

# EXHIBIT 46

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 SATURDAY, JUNE 10, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 \*\*CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER\*\*

20 - - -

21 Videotaped deposition of James E.  
22 Staley, held at the offices of Boies Schiller  
23 Flexner, LLC, 55 Hudson Yards, New York, New  
24 York, commencing at 9:13 a.m. Eastern, on the  
25 above date, before Carrie A. Campbell,  
Registered Diplomat Reporter and Certified  
Realtime Reporter.

- - -

GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1 QUESTIONS BY MS. LIU:

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

7 A. My recollection is yes.

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

11 A. I don't recall.

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

15 A. I don't recall the exact  
16 conversation.

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

21 A. That's correct.

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

25 A. Yes.

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

4 A. No.

5 Q. Do you recall where the  
6 conversation took place?

7 A. No.

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

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

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

18 A. In 2006?

19 Q. Yes.

20 A. I don't believe so.

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

24 A. My recollection is it was by  
25 phone.

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

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

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

10 A. I don't recall.

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

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

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

21 A. I don't recall.

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

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

3 A. I would imagine so.

4 MR. GAIL: Objection.

5 QUESTIONS BY MS. LIU:

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

9 A. That's fair.

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

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

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

20 A. I believe so.

21 Q. And tell me about that.

22 MR. GAIL: Objection.

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

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

3       QUESTIONS BY MS. LIU:

4           Q.       And was that in or about the  
5       2000 time period?

6           A.       Yes.

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

10          A.       That's correct.

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

13          A.       That's correct.

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

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

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

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

25          A.       Yes.

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

4 A. I would imagine I did, yes.

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

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

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

12 A. I don't know.

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

16 A. No, I did not.

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

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

25 Q. But you were the head of the



1 Do you see that?

2 A. Yes.

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

5 A. I don't know.

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

8 A. It appears so.

9 (Staley Exhibit 5 marked for  
10 identification.)

11 QUESTIONS BY MS. LIU:

12 Q. Okay. You can put that  
13 document away.

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

18 You recall that, correct?

19 A. Yes.

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

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

1 Do you see that?

2 A. Yes.

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

6 Do you see that?

7 A. Yes, I do.

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

12 A. Correct.

13 Q. You can put that document away.

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

18 A. That's fair.

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

22 Is that correct?

23 A. That's correct.

24 MR. GAIL: Objection.

25

1 QUESTIONS BY MS. LIU:

2 Q. And among these clients are  
3 Sergey Brin?

4 A. Yes.

5 Q. Google LLC?

6 A. Yes.

7 Q. Sultan Ahmed bin Sulayem?

8 A. Yes.

9 Q. Ehud Barak?

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

12 Q. Peter Mandelson?

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

15 Q. Mort Zuckerman?

16 A. Yes.

17 Q. [REDACTED]

18 A. I believe so.

19 Q. Highbridge Capital Management  
20 which we discussed?

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

24 Q. Glenn Dubin?

25 A. Same answer.

1 Q. Kathryn Ruemmler?

2 A. Yeah, I don't know.

3 Q. Bill Gates?

4 A. Yes.

5 Q. Leon Black?

6 A. Same as Glenn. I don't know  
7 how I first met Leon.

8 Q. David Gergen?

9 A. That's correct.

10 Q. Boris Nikolic?

11 A. Yes.

12 Q. Larry Summers?

13 A. Yes.

14 Q. Nathan Myhrvold with Microsoft?

15 A. Yeah, I know Nathan. I don't  
16 know -- same answer. I don't know whether  
17 Epstein introduced Nathan or not.

18 Q. Kimbal Musk?

19 A. I didn't know Kimbal Musk.

20 Q. Elon Musk?

21 A. Yes.

22 Q. Les Wexner?

23 A. No.

24 Q. Because Les Wexner, as you  
25 described, was working with JPMorgan to take

1 The Limited public?

2 A. That's correct.

3 Q. George Mitchell?

4 A. I don't know.

5 Q. Bill Richardson?

6 A. Yes.

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

10 A. That's fair.

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

14 A. I met Ehud Barak. I don't know  
15 if he set up meetings with other people from  
16 Morgan.

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

19 MR. GAIL: Objection.

20 THE WITNESS: I don't recall.

21 QUESTIONS BY MS. LIU:

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

1 MR. GAIL: Triple objection.

2 QUESTIONS BY MS. LIU:

3 Q. You can answer, sir.

4 A. Ask the question again?

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

8 MR. GAIL: Objection.

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

11 QUESTIONS BY MS. LIU:

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

14 A. I don't know.

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

19 A. That's correct.

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

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

25 Q. And do you know if Mr. Dimon

1 ever met or -- I'll rephrase.

