

# EXHIBIT 36

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,  
Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of  
MARYANNE RYAN taken pursuant to notice,  
was held at BOIES SCHILLER FLEXNER LLP,  
commencing May 24, 2023, 9:39 a.m., on  
the above date, before Leslie Fagin, a  
Court Reporter and Notary Public in the  
State of New York.

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2 Q. And then who is Rick Seba? 09:53:32

3 A. Rick was a counterparty of mine 09:53:36

4 when I joined the bank who was the same as I 09:53:41

5 was, just for another line of business. 09:53:47

6 Q. Why would you have been cc'd on 09:53:49

7 this email? 09:53:53

8 MR. KRAUSE: Objection. 09:53:54

9 A. James would have sent up emails to 09:53:56

10 us, and I was fairly new at the bank so he 09:54:06

11 included myself and others that did things 09:54:13

12 for the private bank in this email. 09:54:17

13 [REDACTED] 09:54:19

14 [REDACTED] 09:54:23

15 [REDACTED] 09:54:28

16 [REDACTED] 09:54:30

17 [REDACTED] 09:54:32

18 [REDACTED] 09:54:37

19 [REDACTED] 09:54:43

20 Q. Looking in the message portion of 09:54:44

21 the email, where it says, News/Sonar Cash 09:54:46

22 Rpts. 09:54:46

23 What is your understanding of the 09:54:53

24 meaning of that? 09:54:55

25 A. Sonar was an alerting engine that 09:54:57

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2 A. I do. 10:47:56

3 Q. Why did you write, I don't want to 10:47:56

4 forget about this guy? 10:48:00

5 A. I don't recall this email. But 10:48:01

6 clearly I didn't talk to Phil yet, so I 10:48:07

7 reminded him we want to talk. 10:48:10

8 Q. Is it possible that this was 10:48:12

9 important to you because you did not often 10:48:16

10 work with clients that were convicted felons? 10:48:18

11 MR. KRAUSE: Objection. 10:48:21

12 A. No. I think we were a little busy 10:48:22

13 around this time at JPMorgan. 10:48:25

14 Q. We are going to move up the chain 10:48:28

15 again, this time to an email written by you, 10:48:30

16 Maryanne Ryan, December 1, 2010 at 10:48 a.m. 10:48:33

17 And you write in response to Phil 10:48:39

18 DeLuca: Yes, in the PB and approved to stay 10:48:44

19 after his criminal conviction by Cutler. My 10:48:47

20 fear is will all our touting of goodwill on 10:48:51

21 the HT work, if anyone should ever say yet we 10:48:54

22 bank Epstein, a known child sleaze. 10:48:59

23 Do you see that? 10:49:03

24 A. I do. 10:49:03

25 Q. What is the HT work? 10:49:04

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2 A. It was a project that was going on 10:49:09  
3 within investigations related to human 10:49:13  
4 trafficking and certain typology work that 10:49:21  
5 they were looking to dig through to identify 10:49:28  
6 human trafficking. 10:49:34

7 Q. What did you mean by, our touting 10:49:36  
8 of goodwill? 10:49:39

9 A. Phil was involved and was given an 10:49:40  
10 award by someone with regards to some of the 10:49:51  
11 work the bank had done in the human 10:49:55  
12 trafficking space. 10:49:57

13 Q. Was that an award given by the bank 10:49:57  
14 or by an external organization? 10:50:00

15 A. External. 10:50:02

16 Q. When you call Epstein, a known 10:50:04  
17 child sleaze, what did you mean by that? 10:50:14

18 A. Clearly I was reading the articles 10:50:17  
19 that he was alleged to have done some 10:50:21  
20 inappropriate things, so I said it as I saw 10:50:24  
21 it. 10:50:27

22 Q. So your understanding at that time 10:50:28  
23 was that Epstein was a child sleaze? 10:50:31

24 MR. KRAUSE: Objection. 10:50:37

25 A. That's what I wrote. 10:50:38

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2 time as to whether the bank should have 11:19:59

