21 A. That's Exhibit 9.

22 MR. GUIRGUIS: We seem to be  
23 missing Exhibit 8 from the stack.

24 MS. MENNINGER: I checked it  
25 during the break.

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2 MR. GUIRGUIS: It's just out  
3 of order.4 THE WITNESS: Is this  
5 Defendant's Exhibit 8?

6 MS. MENNINGER: Eight.

7 THE WITNESS: Is this  
8 Exhibit 8?

9 MR. GUIRGUIS: Yes, it is.

10 Q. So the emails with Malyshev.  
11 Maybe I wrote it down wrong. I  
12 apologize.13 MR. GUIRGUIS: With who?  
14 I'm sorry?

15 MS. MENNINGER: Nataly --

16 THE WITNESS: That was  
17 Exhibit -- oh, gosh. This is  
18 Exhibit 9 between Natalya and  
19 myself.20 Q. Okay. And it's got RANSOME  
21 0004 and 0005; is that right? Just  
22 making sure we're looking at the same  
23 thing. On the lower right-hand  
24 corner.

25 A. Yes, 000004.

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2 Q. All right. Those are emails  
3 that you and Nataly exchanged in  
4 February of 2007, correct?

5 A. That's correct.

6 Q. And can you read to us the  
7 email at the bottom from you to Nataly  
8 on February 8, 2007.

9 A. "Hey sweetie, how are you?  
10 I'm busy writing my essay for FIT.  
11 What fun. I had a bit of a fight with  
12 Jeffrey. Oh, well, what can you do.  
13 I meant to ask in my last email can  
14 you please email me your address. It  
15 looks like I'm not going to Miami  
16 either. Well, at least I will be back  
17 in NY. Hope you are well and look  
18 forward to seeing you soon. Please  
19 tell Jennifer I say hi. Lots of hugs  
20 and kisses, Sarah."

21 Q. Were you writing your FIT  
22 essay in February 2007 while you were  
23 in South Africa?

24 A. Yeah. It took me quite some  
25 time writing my essay, so it was over

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2 a duration of...

3 Q. Did you email your essay  
4 from South Africa to Ghislaine  
5 Maxwell?

6 A. I don't recall emailing her.

7 Q. Defendant's Exhibit 10, I  
8 think it is, with Lesley Groff?

9 A. Yes.

10 MR. GUIRGUIS: Hold on a  
11 second. Let me just find my  
12 copy.

13 Q. And I show RANSOME 006 is  
14 the first one in the lower right-hand  
15 corner.

16 A. Yes.

17 Q. So did you correspond with  
18 Lesley about faxing your FIT  
19 application in to her on or about  
20 February 8, 2007?

21 A. Yes.

22 Q. Did you also ask her to look  
23 into booking a flight for you back to  
24 New York?

25 A. That's correct.

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2 Q. Did you give her the date  
3 you wanted to fly back?

4 A. That's correct.

5 Q. And the next email down, did  
6 you say, "Hi, can you please phone  
7 back?"

8 A. Mm-hmm.

9 Q. Was that to Lesley or to  
10 Jeffrey?

11 A. I can't remember who it was  
12 to. Jeffrey never corresponded  
13 directly; he either did it through  
14 Lesley Groff or -- so I can't remember  
15 who phoned me back.

16 Q. Can you turn two pages back  
17 to where it says RANSOME\_0009.

18 Do you see those emails?

19 A. Mm-hmm.

20 MR. GUIRGUIS: Read the  
21 emails, don't just...

22 Q. Did Lesley ask what type of  
23 visa you were coming on, student or  
24 tourist?

25 MR. GUIRGUIS: Hold on,

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2 Counsel.

3 Are you through with it?

4 THE WITNESS: Sorry, I

5 haven't finished reading yet.

6 Q. Did Lesley ask what type of  
7 visa you were coming on, student or  
8 tourist?

9 A. That's correct.

10 Q. And what was your response?

11 A. I can't remember what my  
12 response was.

13 Q. Is it visible in this  
14 exhibit?

15 A. No.

16 Q. All right. You said you  
17 left New York in late April --

18 A. That's correct.

19 Q. -- 2007?

20 Did you find any records  
21 reflecting that departure when you  
22 were going through all of your emails  
23 and your other documents?

