

EXHIBIT 36

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

Plaintiff,

Case No.

-against-
JPMORGAN Chase BANK NA,
Defendants.

1:22-cv-10019-JSR

- - - - -
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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1 M. Ryan - Confidential

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

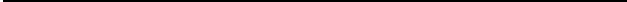
88 MR. KRAUSE: Objection. 09:53:54

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

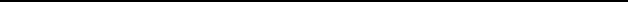
10 us, and I was fairly new at the bank so he 09:54:06

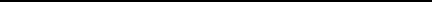
11 included myself and others that did things 09:54:13

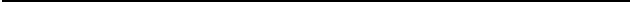
12 for the private bank in this email. 09:54:17

13  09 : 54 : 19

14 [REDACTED] 0.9 : 54 : 23

15  0.9 : 54 : 28

16  09:54:30

17  0.9 : 5.4 : 3.2

18 09:54:37

18 [REDACTED] 09:54:43

21 the_email where_it_says News / Sonar_Cash 09:54:46

22 Bpts 5 0.8 ± 54 ± 46

What is your understanding of the 0.8-1.5%?

24 meaning of that? 0.8 : 54 : 55

35 Sonar has an alerting engine that 0.8 ± 5.4 ± 5.7

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1	M. Ryan - Confidential	
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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1	M. Ryan - Confidential	
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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1	M. Ryan - Confidential	
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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1 M. Ryan - Confidential

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 █ 11:21:57

20 █ 11:22:07

21 █ 11:22:14

22 █ 11:22:19

23 █ 11:22:26

24 █ 11:22:30

25 █ 11:22:33

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1	M. Ryan - Confidential	
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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1	M. Ryan - Confidential	
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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1	M. Ryan - Confidential	
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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1 M. Ryan - Confidential

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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1	M. Ryan - Confidential	
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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1	M. Ryan - Confidential	
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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1 M. Ryan - Confidential

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

1 M. Ryan - Confidential

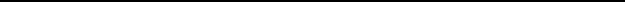
2 A. The television show by that name, 13:54:44
3 yes. 13:54:46

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

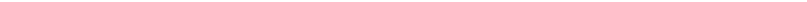
7 A. That entire series was based on 13:54:57
8 real life stories, and it's never difficult 13:55:03
9 to figure out, since I am a New Yorker, I 13:55:10
10 knew exactly what this particular episode was 13:55:14
11 on, and so I sent it to William so that he 13:55:16
12 could see. 13:55:20

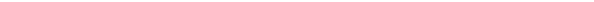
13 Q. In the episode do you recall them 13:55:20
14 ever mentioning Jeffrey Epstein or in any way 13:55:22
15 explicitly saying that the character 13:55:24
16 portrayed was referencing Jeffrey Epstein? 13:55:28

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

18   13 : 55 : 35

19 | 13 : 55 : 37

20  13:55:42

21  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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1 M. Ryan - Confidential

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 13:56:27

11 13:56:32

12 13 : 56 : 35

13 13:56:39

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

15 A. █ 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 commerates JE 13:57:23

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1 M. Ryan - Confidential

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

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

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

2 [REDACTED] 13:58:01

3 [REDACTED] 13:58:04

4 [REDACTED] 13:58:06

5 [REDACTED] 13:58:10

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

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

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

9 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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1 M. Ryan - Confidential

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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1 M. Ryan - Confidential

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

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

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

2 searches. 15:24:12

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

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

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

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

7 customer. 15:24:25

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

9 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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1	M. Ryan - Confidential	
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

1 M. Ryan - Confidential

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
0 She came and went with the banker however she 17:19:20
1 would see fit, that did not appear that 17:19:22
2 unusual to me. 17:19:26

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

6 A. I would have found it very unusual 17:19:33
7 that he would have sponsored somebody for the 17:19:36
8 private bank to independently operate if -- 17:19:38
9 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