3 retained Jeffrey Epstein as a client? 11:20:01

4 A. I believe I did at this time. 11:20:05

5 Q. What was that opinion? 11:20:08

6 A. I thought that Jeffrey Epstein 11:20:10

7 should go. 11:20:14

8 Q. By go, you mean that the bank 11:20:16

9 should no longer keep him as a client? 11:20:18

10 A. Correct. 11:20:20

11 Q. When you say, the sleazy PB client, 11:20:21

12 are you referring to the allegations of 11:20:28

13 sexual misconduct with children that you had 11:20:33

14 referred to in a previous email? 11:20:36

15 A. Likely, yes. 11:20:39

16 Q. Is there anything else you can 11:20:40

17 think of that you might have been referring 11:20:42

18 to when you said, the sleazy PB client? 11:20:44

19 A. No. 11:20:47

20 Q. Moving up to the next email from 11:20:48

21 Phil DeLuca to you, Maryanne Ryan, on January 11:20:52

22 6, 2011. 11:20:56

23 Do you see that? 11:21:03

24 A. I do. 11:21:03

25 Q. He writes, This is the guy who 11:21:03

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2 likes young girls, correct? Hope that they 11:21:07

3 do not cave!! 11:21:13

4 Do you see that? 11:21:17

5 A. I do. 11:21:17

6 Q. Based on that first sentence that 11:21:18

7 Phil DeLuca wrote to you, is it your 11:21:24

8 understanding that it was generally known at 11:21:28

9 the bank that Jeffrey Epstein was a guy who 11:21:31

10 likes young girls? 11:21:35

11 MR. JOHNSON: Objection. 11:21:38

12 MR. KRAUSE: Objection. 11:21:39

13 A. I don't know generally known at the 11:21:39

14 bank. Phil and I had the exchange, we were 11:21:42

15 on the same page. 11:21:47

16 Q. And Phil was your direct report, is 11:21:49

17 that correct? 11:21:55

18 A. I reported directly to Phil. 11:21:55

19 [REDACTED] 11:21:57

20 [REDACTED] 11:22:07

21 [REDACTED] 11:22:14

22 [REDACTED] 11:22:19

23 [REDACTED] 11:22:26

24 [REDACTED] 11:22:30

25 [REDACTED] [REDACTED] 11:22:33

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2 [REDACTED] 11:22:33

3 [REDACTED] 11:22:35

4 [REDACTED] 11:22:35

5 [REDACTED] 11:22:38

6 [REDACTED] 11:22:41

7 [REDACTED] 11:22:45

8 [REDACTED] 11:22:48

9 [REDACTED] 11:22:53

10 [REDACTED] 11:22:54

11 [REDACTED] 11:22:57

12 Q. It was your understanding at that 11:23:01

13 time that Jeffrey Epstein was not using any 11:23:03

14 bank accounts or wire services in his 11:23:06

15 exploitation of women or children? 11:23:11

16 MR. KRAUSE: Objection. 11:23:14

17 A. If I had thought, I would have 11:23:16

18 acted on it. 11:23:18

19 Q. When Phil says, I hope -- sorry, he 11:23:19

20 doesn't say I -- he says, Hope that they do 11:23:28

21 not cave. 11:23:32

22 What did you understand that to 11:23:32

23 mean? 11:23:34

24 A. We were presenting to the business 11:23:37

25 to tee it back up again to make a decision on 11:23:41



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2 retention. So Phil was of the mindset, as 11:23:44  
3 was I, that he had to go. 11:23:49

4 Q. Why did you think he had to go? 11:23:52

5 A. He was a reputational risk to the 11:23:57  
6 bank. 11:24:00

7 Q. Why was it a reputational risk to 11:24:01  
8 the bank? 11:24:04

9 A. Any client that would be 11:24:05  
10 consistently in the news for any variety of 11:24:10  
11 reasons would present reputational risk to 11:24:15  
12 the bank. 11:24:18