24 A. No.

25 Q. When was the last time you

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2 saw Jeffrey Epstein?

3 A. April 2007.

4 Q. Where did you see him last?

5 A. In New York.

6 Q. Where in New York?

7 A. I can't remember where I

8 last saw him.

9 Q. Do you remember what  
10 happened the last time you saw him?

11 A. No, I can't remember what  
12 happened.

13 Q. Do you know whether he gave  
14 you any money the last time you saw  
15 him?

16 A. No, he didn't give me money.

17 Q. Do you know if you talked  
18 about FIT the last time you saw him?

19 A. I didn't really want  
20 anything do with Jeffrey and Ghislaine  
21 at that stage. So at that point I did  
22 not talk about FIT anymore with them.  
23 I just wanted to go back home to my  
24 mom.

25 Q. And this is when you were

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2 living with Adam?

3 A. Yes.

4 Q. When did you decide you  
5 didn't want to have anything to do  
6 with Jeffrey Epstein?

7 A. After my trip to South  
8 Africa, my relationship deteriorated  
9 with Jeffrey and Ghislaine. So I  
10 didn't really want to be here anymore.

11 Q. When did you make that  
12 decision?

13 A. I was kind of toying with  
14 the idea of going back. I was in a  
15 bit of a mess after what I had been  
16 through with Ghislaine and Jeffrey,  
17 so -- yeah.

18 Q. And who purchased your plane  
19 ticket to London?

20 A. I think it was my mom. I  
21 can't remember.

22 Q. Were you still taking the  
23 medications at the time you went back?

24 A. Yes.

25 Q. And you returned from South

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2 Africa in February 2007, correct?

3 A. That's correct.

4 Q. And that's when you made the  
5 decision to break with Jeffrey by  
6 moving in with Adam, correct?

7 A. I wanted to distance myself  
8 from Jeffrey. Things weren't great.  
9 What he was doing was wrong and what  
10 he was doing to me was wrong, and I  
11 got pretty depressed about it. I was  
12 in -- I was stuck in a dark hallway.  
13 I was basically being abused by a man,  
14 and I -- I didn't -- I didn't know  
15 what to do, where to go.

16 Q. Did you have a bank account  
17 in New York?

18 A. Yes, I did.

19 Q. With which bank?

20 MR. GUIRGUIS: Objection.

21 Same objection I gave at the  
22 beginning, financial information  
23 for a nonparty witness.

24 MS. MENNINGER: The name of  
25 the bank. The name of the bank.

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2 Q. Let me ask you this: What  
3 did you do with the cash you received  
4 from Jeffrey Epstein? Did you put it  
5 in the bank?

6 A. No. I spent it on food,  
7 cabs. General expenses.

8 Q. Where did you get the money  
9 that you put into the bank?

10 A. From the occasional modeling  
11 job that I got, freelance modeling.

12 Q. Were you still modeling in  
13 the spring of 2007?

14 A. No.

15 MR. GUIRGUIS: Off the  
16 record.

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

19 MR. GUIRGUIS: Back on the  
20 record.

21 MS. MENNINGER: I think if  
22 you can just give my co-counsel  
23 and I a minute off the record.

24 (Time noted: 6:28 p.m.)

25 (Recess.)

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2 (Time noted: 6:29 p.m.)

3 Q. In February of 2007, you

4 decided to make a break with Jeffrey

5 Epstein, correct?

6 A. No, I didn't decide to make

7 a break with Jeffrey Epstein. He let

8 me down with my FIT application and he

9 wasn't taking me seriously, and he

10 wasn't following through his end of

11 the deal, basically.

12 Q. How did he let you down with

13 your FIT application?

14 A. Because I didn't go to FIT.

15 Q. And why didn't you go to

16 FIT?

17 A. Because I wanted to go home

18 back to my mom.