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

4 A. I don't know.

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

9 A. That's fair.

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

13 A. I don't recall.

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

16 A. Yes.

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

20 A. Yes.

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

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

1           A.       Dubai is a country, not his  
2     name.

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

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

7           A.       Yes.

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

13          A.       Yes.

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

19          A.       Yes.

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

23          A.       Yes.

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



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

4 A. Yes.

5 Q. You also met with Larry  
6 Summers, correct?

7 A. Correct.

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

13 A. Yes.

14 VIDEOGRAPHER: Mimi, can we  
15 pause one moment?

16 MS. LIU: Sure.

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

20 MS. LIU: Can we go off the  
21 record?

22 VIDEOGRAPHER: Stand by.

23 11:07. We are off the video record.

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

25 VIDEOGRAPHER: 11:09, we are on

1 the video record.

2 (Staley Exhibit 6 marked for  
3 identification.)

4 QUESTIONS BY MS. LIU:

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

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

10 Do you see that?

11 A. Yes.

12 Q. Okay. And he's forwarding a  
13 message from Sultan bin Sulayem dated May 5,  
14 2014.

15 Do you see that?

16 A. Yes.

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

21 A. Yes.

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

1 A. I don't know.

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

4 A. I believe it is Dubai Port.

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

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

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

15 A. No, I'm not aware.

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

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

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

25 Q. But Ovitz had some connection

1 to Jeffrey Epstein; is that fair?

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

4 Q. What about Andrew Farkas?

5 A. I believe so.

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

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

10 Q. Prince Andrew?

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

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

16 A. Yes.

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

21 A. I am not aware of that.

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

1 Jeffrey Epstein brought to the bank?

2 A. I don't know.

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

6 QUESTIONS BY MS. LIU:

7 Q. You can answer the question.

8 A. Can you ask the question again?

9 Q. Yes.

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

15 MR. GAIL: Objection.

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

21 QUESTIONS BY MS. LIU:

22 Q. You can answer the question.

23 A. So ask again?

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

1 Mr. Dimon had any independent relationship  
2 with Prince Andrew?

3 MR. GAIL: Objection.

4 THE WITNESS: I don't know.

5 QUESTIONS BY MS. LIU:

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

8 MR. GAIL: Objection.

9 Not aware of any relationship.

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

12 QUESTIONS BY MS. LIU:

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

16 A. No.

17 MR. SULLIVAN: I'll let him  
18 know if that occurs.

19 MR. GAIL: We don't profess  
20 otherwise.

21 QUESTIONS BY MS. LIU:

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

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

1 on this."

2 Do you see that?

3 A. Yes.

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

7 Do you see that?

8 A. Yes.

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

12 A. No, not specifically here.

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

18 A. I was not part of these  
19 conversations.

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

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

25 Q. Okay. You can put that

1 of your meeting or relationship with Darling?

2 A. Not that I know of, no.

3 Q. Okay.

4 A. Or not that I recall, no.

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

10 This is a reference to Peter  
11 Mandelson?

12 A. I believe so.

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

15 A. Yes.

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

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

19 Q. If we go down to the last  
20 bullet point on that page, it's talking about  
21 an individual named Thomas -- Tom Pritzker.

22 Do you know who that is?

23 A. Yes.

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



1           A.       I believe so.

2           Q.       And did Tom Pritzker ever  
3       become a client of JPMorgan?

4           A.       I believe he did.

5           Q.       When Jeffrey Epstein made these  
6       connections, in this instance, such as the  
7       one with Tom Pritzker, was Jeffrey Epstein  
8       ever paid as a consultant, an advisor, or any  
9       other way for making that connection?

10          A.       Not that I'm aware of, no.

11          Q.       As you sit here now, do you  
12       understand why it was that Jeffrey Epstein  
13       would go through the effort of making the  
14       connection for you with somebody like Tom  
15       Pritzker?

16          A.       Again, I think he valued his  
17       network of contacts, and introducing me to  
18       Tom, vice versa, enhanced that network for  
19       him.

20          Q.       A connection such as Tom  
21       Pritzker was valuable to JPMorgan, right?

22          A.       True. Yes.

23          Q.       And a -- and that connection  
24       was then likely valuable for Tom Pritzker,  
25       right?

1 A. No.

2 Q. Did you understand him to have  
3 a massage room at his home?

4 A. Yes.

5 Q. Were you given a tour of his  
6 home where you saw the massage room?

7 A. A tour of the whole house.  
8 His main living room was on the second floor,  
9 and I think that's where the room was.