13 Q. But in this particular instance, 11:24:18  
14 what was the reputational risk to the bank? 11:24:20

15 A. There were allegations and there 11:24:23  
16 was a conviction about improper behavior with 11:24:25  
17 a minor. 11:24:30

18 Q. And at that time you believed those 11:24:35  
19 allegations? 11:24:39

20 MR. KRAUSE: Objection. 11:24:41

21 A. I had no firsthand knowledge. I 11:24:45  
22 was reading what I read in the paper, and I 11:24:47  
23 thought it was disturbing enough that the 11:24:50  
24 customer should be re-reviewed for exit 11:24:53  
25 determination by JPMorgan. 11:24:57

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2 exposed further, it would have a negative 11:48:48  
3 impact. 11:48:51

4 Q. So is your understanding of what 11:48:52  
5 you wrote that Catherine felt that more 11:48:55  
6 information about Epstein could be further 11:48:58  
7 exposed? 11:48:58

8 MR. KRAUSE: Objection. 11:49:05

9 A. I don't recall whether or not she 11:49:06  
10 stated something or this was an implied 11:49:07  
11 statement. 11:49:11

12 Q. But sitting here today, you view 11:49:13  
13 that the two potential options are she either 11:49:16  
14 could have stated something or implied 11:49:19  
15 something, but in either instance, the 11:49:21  
16 message she conveyed to you was that there 11:49:23  
17 was concern that more information could come 11:49:26  
18 out about Epstein's conduct? 11:49:29

19 MR. KRAUSE: Objection. 11:49:31

20 A. No. I think she was basically -- 11:49:32  
21 that she telling us -- us meaning Art and I, 11:49:36  
22 because we were from the representatives, 11:49:38  
23 that we needed to go to Jes. 11:49:41

24 Q. Okay. In the next sentence you 11:49:44  
25 say, Epstein was released in July from house 11:49:48

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2 arrest and the Palm Beach Post carried two 11:49:51  
3 articles saying DOJ may be investigating for 11:49:55  
4 child trafficking via a modeling agency he is 11:49:59  
5 part owner in. 11:50:04

6 Does this refresh your recollection 11:50:05  
7 that you may have been aware that Epstein was 11:50:06  
8 being investigated by a government agency in 11:50:10  
9 early 2011? 11:50:15

10 MR. KRAUSE: Objection. 11:50:19

11 MR. JOHNSON: Objection. 11:50:20

12 A. I'm reciting an article that 11:50:21  
13 alludes to an ongoing DOJ investigation. 11:50:23

14 Q. So you were aware it was possible 11:50:26  
15 that the DOJ was investigating Epstein at 11:50:28  
16 that time? 11:50:32

17 MR. KRAUSE: Objection. 11:50:32

18 A. That is what the press was 11:50:33  
19 reporting. 11:50:35

20 Q. When you wrote, via a modeling 11:50:42  
21 agency he is part owner in, do you know what 11:50:45  
22 modeling agency you were referring to? 11:50:48

23 A. It had initials -- I discovered 11:50:53  
24 there was some modeling agency for which the 11:51:01  
25 banker told me something about, M2, owned by 11:51:07

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2 a guy by the name Brunel, B-R-U-N-E-L. 11:51:23

3 Q. Then you write, I think Catherine 11:51:29

4 believes that after the briefing on HT that 11:51:33

5 Jes would need to point blank ask Jeffrey the 11:51:37

6 status of any criminal investigations. 11:51:42

7 Do you see that? 11:51:51

8 A. Yes. 11:51:51

9 Q. And by point blank, what did you 11:51:51  
10 mean? 11:51:56

11 A. Directly. 11:52:02

12 Q. Does that seem to violate what you 11:52:04  
13 stated several times today that during an 11:52:19  
14 investigation, the bank would not reach out 11:52:23  
15 to a client regarding any element of that 11:52:25  
16 investigation? 11:52:30