19 Q. When did you decide that he

20 let you down with the FIT application?

21 A. Well, I think it was pretty

22 much after that incident with Alan and

23 the fact that I had been sexually

24 abused for months on end by Jeffrey, I

25 kind of wanted to call it time with

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2 him.

3 I saw how he was acting with  
4 the other girls. I saw how they got  
5 pretty mentally messed up as well; for  
6 example, [REDACTED]. So...

7 Q. And you saw that before you  
8 went to South Africa?

9 A. Yes.

10 Q. And while you were in South  
11 Africa, you got in a fight with  
12 Jeffrey.

13 A. That's correct.

14 Q. And you didn't want to lose  
15 this weight, correct?

16 A. I didn't want to lose this  
17 weight because I would be dead if I  
18 weighed 52 kilograms.

19 Q. You didn't want to lose the  
20 weight in South Africa, correct?

21 A. I wanted to -- I was  
22 desperate to go to FIT. I tried to  
23 lose as much weight as I could for  
24 Jeffrey and Ghislaine.

25 Q. While you were in South

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2 Africa, you did some reevaluating of  
3 your life?

4 MR. GUIRGUIS: Objection.

5 A. Reevaluating of my life? I  
6 wouldn't say I spent the holiday  
7 reevaluating my life, no.

8 Q. Were you happy when you were  
9 in South Africa?

10 A. I was concerned because I  
11 was being asked and being hounded to  
12 find a 18-year-old PA for Jeffrey, and  
13 I knew that was wrong because he would  
14 do exactly the same thing to that girl  
15 that he did to me, and I would not let  
16 him do that to another girl.

17 Q. So when you were in South  
18 Africa, you decided to make a break  
19 from Jeffrey.

20 MR. GUIRGUIS: Objection.

21 A. I didn't decide to make a  
22 break; I decided to distance myself  
23 from Jeffrey. Not make a break, but  
24 to distance myself.

25 Q. When you came back, you

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2 moved in with Adam?

3 A. That's correct.

4 Q. You can't remember the last  
5 time that you saw Jeffrey?

6 MR. GUIRGUIS: Objection.

7 That's not the testimony.

8 A. No.

9 MS. MENNINGER: No further  
10 questions. Thank you.

11 THE WITNESS: Thank you.

12 MS. MENNINGER: Do you have  
13 any?14 MR. GUIRGUIS: Give me one  
15 second to confer.

16 We have no questions.

17 MS. MENNINGER: Counsel,  
18 we're going to, unfortunately,  
19 before we go off the record, need  
20 to leave the deposition open,  
21 just because there are some email  
22 documents that were referenced  
23 but not produced. And we can  
24 follow up and have a discussion  
25 with counsel about that.

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1 HIGHLY CONFIDENTIAL AEO  
2 MR. GUIRGUIS: Okay. So on  
3 the record -- we can carry on the  
4 conversation, certainly, off the  
5 record.

6 But while we're on the  
7 record, I will say that my  
8 understanding is that those  
9 documents were all produced to  
10 you, including all the emails  
11 that you asked her about, and  
12 where are the missing emails, and  
13 she kept saying they'd been  
14 produced to her attorneys. My  
15 understanding is that the  
16 attorneys did provide them to  
17 defense counsel.

18 MS. MENNINGER: Well,  
19 there's a current passport that  
20 we know was not produced, there  
21 is an FIT application that we  
22 know was not produced, and I  
23 believe there are emails that  
24 were not produced.

25 And I'm happy to have the

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2 conversation continue off the  
3 record, but I'm telling you those  
4 are some of my recollections.

5 MR. GUIRGUIS: Okay. And to  
6 be clear so that I'm not  
7 misrepresenting, I see that I  
8 said there were documents and the  
9 emails. I meant to clarify, as  
10 in the emails I know were  
11 produced.

12 I can't speak to any other  
13 documents that you might want to  
14 raise a dispute about. But with  
15 respect to the emails that you  
16 said, my understanding, at least  
17 as I sit here, is that they were  
18 produced.