10 Q. So did he show you the massage  
11 room?

12 A. I don't know whether he -- I  
13 just -- whether I just saw it in passing.

14 Q. Did you take the elevator up to  
15 the massage room?

16 A. No.

17 Q. The stairs?

18 A. Yes.

19 Q. Okay.

20 A. Well, not to the massage room.  
21 I took the stairs up to the second floor.

22 Q. Were there other individuals  
23 that you remember by name having met at  
24 Jeffrey Epstein's townhouse?

25 A. Ask it again?

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

5 A. Yes.

6 Q. Who?

7 A. Bill Gates.

8 Q. Okay.

9 A. Leon Black. Katie Couric. Eva  
10 Dubin. [REDACTED]

11 Q. [REDACTED]

12 A. Yeah, I believe so.

13 Q. Okay.

14 A. Larry and Sergey Brin. The  
15 Sultan.

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

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

22 A. Yes.

23 Q. And who?

24 A. Lesley Groff.

25 Q. What did you understand Lesley

1 Groff's position to be?

2 A. His secretary.

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

7 A. Right.

8 Q. Okay.

9 A. Eva Dubin.

10 Q. What did you understand her  
11 relationship to be as it related to Jeffrey  
12 Epstein, aside from being Glenn Dubin's wife?

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

15 Q. A long time in the past, right?

16 A. Yes.

17 [REDACTED]

18 Q. What did you understand [REDACTED]  
19 [REDACTED]'s role to be?

20 A. She was one of his assistants.

21 Q. Okay. How many times do you  
22 remember meeting [REDACTED]?

23 A. A number of times.

24 Q. Okay. Anybody else?

25 A. He had a couple that took care

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

2 Q. Jo Jo Fontanella?

3 A. I don't remember their names.

4 Q. Okay.

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

7 Q. Did you meet [REDACTED]?

8 A. Yes. Sorry.

9 Q. And in what context did you  
10 meet [REDACTED]?

11 A. She was also one of his  
12 assistants.

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

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

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

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

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK  
3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )  
5 )  
6 Plaintiff, )  
7 )  
8 vs. ) 1:22-cv-10904-JSR  
9 )  
10 JPMORGAN CHASE BANK, N.A., )  
11 )  
12 Defendant/Third- )  
13 Party Plaintiff. )  
14 )  
15 JPMORGAN CHASE BANK, N.A. )  
16 )  
17 Third-Party )  
18 Plaintiff, )  
19 )  
20 vs. )  
21 )  
22 JAMES EDWARD STALEY, )  
23 )  
24 Third-Party )  
25 Defendant. )

14  
15 SUNDAY, JUNE 11, 2023  
16 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER  
17 - - -  
18 Videotaped deposition of James E.  
19 Staley, Volume II, held at the offices of  
20 Boies Schiller Flexner, LLC, 55 Hudson Yards,  
21 New York, New York, commencing at 9:07 a.m.  
22 Eastern, on the above date, before Carrie A.  
23 Campbell, Registered Diplomate Reporter and  
24 Certified Realtime Reporter.  
25

23 - - -  
24 GOLKOW LITIGATION SERVICES  
25 877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1 A. No.

2 Q. If I asked you the question --

3 A. I don't recall how many times.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

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21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Confidential Pursuant to Protective Order

1 [REDACTED]

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| Rank | Country        | Percentage |
|------|----------------|------------|
| 1    | United States  | 23%        |
| 2    | France         | 77%        |
| 3    | Germany        | 77%        |
| 4    | United Kingdom | 53%        |
| 5    | Italy          | 33%        |
| 6    | Spain          | 67%        |
| 7    | Japan          | 43%        |
| 8    | Canada         | 67%        |
| 9    | Sweden         | 23%        |
| 10   | Australia      | 67%        |
| 11   | South Korea    | 23%        |
| 12   | India          | 67%        |
| 13   | China          | 77%        |
| 14   | Brazil         | 77%        |
| 15   | Russia         | 77%        |
| 16   | Mexico         | 23%        |
| 17   | Argentina      | 53%        |
| 18   | Colombia       | 77%        |
| 19   | Peru           | 23%        |
| 20   | Venezuela      | 67%        |
| 21   | Chile          | 23%        |
| 22   | Ecuador        | 23%        |
| 23   | Costa Rica     | 53%        |
| 24   | Panama         | 53%        |
| 25   | Uruguay        | 77%        |

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19 [REDACTED] [REDACTED]

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21 [REDACTED]

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25 [REDACTED]

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

3 A. I don't recall.

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

6 A. Yes.

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

10 A. No.

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

15 Do you remember that?

16 A. Yes.

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

20 Do you remember that? Those  
21 being the allegations?

22 A. In what year are you talking  
23 about?

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

1 in 2008.

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

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

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

11 A. Yes.

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

18 Do you remember that?

19 A. Yes.

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

23 A. That's correct.

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



1 A. That's right.

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

6 A. Correct.

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

10 A. Right.

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

18 A. Right.

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

23 A. Yes.

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

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

6             A.       That's correct.

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

13            A.       Yes.

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

18                    Do you remember that?

19            A.       Yes.

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

25                    Do you remember that?