17 MR. KRAUSE: Objection. 11:52:31

18 A. I said we would not reach out. We, 11:52:32  
19 investigations, would not be in direct 11:52:34  
20 contact with a customer. Discussing 11:52:36  
21 something in the public domain by a banker is 11:52:39  
22 within and exactly what they should be doing. 11:52:41

23 Q. So just so I understand, if there 11:52:45  
24 is a fact that the investigation team needs 11:52:48  
25 to conduct its investigation but you don't 11:52:50

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2 A. He was a peer of mine. 13:51:06

3 Q. And the subject is Re: Weekly 13:51:07

4 update - December 1, 2011. Is that right? 13:51:16

5 A. Correct. 13:51:21

6 Q. So is the email below that you are 13:51:22

7 writing indicating your weekly update of 13:51:25

8 things you were working on at that time? 13:51:35

9 A. Correct. 13:51:37

10 Q. In December 2011, you included 13:51:38

11 Jeffrey Epstein review, is that right? 13:51:47

12 A. I did. 13:51:48

13 Q. What was that review in regards to? 13:51:49

14 A. I don't recall. 13:51:55

15 Q. Do you recall if any other of your 13:51:58

16 peers or members of the team that are 13:52:01

17 included on this email ever assisted you in 13:52:03

18 any way regarding Jeffrey Epstein review? 13:52:06

19 A. My peers would not have been 13:52:15

20 involved with Jeffrey Epstein. 13:52:16

21 MR. LAW: This is Exhibit 13, Bates 13:52:45

22 number JPM-SDNYLIT-00453044. 13:52:58

23 (Ryan Exhibit 13, Emails, marked 13:53:06

24 for identification.) 13:53:34

25 THE WITNESS: Okay. 13:53:34

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2 Q. So I direct you to the first email 13:53:34  
3 in the chain at the bottom of the page. It's 13:53:38  
4 an email from you, Maryanne Ryan, to William 13:53:41  
5 Langford on February 7, 2011, is that right? 13:53:44

6 A. Yes. 13:53:48

7 Q. There is no subject line, is that 13:53:48  
8 right? 13:53:51

9 A. There isn't. 13:53:51

10 Q. You write, I hear you are out of 13:53:52  
11 town as I am meeting Art in the a.m. at your 13:53:56  
12 office in the a.m., wanted to catch up on 13:53:59  
13 Epstein as he was the featured ripped from 13:54:05  
14 the headline story on Law and Order SVU this 13:54:11  
15 week. I also read that the State of New York 13:54:16  
16 in conjunction with Manhattan DA just two 13:54:19  
17 weeks ago ruled him a level 3, which is the 13:54:23  
18 highest you can be in New York. So if you 13:54:27  
19 have insomnia, you can watch the story over 13:54:30  
20 the internet. 13:54:34

21 Do you see that? 13:54:35

22 A. Yes. 13:54:35

23 Q. When you say Law and Order SVU, are 13:54:35  
24 you referring to Law and Order Special 13:54:40  
25 Victims Unit? 13:54:43

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2 A. The television show by that name, 13:54:44  
3 yes. 13:54:46

4 Q. Why did you think that Epstein was 13:54:47  
5 the featured ripped from the headline story 13:54:49  
6 on Law and Order SVU that week? 13:54:52

7 A. That entire series was based on 13:54:57  
8 real life stories, and it's never difficult 13:55:03  
9 to figure out, since I am a New Yorker, I 13:55:10  
10 knew exactly what this particular episode was 13:55:14  
11 on, and so I sent it to William so that he 13:55:16  
12 could see. 13:55:20

13 Q. In the episode do you recall them 13:55:20  
14 ever mentioning Jeffrey Epstein or in any way 13:55:22  
15 explicitly saying that the character 13:55:24  
16 portrayed was referencing Jeffrey Epstein? 13:55:28