19 That said, I think we can go  
20 off the record and resolve any  
21 other issues between counsel and  
22 I.

23 (Time noted: 6:34 p.m.)

24

25

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1 HIGHLY CONFIDENTIAL AEO

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SARAH RANSOME

4

5 Signed and subscribed to  
before me, this \_\_\_\_\_ day  
6 of \_\_\_\_\_ 2017.

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Notary Public

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## 2 C E R T I F I C A T E

3 STATE OF NEW YORK )

4 :  
5

6 COUNTY OF NEW YORK)

7

8 6 I, Jeremy Richman, a Notary Public  
9 within and for the State of New York, do hereby  
10 certify:11 9 THAT SARAH RANSOME, the witness  
12 whose deposition is hereinbefore set forth, was  
13 duly sworn by me and that such deposition is a  
14 true record of the testimony given by such  
15 witness.16 14 I further certify that I am not  
17 related to any of the parties to this action by  
18 blood or marriage; and that I am in no way  
19 interested in the outcome of this matter.20 18 IN WITNESS WHEREOF, I have hereunto  
21 set my hand this 19th day of February 2017.

A handwritten signature in black ink, appearing to read "Jeremy Richman", is written over a white rectangular background that is partially visible behind the circular logo.

22 Jeremy Richman

23

24

25

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3	EXAMINATION BY
4	MS. MENNINGER 7
5	P.M. Session 199
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7	EXHIBITS MARKED
8	(Defendant's Exhibit 1, hand-drawn 128
9	picture marked for identification.)
10	(Defendant's Exhibit 2, hand-drawn 149
11	picture, was marked for
12	identification.)
13	(Defendant's Exhibit 3, affidavit, 262
14	was marked for identification.)
15	(Defendant's Exhibit 4, 274
16	RANSOME_000168, was marked for
17	identification.)
18	(Defendant's Exhibit 5, jury trial 323
19	demand, was marked for
20	identification.)
21	(Defendant's Exhibit 6, Bates 335
22	stamped Ransome_000017, was marked
23	for identification.)
24	(Defendant's Exhibit 7, Bates 339
25	stamped Ransome_000204, was marked

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1 for identification.) 363  
2 (Defendant's Exhibit 8, Notice of  
3 Service of Rule 45 Subpoena and  
4 Notice of Deposition of Sarah  
5 Ransome, was marked for  
6 identification.) 377  
7 (Defendant's Exhibit 8, Bates  
8 stamped RANSOME\_000004, was marked  
9 for identification.) 384  
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11 stamped RANSOME\_000006, was marked  
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14 Callahan article, was marked for  
15 identification.) 389  
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17 printout titled How to Apply, was  
18 marked for identification.) 393  
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20 stamped RANSOME\_000007 was marked  
21 for identification.)  
22  
23 QUESTIONS INSTRUCTED NOT TO ANSWER  
24 do you have any source of income? 10  
25 so I'm going to ask you a last 12

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1 time: Do you have any source of  
2 income? 13  
3 what is your partner's occupation? 13  
4 and where do your parents live? 14  
5 Ms. Ransome, there was a question 15  
6 pending when you took a break with  
7 your lawyers. Can you please  
8 answer the question.  
9 what is your partner's cell phone 28  
10 number?  
11 and you're staying where while 31  
12 you're here?  
13 have you been promised that you 34  
14 would have counsel to help you  
15 bring a lawsuit against a number of  
16 people?  
17 what's the private legal matter? 172  
18 what did you talk about with Alan 184  
19 Dershowitz?  
20 did you sign a common interest 185  
21 agreement with Jeffrey?  
22 did he do anything in terms of 199  
23 contacting anyone on your behalf?  
24 what was the specific legal matter 199  
25 that you were seeking

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1 representation for? 204  
2 who prescribed it to you? 241  
3 so please tell me how to reach your  
4 stepmother, Linda Ransome. 284  
5 when did you see that? 363  
6 when did you provide them to your  
7 counsel?  
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