17 A. I don't recall. 13:55:31

18 [REDACTED] 13:55:35

19 [REDACTED] 13:55:37

20 [REDACTED] 13:55:42

21 [REDACTED] 13:55:48

22 MR. KRAUSE: Objection. 13:55:53

23 A. [REDACTED] I saw it -- happened to see 13:55:53  
24 it, made sure I told William that a customer 13:55:58  
25 might have been the implied story that was 13:56:01

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2 out in the news. 13:56:04

3 Q. When you said the Manhattan DA just 13:56:07

4 two weeks ago ruled him a level 3 which is 13:56:11

5 the highest you can be in New York, what did 13:56:15

6 you mean by that? 13:56:17

7 A. We now had a registered sex 13:56:18

8 offender, in addition to being a convicted 13:56:22

9 felon as a customer. 13:56:25

10 [REDACTED] 13:56:27

11 [REDACTED] 13:56:32

12 [REDACTED] 13:56:35

13 [REDACTED] 13:56:39

14 MR. KRAUSE: Objection. 13:56:39

15 A. [REDACTED] I thought it was one more 13:56:40

16 piece of ammunition that might sway him being 13:56:42

17 terminated as a customer. 13:56:46

18 Q. Why would he have been terminated 13:56:48

19 as a customer? 13:56:50

20 A. Again, goes to reputational risk. 13:56:51

21 Q. Moving up to your email in the 13:57:00

22 chain, at 9:33 p.m., again to William 13:57:07

23 Langford. You write in the second sentence, 13:57:15

24 I typed SVU and his name and there is a 13:57:19

25 Gawker story, Law and Order commrates JE 13:57:23



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2 taste for teen hookers. 13:57:30

3 Do you see that? 13:57:33

4 A. Yes. 13:57:33

5 [REDACTED] 13:57:34

6 [REDACTED] 13:57:43

7 [REDACTED] 13:57:47

8 [REDACTED] 13:57:50

9 MR. KRAUSE: Objection. 13:57:53

10 A. It made me more anxious to get 13:57:56

11 Jeffrey Epstein out of the bank. 13:57:59

12 [REDACTED] 13:58:01

13 [REDACTED] 13:58:04

14 [REDACTED] 13:58:06

15 [REDACTED] 13:58:10

16 MR. KRAUSE: Objection. 13:58:11

17 A. I thought that all of these facts 13:58:15

18 had to be escalated to the business to make 13:58:18

19 an informed decision about getting him out of 13:58:20

20 the bank. I was of the opinion that he 13:58:23

21 should be out of the bank. 13:58:26

22 MR. LAW: This will be Exhibit 14, 13:59:12

23 with Bates JPM-SDNYLIT-00194162. 13:59:14

24 (Ryan Exhibit 14, Email Chain, 13:59:27

25 marked for identification.) 13:59:41

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2 There is not an obligation to review it on a 15:22:18  
3 daily basis, but they have to understand what 15:22:23  
4 is going on in their customer's accounts. 15:22:25

5 Q. Would the business review wire 15:22:28  
6 transactions for high risk clients with any 15:22:34  
7 proximity to when they were -- when those 15:22:41  
8 transactions occurred? 15:22:45

9 MR. KRAUSE: Objection. 15:22:46

10 A. What the business, and each 15:22:51  
11 business was different, has to do, all 15:22:54  
12 depended on the business. The -- if a 15:22:57  
13 customer was doing wire transactions in the 15:23:01  
14 private bank, those are facilitated by a 15:23:04  
15 blank employee. So the customer sends in 15:23:09  
16 instructions and they are verified with the 15:23:14  
17 customer and then the customer's information 15:23:15  
18 is input. 15:23:17

19 Private bank customers don't do 15:23:17  
20 their own execution. So if a customer calls 15:23:19  
21 in and does something bizarre, that would be 15:23:24  
22 a source of referral to investigations to 15:23:28  
23 tell us that they thought something was 15:23:31  
24 unusual about the customer's ask. 15:23:35

25 Q. So if there had been any suspicious 15:23:37

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2 wire activity, your team wouldn't be made 15:23:40

3 aware of it unless the business alerted you 15:23:43

4 to it? 15:23:47

5 MR. KRAUSE: Objection. 15:23:47

6 A. So every bank's process is a 15:23:51

7 layered approach to determining suspicious 15:23:55

8 activity. The bank -- the bank has 15:23:59

9 monitoring systems, in this case the private 15:24:03

10 bank had monitoring systems, coupled with 15:24:06

11 negative media reviews, coupled with subpoena 15:24:08

12 searches. 15:24:12

13 So it's a layered approach to 15:24:12

14 determine whether or not a customer's 15:24:14

15 activity is what is normal and expected and 15:24:16

16 what we know, based on what we know about a 15:24:22

17 customer. 15:24:25

18 Q. So within that layered approach for 15:24:25

19 wire transactions within the private bank, 15:24:27

20 how would your team be made aware if there 15:24:32

21 was any suspicious activity in relation to a 15:24:36

22 wire transaction? 15:24:41

23 MR. KRAUSE: Objection. 15:24:43

24 A. So the surveillance of the private 15:24:44

25 bank evolved over the years that I was at the 15:24:53

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2 A. They spent, he didn't spend. 17:16:50

3 Q. Did you find it unusual that they 17:16:59

4 spent a good deal at spa establishments? 17:17:02

5 A. No. 17:17:08

6 Q. Looking at the beginning of find 17:17:25

7 No. 1, you say, the opening of DDA accounts 17:17:27

8 and a CC for two 18-year-olds turned 19 days 17:17:32

9 later, that appear to be part of his inner 17:17:39

10 entourage. One is mentioned in many of the 17:17:43

11 recaps of the escapades as a willing 17:17:45

12 participant and assistant when hosting 17:17:48

13 visitors. She has received about 450,000 17:17:50

14 since opening from Epstein. 17:17:53

15 Do you see that? 17:17:56

16 A. I do. 17:17:56

17 Q. Did you find it unusual that a man 17:17:57

18 over 50 years old was opening accounts for 17:18:02

19 18-year-old women who were not his relatives? 17:18:09

20 A. If they were significant other to 17:18:18

21 him, no, I would not have found that unusual. 17:18:21

22 Q. Did you find it unusual that a 17:18:25

23 willing participant of the escapades was paid 17:18:30

24 450,000 from Epstein? 17:18:37

25 A. I'm not sure which article this is 17:18:46

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2 referring to. The way -- the way I phrased 17:18:51  
3 it, if we are referring to that person 17:18:54  
4 earlier that I looked at, that was in another 17:18:57  
5 email, if -- I thought she was his 17:19:01  
6 significant other and she was routinely 17:19:09  
7 gifted money from Epstein and had her own 17:19:11  
8 account with her own credit card, which had 17:19:15  
9 no strings; meaning he didn't control it. 17:19:17  
10 She came and went with the banker however she 17:19:20  
11 would see fit, that did not appear that 17:19:22  
12 unusual to me. 17:19:26

13 Q. If you learned that she was not his 17:19:27  
14 significant other, would it have appeared 17:19:29  
15 unusual to you? 17:19:33

16 A. I would have found it very unusual 17:19:33  
17 that he would have sponsored somebody for the 17:19:36  
18 private bank to independently operate if -- 17:19:38  
19 that would not fit a fact pattern of somebody 17:19:46  
20 that was controlling somebody to me. 17:19:50

21 Q. Are you aware of anyone at the bank 17:19:52  
22 asking Jeffrey Epstein whether these women 17:19:56  
23 were his significant others? 17:20:00

24 A. I am not aware of what led to the 17:20:04  
25 opening of these accounts. 17:20:08